

1. Introduction

The aim of this best practice is to contribute to the elimination and/or prevention of unsafe situations in the chemical chain by providing insight into the safe handling of drug precursors. In addition to their normal daily uses, some chemicals can also be abused by criminals to make drugs. Corporate vigilance plays an important role in detecting and disrupting preparations for such criminal activities. This best practice informs you how you can help prevent serious crimes.

This best practice recognizes the need for good cooperation between the parties involved in the chemical chain, including producers, transporters, warehouses, users, distributors.

2. Definitions

Drug precursor

Raw material to be used in the illicit manufacture of narcotic drugs and psychotropic substances. Drug precursors also have one or more legitimate scientific, industrial and/or pharmaceutical uses and may hence also be sold by chemical distributors.

User

Any natural or legal person who owns a registered substance and/or handles, chemically processes, incorporates and mixes with other substances, processes, consumes, stores and stores, transports registered substances.

3. Legal obligations

Many countries and regions have created lists of drug precursors. They typically classify the substances into categories based on their susceptibility to abuse. These categories sometimes differentiate between 'scheduled', 'listed', 'registered' and 'unregistered' substances, each with their own obligations.

ICTA has compiled a list of chemical substances that are subject to trade and voluntary controls, including drug precursors. It is titled 'Scheduled chemicals covered by trade and voluntary controls'. The list may offer a useful starting point for cross-reference for companies operating in countries without proper chemical security legislation. The list of chemical substances has been updated until 1 March 2021 and does not incorporate changes to the lists made after this date. See [here](#).

Legal obligations may include:

- Having a permit to distribute the substance;
- Obtaining an 'end use statement' from the buyer stating what he intends to do with the registered substances;
- Checking whether the buyer has a permit to work with the substance;
- Keeping records of all transactions;
- Registering users of the substance;
- Obtaining an export license for the export of the substances;
- Submitting an annual report to authorities stating the substance, the amount sold/used and the customers; and/or
- Reporting suspicious transactions, disappearances and theft to the authorities. It is strongly advised to also report suspicious transactions involving non-registered substances. Reports must be made before delivery.

Note that criminals sometimes apply minor alterations to the drug precursors to change the substance name and circumvent the rules. While such 'designer drug precursors' typically have no legal use (and are therefore not part of distributor's portfolios), it is important to be watchful for this trend.

4. Dealing with precursors

If you have the feeling that something is wrong with a customer or an order, use your common sense and contact the authorities, even if you are in doubt. To be able to assess whether a transaction is suspicious, some indications are provided below:

a. Is it a new customer?

- Does the customer fit the usual profile of your customers?
- Is the customer willing to provide further identification/information?
- Does the person show evasive behaviour?

b. Is the customer familiar with the product?

- Does the customer know the application and properties of the requested products?
- Are there (special) storage or handling requirements?
- Does the customer know these (special) requirements?

c. Does the customer request unusual quantities or concentrations of products?

- Both very small and very large quantities compared to normal orders
- Does the concentration of the product correspond to the declared use?
- Does the customer refuse alternative products or products with a lower concentration?
- Do they have a clear and legitimate use for the product?

d. Is it an unusual or strange combination of chemicals?

- Are there any chemicals that can be used to produce drugs or explosives?
- Are the chemicals listed on lists of banned or regulated chemicals (see list of precursors in the appendix)?

e. Does the customer want to pay in cash?

- Regardless of the value of the order
- Does the customer have a credit card?

f. Delivery

- Does the customer want to collect the goods himself?
- Does the customer have deviating/conspicuous requirements with regard to the packaging?
- Will the customer collect the goods in a passenger car?
- Is a delivery address known?
- Does the customer have strange, additional delivery requirements?

g. If you don't trust it:

- Consider asking the customer to confirm the order by email.
- Ask for identity papers (passport, driver's license, ADR certificate, Chamber of Commerce extract, etc.) and make copies of these.
- Can you slow down the process? Suggest calling the customer back after checking the stock, ask for credit card details etc.
- In the meantime, report the transaction as soon as possible to your authorities
- Write down as many details as possible, such as a description of the person's appearance, accent, behaviour, as well as vehicle details (color, model, license plate).
- Note the person's contact details: telephone number, e-mail address, postal and/or home address.
- Footage: Do you have security cameras? Save recordings!

5. Organisational

Aside from actions in case of a suspicious customer or transaction, chemical distributors should take organisational security measures to identify and address vulnerabilities, and to improve vigilance, prevent or mitigate incidents, enhance training and response capabilities, and to establish and maintain reporting relationships with key stakeholders.

ICTA has developed a voluntary, risk-based approach which provides a best practice procedural tool for companies when selling precursors or other substances that are subject to trade controls. It incorporates a know-your-customer concept and further guidance for reporting suspicious transactions. Adding to this, ICTA has developed a know-your-customer checklist which can be found in the ICTA best practice library, [here](#).

The document is titled 'Model agreement on voluntary measures on substances subject to trade controls to inform the company members of the national associations in membership of ICTA and help achieve continuous improvement in security performance'. See [here](#).

Disclaimer

This best practice has been developed by the Transport & Security Committee of ICTA. It is intended as a tool for chemical distributors to approach drug precursors in a structured way. It is not comprehensive and does not take into account any national or regional legal obligations to which you must adhere. For more information please contact the ICTA secretariat via www.icta-chem.org.