CODE OF PRACTICE FOR TRADE AND INDUSTRY

To Prevent Diversion of Chemicals for the Illicit Manufacture of Narcotic Drugs

CODE OF PRACTICE FOR TRADE AND INDUSTRY

TABLE OF CONTENT

PREFACE

This code in its original form was developed in 2005. This 2024 edition is revised to update relevant information on precursor control. The Code of Practice is voluntary, with the expectation of self-regulatory arrangements between the industry, law enforcement agencies and the community.

The United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, 1988 (1988 Convention) requires States Parties to take appropriate measures to prevent diversion of precursor chemicals and to cooperate with one another in this matter. Malaysia as a State Party is required to establish and maintain a system to monitor the international trade of substances in Table I and Table II of the 1988 Convention, in order to facilitate the identification of suspicious transactions. The International Narcotics Control Board (INCB), the Economic and Social Council (ECOSOC), and the Commission on Narcotic Drugs (CND) have consistently emphasized the need for and value of voluntary cooperation between governments and legitimate industries to supplement mandatory controls.

The ultimate objective of precursor control is to stop or significantly reduce the availability of precursors for illicit drug manufacture. The strategy to achieve precursor control needs to be comprehensive and would be incomplete without enlisting the support of the industry, since they represent the first line of defence and will be the first to identify any attempt at diversion of precursor chemicals manufactured by them. It is, therefore, necessary for the law enforcement agencies to seek the cooperation of the industry in preventing diversion of precursor chemicals. Diversion from licit trade is the most common source of precursors and other materials used for the manufacture of illicit drugs. As part of the process of cooperation, it is important to emphasize to the industry the need for self-regulation of their processes, particularly the manufacture, distribution, transportation, export, import, and use of precursors.

This can be achieved through a Code of Practice which the industry should adopt and follow to supplement the efforts of law enforcement, and to ensure that the legitimate trade of precursor chemicals is not hampered. The Code is used as a supplement to existing national legislation in line with the spirit of Article 12 of the 1988 Convention.

The Code is intended to help authorities to identify suspicious orders and ultimately, to track and apprehend traffickers involved in the diversion of precursors and the illicit manufacture of controlled drugs. Partnerships of this nature between Government authorities and the chemical industry will also enhance compliance with mandatory controls and help to establish a result-oriented approach to chemical control.

This Code of Practice does not exempt compliance with the requirements of other laws (acts and regulations) in force related to the handling of chemicals.

LIST OF ABBREVIATIONS

APAA	-	alpha-Phenyl-acetoacetamide
APAAN	-	alpha-Phenyl-acetoacetonitrile
ANPP	-	4-anilino-N-phenethylpiperidine
CND	-	Commission on Narcotic Drugs
ECOSOC	-	Economic and Social Council
EUD	-	End-User Declaration
INCB	-	International Narcotics Control Board
INN	-	International Nonproprietary Name
LSD	-	Lysergic acid diethylamide
MAPA	-	Methyl alpha-phenylacetoacetate
MDA	-	Tenamphetamine
MDE	-	N-ethyltenamphetamine
MDMA	-	3,4-methelenedioxymethamphetamine
N-OH MDA	-	N-hydroxytenamphetamine
NPP	-	N-Phenethyl-4-piperidone
PEPAP	-	1-(2-Phenethyl)-4-phenyl-4-acetoxypiperidine
PED	-	Pharmacy Enforcement Division

OBJECTIVES

The objective of this Code is to establish and promote a common system of practice for pharmaceutical and chemical industries in Malaysia, including manufacturers, importers, exporters, dealers, distributors and actual users (end-users) to:

i. Protect against the diversion of chemicals and equipment for illicit manufacture of narcotic drugs without hampering legitimate transactions;

ii. Cooperate with government and law enforcement agencies in the controlled delivery of chemicals destined for use in the illicit production of drugs, where this is expected to lead to the apprehension and conviction of criminals involved in such trade or production;

iii. Educate and train staff and, where practical, end users of the precursor drug chemicals as to the issues involved and the procedures to be adopted.

iv. To achieve these objectives, the code provides guidance and information on a range of practical control measures that industry and individuals can take.

SCOPE

This Code shall apply to the following categories of industry and trade which deal with chemicals and equipment that can be used in the manufacture/production of narcotic drugs;

- Manufacturers
- Agents, distributors and dealers/brokers
- Consumers/actual users/end-users
- Exporters
- Importers

INTRODUCTION

Precursor Chemicals

The term “precursor” is used to indicate any substance listed in Table I or II of the United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances 1988 (1988 Convention). Such substances are often described as precursors or essential chemicals, depending on their principal chemical properties. Instead, the expression “substances frequently used in the illicit manufacture of narcotic drugs and psychotropic substances” was introduced in the Convention. It has become common practice, however, to refer to all such substances simply as “precursors”. The terms “precursor” and “chemical” can be specified as follows:

Precursor - Any chemical substance that may be used in the production, manufacture and/or preparation of narcotic drugs and psychotropic substances with the particularity that incorporate its molecular structure to the final product.

Chemical - Any essential substance that may be used in the production, manufacture, extraction and/or preparation of narcotic drugs and psychotropic substances, as a solvent or reagent.

Currently, there are 51 scheduled substances listed in the Table I and II of the 1988 Convention, as shown in **Annex VIII**;

THE LICIT AND ILLICIT USES OF THE PRECURSOR CHEMICALS.

Precursor chemicals that are used illegally to manufacture illicit drugs are also used for legitimate purposes. The licit and illicit uses of the precursor chemicals are shown as follows:

SUBSTANCES	LICIT USE	ILLICIT USE	TABLE
Acetic anhydride	Acetylating agent in chemical and pharmaceutical industry, for manufacture of cellulose acetate, for textile sizing agents and cold bleaching activators, for polishing metals and production of acetylated plastic auxiliaries and certain type of brake fluids, dyes, explosive.	Reactant used in manufacture of heroin; for synthesis of N-acetyl-anthranilic acid, methaqualone and 1-phenyl-2- propanone.	I
N-acetylanthranilic acid	Manufacture of pharmaceuticals, plastics and chemicals.	Synthesis of methaqualone and mecloqualone.	I
4-Anilino-N-phenethylpiperidine (ANPP)	Used in the pharmaceutical industry for the manufacture of fentanyl and its analogue. Also used as reference standard in research and forensics.	Synthesis of Fentanyl.	I
Ephedrine	Manufacture of Bronchodilators (cough Medicines).	Synthesis of Methamphetamine.	I
Ergometrine	Treatment of migraine, and as an oxytocic in obstetrics.	Synthesis of LSD and Lysergic acid.	I

Ergotamine	Manufacture of pharmaceuticals; treatment of migraine and cluster headaches; used as an oxytocic in veterinary medicine	Synthesis of LSD	I
Isosafrole	Manufacture of piperonal; to modify oriental perfumes; to strengthen soap perfumes; in small quantities together with methyl salicylate in root beer and sarsaparilla flavours: also used as pesticide.	Synthesis of MDA, MDE, MDMA and N-hydroxy-MDA.	I
Lysergic acid	In organic synthesis.	Synthesis of LSD.	I
Methyl alpha-phenylacetoacetate (MAPA)	For research, development and laboratory analytical purposes.	Manufacture of substance 3,4-methylenedioxymethamphetamine (MDMA) and other "ecstasy"-type.	I
3, 4-methylenedioxyphenyl-2-propanone (3,4-MDP-2-P)	Manufacture of piperonal and other perfume component.	Synthesis of MDA, MDE, MDMA and N-hydroxy-MDA.	I
3,4-MDP-2-P methyl glycidate (PMK glycidate)	For research, development and laboratory analytical purposes.	Manufacture of 3,4-methylenedioxymethamphetamine (MDMA) and other "ecstasy"-type substances.	I
3,4-MDP-2-P methyl glycidic acid (PMK glycidic acid)	For research, development and laboratory analytical purposes.	Manufacture of substance 3,4-methylenedioxymethamphetamine (MDMA) and other "ecstasy"-type substances.	I
Norephedrine	Manufacture of nasal decongestants and appetite suppressants.	Synthesis of Methamphetamine.	I

N-Phenethyl-4-piperidone (NPP)	Used in the pharmaceutical industry, mainly for the manufacture of fentanyl and its analogue.	Synthesis of Fentanyl.	I
Phenylacetic acid	Used in the chemical and pharmaceutical industry for the manufacture of phenylacetate esters, amphetamine and its derivatives; also used for the synthesis of penicillin and in fragrance applications and cleaning solutions.	Synthesis of amphetamine, methamphetamine and 1-phenyl-2-propane.	I
alpha-Phenyl-acetoacetamide (APAA)	For research, development and laboratory analytical purposes.	Synthesis of amphetamine, methamphetamine and 1-phenyl-2-propane.	I
alpha-Phenyl-acetoacetonitrile (APAAN)	For research, development and laboratory analytical purposes.	Synthesis of methamphetamine, amphetamine and P2P.	I
1-Phenyl-2-propanone (P-2-P)	In chemical and pharmaceutical industries to manufacture, amphetamine, methamphetamine and some derivatives; for synthesis of propylhexedrine; cleaning solution additive.	Synthesis of amphetamine and methamphetamine.	I
Piperonal	In perfumery; in cherry and vanilla flavours; in organic synthesis and as component for mosquito repellent.	Synthesis of MDA, MDE, MDMA and N-hydroxy-MDA.	I

Potassium permanganate	Important reagent in analytical and synthetic organic chemistry. Bleaching applications, disinfectants, antibacterial and antifungal agents	Key chemical in the conversion of coca paste to cocaine base.	I
Pseudoephedrine	Manufacture of bronchodilators and nasal decongestants.	Synthesis of methamphetamine.	I
Safrole	In perfumery, e.g. in manufacture of piperonal, denaturing fats in soap manufacture.	Synthesis of MDA, MDE, MDMA and N-hydroxy-MDA.	I
Acetone	Common solvent used in the chemical and pharmaceutical industry; used in production of lubricating oils; as an intermediate in the manufacture of chloroform and in the manufacture of plastics, paints, lubricants, varnishes and cosmetics.	As solvent in processing opium and coca leaves, leading to manufacture of heroin and cocaine. Also used as solvent in synthesis of amphetamines and LSD.	II
Anthranilic acid	Chemical intermediate used in the manufacture of dyes, pharmaceuticals and perfumes; also used in the preparation of bird and insect repellents.	Synthesis of methaqualone and mecloqualone.	II
Ethyl ether	As solvent in chemical laboratories and in the chemical and pharmaceutical industry; mainly used as an extractant for fats, oils, waxes and resins; also used for the manufacture of munitions, plastics and perfumes and, in medicine, as a general anaesthetic.	As solvent in processing opium and coca leaves, leading to manufacture of heroin and cocaine.	II

Hydrochloric acid	Production of chlorides and hydrochlorides, for the neutralization of base systems; as a catalyst and solvent in organic synthesis.	Manufacture/ synthesis of heroin hydrochloride and other controlled substances, such as amphetamine, cocaine, diethyltryptamine, fentanyl and its analogue, LSD, mescaline, methaqualone, PEPAP, phencyclidine and psilocin.	II
Methyl ethyl ketone	Manufacture of coatings, solvents, degreasing agents, lacquers, resins and smokeless powders.	As solvent, used in converting cocaine base to cocaine hydrochloride.	II
Piperidine	Solvent and reagent in chemical laboratories and in the chemical and pharmaceutical industry; also used in the manufacture of rubber products and plastics.	Synthesis of phencyclidine and tenocyclidine.	II
Sulphuric acid	Used in the production of sulphates; as an acidic oxidizer; as a dehydrating and purifying agent; for the neutralization of alkaline solutions; as a catalyst in organic synthesis; in the manufacture of fertilizers, explosives, dyestuffs and paper; and as a component of drain and metal cleaners, anti-rust compounds and automobile battery fluid.	Extraction of cocaine from coca leaves, conversion of coca pastes to cocaine-base, production of sulphate salts of amphetamine, mescaline and morphine.	II
Toluene	Industrial solvent; used in the manufacture of explosives, dyes, coatings and other organic substances and as gasoline additive.	Solvent in synthesis of: e.g. amphetamine, cocaine, fentanyl, mecloqualone, methadone, methaqualone, phencyclidine and its analogue, and psilocine.	II

ADDITIONAL CONTROL ON PRECURSORS AND NON-PRECURSORS

Ephedrine and Pseudoephedrine Preparations

In its resolution 49/3 (2006), the Commission on Narcotic Drugs (CND) requested Member States to provide to INCB annual estimates of their legitimate requirements for 3,4-methylenedioxyphenyl-2-propanone (3,4-MDP-2-P), pseudoephedrine, ephedrine and 1-phenyl-2-propanone (P-2-P) (precursor chemicals frequently used in the illicit manufacture of amphetamine-type stimulants) and, to the extent possible, estimated requirements for imports of preparations containing those substances that could be easily used or recovered by readily applicable means.

INCB has reported the recovery of large amounts of preparations containing ephedrine and pseudoephedrine from illicit amphetamine and methamphetamine manufacturing sites. Pseudoephedrine and ephedrine can be easily used or recovered by readily applicable means from preparations containing them, thus making them attractive to traffickers and to manufacturers of illicit methamphetamine and amphetamine. INCB's Member States are recommended to apply similar control measures for pharmaceutical preparations containing ephedrine and pseudoephedrine as those for bulk (raw) precursor chemicals.

Therefore, effective from 1 January 2011, PSD has imposed the same control measures on pharmaceutical preparations containing ephedrine and pseudoephedrine as those imposed on bulk (raw) ephedrine and pseudoephedrine, by listing them under the Customs (Prohibition of Import) Order and Customs (Prohibition of Export) Order. Thus, a permit is required for the import and export of said preparations. In addition to that, pharmaceutical manufacturers/importers are required to apply for annual estimates of their legitimate requirements of these substances, including imported preparations, from the Pharmacy Enforcement Division (PED) prior to applying for an import permit.

Non-Scheduled Substances

There are other chemicals not listed in the Table I and II of the 1988 Convention which are also identified to be used in the illicit manufacture of narcotic drugs and psychotropic substances, as shown in Annex I.

Efforts to reduce the illicit supply of narcotic drugs and psychotropic substances and thus maintain effective control of scheduled substances are being undermined by drug traffickers, who are increasingly using non-scheduled substances as substitutes for scheduled substances in the illicit manufacture of narcotic drugs and psychotropic substances.

It is important to note that the prevention of diversion of non-scheduled substances is a key element in reducing the illicit manufacture and supply of narcotic drugs and psychotropic substances. However, it is also pertinent to be aware of the legitimate need of industry to have access to non-scheduled substances and the important role that industry plays in preventing the diversion of those substances from the licit trade.

Keeping in mind their potential for misuse in the manufacture of narcotic drugs and psychotropic substances, the industry can also recommend inclusion of other substances to the suspect list of chemicals, thereby maintaining a ‘watch list’.

Phosphorous, Hypophosphoric acid and Hypophosphorous acid.

The Royal Malaysia Police (RMP) has identified these chemicals being used in the illicit production of methamphetamine. Salts of hypophosporous acid are known as hypophosphite salts. Examples of these salts are: ammonium hypophosphite, calcium hypophosphite, iron hypophosphite, potassium hypophosphite, manganese hypophosphite, magnesium hypophosphite and sodium. Sodium hypophosphite is the most commercially available salt and is distributed in a white crystalline form.
Thus, in an effort to curb the misuse of these chemicals, Phosphorous (2804.7000), Hypophosphoric acid (2809.20.3100/ 2809.20.9100) and Hypophosphorous acid (2809.20110) have been gazetted into Custom (Prohibition of Import) Order 2016 and came into effect on 1st June 2016. Importation of these chemicals should be

accompanied by a Poisons Licence issued under the Poisons Act 1952, and an Import Permit issued under the Custom (Prohibition of Import) Order which is processed by the PED.

Phosphorous, Hypophosphoric acid and Hypophosphorous acid are also listed under the list of items which require an import/export ePermit issued by the PED which can be found on, https://pharmacy.moh.gov.my/ms/dokumen/panduan-umum-permohonan-epermit-import-eksport-dikeluarkan-bpf-kkm.html.

Medicine Making Machines

Article 13 of the 1988 Convention emphasizes the control over the equipment used in the production of illegal drugs, among which is the medicine making machine. Medicine making machines have been regulated under the Customs (Prohibition of Import) Order where an import permit is required for each importation. This permit is issued by PED and imported machines cannot be transferred to other parties without approval from PED.

LEGISLATION GOVERNING PRECURSOR CHEMICALS

National Legislations

Domestically, precursor chemicals are regulated under the following acts and regulations:

- Poisons Act 1952 and its regulations
- Sale of Drugs Act 1952 and its regulations
- Customs (Prohibition of Import) Order
- Customs (Prohibition of Export) Order

Summary of the control on scheduled precursors are as in **Annex IX.**

International Controls

Obligations under the 1988 Convention and citation of important matters specified in Article 12 of the 1988 Convention;

- Parties to take appropriate measure to prevent the diversion of Table I and Table II substances.
- Control all persons and enterprises engaged in the manufacture and distribution of such substances.
- Control under licence the establishment and premises in which such manufacture or distribution may take place.
- Require that licensees obtain a permit for conducting the aforesaid operations.
- Prevent the accumulation of such substances in the possession of manufacturers and distributors, in excess of the quantities required for the normal conduct of business and the prevailing market conditions.
- To monitor international trade in Table I and II substances in order to facilitate the identification of suspicious transactions.
- Provide for the seizure of any substance in Table I or Table II.
- Notify the competent authorities if there is reason to believe that the import, export or transit of Table I or II substances is destined for the illicit manufacture of narcotic drugs or psychotropic substances.
- Require that imports and exports be properly labelled and documented - invoices, cargo manifests, customs, transport and other shipping documents shall include the chemical's name, quantity, the name and address of the exporter, the importer and, when available, the consignee.
- Ensure that documents are maintained for a period of not less than two years and may be made available for inspection by the competent authorities.
- Parties are obliged to provide advance notice of the export to any parties who ask to receive such advance notice.

PROCEDURES

Implementing laws and regulations alone is not sufficient to curb the diversion of precursor chemicals from the licit market to illicit drug manufacture. Since the industry manufactures, trades and uses precursor chemicals legally, they are potentially the target of criminals or traffickers involved in illicit drug manufacturing. They become the first point of contact for criminals and thus, are in a good position to detect orders of precursor chemicals intended for illicit use.

In this Code, there are several basic procedures which can be adopted by the industry in order to detect suspicious orders and prevent diversion.

Record keeping

Companies dealing with precursor chemicals are required to maintain statutory records as prescribed under national legislation (the Poisons Act 1952 and its regulations) and prepare and maintain a standard operating procedure (SOP) that follows the minimum procedures recommended below:

- Production
- Storage and handling
- Delivery and transportation
- Sale and marketing
- Disposal of precursors
- Notification of suspicious orders or enquiries
- Education and training
- Liaison officers

The records so maintained are required to be preserved for a minimum period of 2 years.

According to Section 15(3) Poisons Act 1952, the sale of any poison by wholesale must be recorded in the Poisons Wholesale Sales Book as prescribed under the Act. The following information relating to each transaction involving scheduled chemicals (including non-poisons) such as the following shall be maintained for a period of not less than two years and shall be made available to the appropriate government authorities upon request;

- Name and address of purchaser
- Date of the sale/supply
- Name and quantity of chemical sold
- Purpose for which the chemical is stated to be required by the purchaser

The purchaser is required to affix his signature to the entry in the Poisons Wholesale Sales Book or alternatively, forward a written order with respect to the sale, signed by the purchaser and containing the particulars required to be entered in the book under this Act. Every such written order shall be retained by the seller and a reference to the file in which such order is retained shall be entered in the book in place of the purchaser's signature.

Production

The production department should maintain and keep a daily record, for each precursor manufactured or used, which must include the following information:

- Opening stock
- Amounts produced/manufactured
- Amounts sold/delivered
- Amounts imported
- Amounts exported
- Amounts lost, destroyed or reduced by effects such as shrinkage and other causes such as accidents, pilferage, manufacturing losses, etc.
- Amounts consumed internally
- Closing stock

The quantity of the chemical must be recorded in prescribed weights and measures such as kilograms, litres etc. The record must be duly authenticated on a daily basis by the Head/licence holder/ authorized officer of the company.

The company must declare the raw materials used, process flow chart and the input/output ratio relating to the manufacture of the precursor chemical, or other chemicals produced using precursor chemicals. Similar declaration must be made by the end users in relation to the precursor chemicals used by them. This may be done once in a year at the beginning of the fiscal year.

Storage and Handling

The precursor chemicals are required to be stored in secured containers/tanks in such a manner that physical checks and verification of the stock can be undertaken easily. Daily stock levels must be monitored internally by the licence holder/ authorized officer of the company and must be tallied with the statutory records maintained for the same.

The handling of the precursor chemicals must be restricted to specific persons deployed for the purpose to ensure that there is no pilferage. Records must be maintained relating to storage, issue, receipt and such records are required to be audited internally at regular intervals. Any loss of the substance in handling or due to environmental conditions such as temperature variations etc. must be recorded and reported to statutory authorities within the specified time frame.

The employer has a responsibility to ensure that the chemicals to be stored, supplied or purchased are labelled and that labels are not removed, defaced, modified or altered. Labelling should be in accordance with the Occupational Safety and Health (Classification, Labelling and Safety Data Sheet of Hazardous Chemicals) Regulations 2013. The purpose of labelling is to ensure that the contents of a container can be readily identified by product name.

Sales and Marketing

Each company shall closely monitor all sales of scheduled chemicals and comply with the existing laws and regulations, including requirements under this Code. To determine the authenticity of a potential client, the company must verify certain information regarding the client. This information is to establish the identity of the individual or business entity, and also to determine the end use of the chemical being purchased.

As a means of gathering this information, an end-user declaration form was developed to collect detailed information on the identity of the person or company requesting to purchase the substance or equipment, the financial details of the transaction, the intended use of the material and specific details describing the product or product purchased.

A complete End User Declaration (EUD) shall be accompanied with a written order for all Table I and Table II substances except for pharmaceutical preparations containing ephedrine or pseudoephedrine. If the customer is reluctant to give an EUD, the seller should explain that the precursor chemicals possibly can be misused for manufacturing illicit drugs and therefore customers should declare that the precursor chemicals ordered are not for illegal purpose.

The template of EUD as per **Annex II to V.**

Delivery and Transportation

Supply and delivery of precursor must be made only upon written purchase order and receipt of authorized delivery advice or delivery order duly signed by the designated/authorized officer of purchasing/marketing/logistic.

The delivery must be made only at the address of the consignee or their assigned place of delivery mentioned in the delivery documents and not to any other place. Any loss of

the substance during transportation such as leakage, accidents, etc., must be reported to the relevant Authority immediately.

Disposal of Precursors

Pharmaceutical companies that wish to destroy or dispose of pseudoephedrine, ephedrine or preparations containing ephedrine and pseudoephedrine must do so under the supervision of the license holder/liaison officer, with prior approval and under the supervision of a Pharmacy Enforcement Officer. The template of report form "***BORANG LAPORAN KEHILANGAN DAN PELUPUSAN BAHAN TERKAWAL***" is as **per Annex VI**.

The companies shall adopt the necessary measures to ensure that the disposal of other precursor chemicals is in accordance with relevant requirements or legislation available.

Notification of Suspicious Orders or Enquiries

When a written order for scheduled substances is received, the industry must use discretion and draw upon experience to ascertain whether the order or enquiry is "routine" or "suspicious. The following list has been compiled and can be used as a guide in order to identify suspicious orders or enquiries.

Possible indicators of suspicious orders or enquiries which can be used by the industry to identify suspect customers or chemical shipments;

- A new customer
- A 'walk-in" customer (personal appearance)
- An offer to pay an excessive price for certain chemicals or for rapid delivery
- Cash payments, even for large purchases
- Requests to have the merchandise delivered in non-commercial or unmarked packing
- Purchases in small containers even when industrial use is claimed

- Irregular ordering patterns
- Orders or purchases by persons or companies with no obvious need for these chemicals
- Indications of intended use that is inconsistent with the chemical ordered
- Merchandise that is collected with the purchaser's own vehicle
- Request for delivery by air freight
- Delivery to a post office box or other incomplete address
- Failure or unwillingness to supply a telephone number or an address
- Lack of business acumen
- Absence of standard business stationery
- Reluctance to supply a written order
- Orders for more than one precursor chemical
- Orders to universities or well–known companies where the normal arrangements for ordering are used but delivery is requested to a specific individual
- Orders to companies which are not known and cannot readily be traced in trade directories
- Orders for chemicals with delivery instructions where the cost of delivery or routing exceeds the cost of the merchandise.
- Delivery to a place other than address mentioned in delivery documents
- Unusual quantities ordered or order for abnormal quantities received from existing customers

At international trade level, there are some additional indicators that need to be taken into consideration in order to identify suspicious transactions. Reasonable grounds of suspicion are as follows:

- Destination of the goods - Consignments destined to drug-producing region or a country known for illicit manufacture of drugs. The consignees in the border areas may be fictitious.
- Beware of orders received through the internet
- Orders received from importer based in a country with request to ship the consignment to a different country (transit)
- Prefer to pay full amount prior to export of the consignment

- Request to ship the consignment through a specific carrier or to follow a specific route, which may not be the normal route
- Documents such as import permits produced appear to be forged
- Payments received from a country different from the destination of the goods
- Customers not willing to enter into regular correspondence or continue to maintain contact
- Conduct which is normally against good business practice

Should the industry and trade come across a situation which appears to be suspicious and involves one or more of the circumstances referred to above, they must notify the Pharmacy Enforcement Division of the suspicious enquiry or order for chemicals in Table I and II via the contact below:

Pharmacy Enforcement Division,
Ministry of Health, Malaysia
Lot 36, Jalan Profesor Diraja Ungku Aziz,
46200 Petaling Jaya, Selangor
Tel: 03-7841 3200

The suspicious enquiry or order that needs to be reported is not limited to those pertaining to Table I and II precursor chemicals but also includes mixtures and compounds which contain substances that can be extracted for the illicit manufacture of drugs.

The cooperation of the industry in reporting suspicious transactions will not only facilitate the Authorities in preventing the diversion of the substances from licit trade and in identifying the persons involved, but will also protect the industry and trade in the event of backtrack investigation by the Authorities.

Standard Operating Procedure (SOP) of Handling of Controlled Substances

Handling of controlled substances specifically narcotics, psychotropics, ephedrine and pseudoephedrine (including pharmaceutical preparations) has been strengthened through the requirement to establish a SOP started since April 2016. The SOP should cover all levels of operations, beginning at the point of purchasing until delivery and disposal. In addition to that, a new requirement was introduced whereby the company's licensed pharmacist is obliged to report to the Pharmacy Enforcement Division of any incident of theft, loss and disposal by using the form "*Borang Laporan Kehilangan dan Pelupusan Bahan Terkawal*" as per **Annex VI**.

Education and Training

Companies shall adopt this Code of Practice as part of their training programme and incorporate it in the company standard operating procedure (SOP). Companies are required to educate and train their staff who are involved in the storage, handling, sale, and use of chemicals listed in Table I and II to take appropriate precautions and to follow procedures that will enable them to cooperate with the Government and Law Enforcement Agencies. Companies are required to maintain training records for any training conducted

Special attention, awareness and training should be given to all staff involved in the sale and handling of precursor chemicals/preparations.

The industry must ensure that purchasers or users of precursor chemicals listed in Table I and II understand and are aware of the potential misuse of these chemicals and the procedures that should be taken to minimize their diversion into the illicit manufacture of drugs.

Annex VII provides a working example of an Internal Compliance Checklist.

Liaison Officers

Companies shall nominate, in each premises, one or more liaison officer whose specific responsibility shall be to:

- Ensure that appropriate systems and procedures are introduced and maintained, and that staff members are regularly and effectively trained to facilitate adequate sales monitoring and record keeping.
- Ensure that “suspicious orders and enquiries” are reported to the Pharmacy Enforcement Division by fax or email, together with the EUD and purchase order/invoice.
- The liaison officers should be the Poison Licence holder, or management level officers for non-poison chemicals.

PENALTIES

Poisons Act 1952

Record keeping	Any person who wilfully fails to keep any register required to be kept under this Act or under any regulation made thereunder or who wilfully fails to make in such register any entry required to be made by any of this Act or of any regulation made thereunder or who knowingly or recklessly makes any false entry in such register which he knew to be false or which he did not believe to be true shall be guilty of an offence and punishable by a fine not exceeding five thousand ringgit (RM5000) or by imprisonment for a term not exceeding two (2) years or both
Other offences	Any person guilty of an offence against this Act, for which no other penalty is specifically provided by this Act or by any regulations made thereunder, shall be punishable by a fine not exceeding fifty thousand ringgit (RM50,000) or by imprisonment for a term not exceeding five (5) years or both: Provided that if the act or omission with which such person is charged is in the opinion of the court of such a nature as to amount to wilful default or culpable negligence, which endangered or was likely to endanger human life, such person shall be liable, on conviction, to a fine not exceeding two hundred thousand ringgit (RM200,000) or to imprisonment for a term not exceeding ten (10) years or both.

Customs Act 1967

Whoever is concerned in importing or exporting any prohibited goods contrary to such prohibitions whether such prohibited goods be shipped, unshipped, delivered or not; shall be guilty of an offence and shall, on conviction;

First offence	A fine of not less than ten (10) times the value of the goods or fifty thousand ringgit (RM50,000), whichever is the greater amount, and of not more than twenty (20) times the amount of the customs duty or five hundred thousand ringgit (RM500,000), whichever is the greater amount, or to imprisonment for a term not exceeding five (5) years or to both.
Second or subsequent offence	A fine of not less than twenty (20) times the amount of the customs duty or one hundred thousand ringgit (RM100,000), whichever is the greater amount, and of not more than forty (40) times the amount of the customs duty or one million ringgit (RM1,000,000), whichever is the greater amount, or to imprisonment for a term not exceeding seven (7) years or to both.

Provided that where the value cannot be ascertained the penalty may amount to a fine not exceeding ten thousand ringgit in the case of prohibited goods other than cigarettes containing tobacco and intoxicating liquor—

First offence	A fine of not less than ten (10) times the value of the goods or fifty thousand ringgit (RM50,000), whichever is the greater amount, and of not more than twenty (20) times the value of the goods or five hundred thousand ringgit (RM500,000), whichever is the greater amount, or to imprisonment for a term not exceeding five (5) years or to both;
Second offence	A fine of not less than twenty (20) times the value of the goods or one hundred thousand ringgit (RM100,000), whichever is the greater amount, and of not more than forty (40) times the value of the goods or one million ringgit, whichever is the greater amount, or to imprisonment for a term not exceeding seven years or to both.

ANNEXES

ANNEX I

NON-SCHEDULED CHEMICALS THAT CAN BE USED IN ILLICIT MANUFACTURE OF NARCOTIC DRUGS

1. Precursors, reagents and other chemicals used in the illicit manufacture of amphetamine-type stimulants and other psychotropic substances

Substance [1]	**CAS Registry Number** [2]
Acetonitrile	[75-05-8]
Ammonia (including aqueous solutions)	[7664-41-7]
Ammonium formate	[540-69-2]
Benzaldehyde	[100-52-7]
Benzyl chloride	[100-44-7]
Benzyl cyanide	[140-29-4]
1,4-Butanediol	[110-63-4]
γ-Butyrolactone	[96-48-0]
Chloroephedrine [1,3]	[110925-64-9, 1384199-95-4]
Chloropseudoephedrine [1,3]	[73393-61-0, 771434-80-1]
Ethyl phenylacetate	[101-97-3]
Formamide	[75-12-7]
Formic acid	[64-18-6]
Hydriodic acid	[10034-85-2]
Hydrobromic acid	[10035-10-6]
Hypophosphorous acid	[6303-21-5]
Iodine	[7553-56-2]
Lithium aluminium hydride	[16853-85-3]
Methylamine (monomethylamine)	[74-89-5]
3,4-Methylenedioxyphenyl-2-nitropropene (3,4-MDP2NP, 3,4-MDP-2-P nitropropene) [1]	[5438-41-5]
N-Methylformamide	[123-39-7]
Methyl phenylacetate	[101-41-7]
Nitroethane	[79-24-3]
l-Phenylacetylcarbinol[1]	[90-63-1]
1-Phenyl-2-nitropropene (P2NP, P-2-P nitropropene) [1]	[705-60-2]
Phosphorous (Red)	[7723-14-0]
Propiophenone (1-phenyl-1-propanone)	[93-55-0]
Tartaric acid	[87-69-4,526-83-0]
Thionyl chloride [4]	[7719-09-7]
o-Toluidine	[95-53-4]

Note:

1 Substances with no known legitimate uses are highlighted in bold italics.

2 Where substances exist as different optical isomers, the CAS registry numbers included in this list refer to the specific optical isomer that has typically been encountered in illicit manufacturing contexts. Other optical isomers might also be encountered but might result in less potent forms of final drug and/or lower yields.

3 Chloroephedrine and chloropseudoephedrine are intermediary products in the synthesis of methamphetamine from ephedrine and pseudoephedrine. However, the stereochemical relation of the intermediary products to their initial precursor (ephedrine or pseudoephedrine) is complex, involving both inversion and retention of configuration.

4 Also included in Schedule 3 B of the Chemical Weapons Convention

2. Catalysts

Substance	**CAS Registry Number**
Mercuric chloride	[7487-94-7]
Palladium (in all forms) and Palladium chloride	[7440-05-3] / [7647-10-1]
Platinum oxide	[1314-15-4]
Raney nickel	[7440-02-0]

3. Substances used in the illicit manufacture of synthetic narcotic drugs

Substance	**CAS Registry Number**
Aniline	[62-53-3]
4-Piperidone and 4-Piperidone monohydrate hydrochloride	[41661-47-6]/ [40064-34-4]
Propionic anhydride	[123-62-6]
Propionyl chloride	[79-03-8]
Sodium borohydride	[16940-66-2]

ANNEX I

4. Chemicals used for the illicit processing of cocaine and heroin

Substance	CAS Registry Number
Acetic acid (glacial)	[64-19-7]
Acetyl chloride	[75-36-5]
Ammonium chloride	[12125-02-9]
Calcium carbonate	[471-34-1]
Calcium chloride	[10043-52-4]
Calcium hydroxide	[1305-62-0]
Calcium oxide	[1305-78-8]
Manganese dioxide	[1313-13-9]
Sodium carbonate	[497-19-8]
Sodium hydroxide	[1310-73-2]
Sodium hypochlorite	[7681-52-9, 10022-70-5]
Sodium metabisulfite	[7681-57-4]

5. Solvents used for the illicit processing of cocaine and heroin

Substance	CAS Registry Number
Benzene	[71-43-2]
Ethyl acetate	[141-78-6]
Methyl isobutyl ketone	[108-10-1]
n-Propylacetate	[109-60-4]

ANNEX II

K-FR-31

COMPANY'S/AGENCY'S LETTERHEAD &
FULL REGISTERED ADDRESS & BUSINESS REGISTRATION NO

END – USER DECLARATION (EUD)

The Chemical product(s) I wish to purchase is classified as a possible illicit drug precursor or auxiliary reagent. I understand that to be supplied this product a signed end-user declaration must be provided together with an order, on identifiable company stationery.

Company's nature of business: …..……

Name of chemical	Quantity	Pack Size	Order No.
……	……	……	……

The substance will be solely for ; [Please tick (√) where applicable]

	Analytical	***MANDATORY : Please specify full details of assay, project, product, customer(s), etc:*** …… …… …… …… ……
	R & D	
	Manufacturing	
	Resale	
	Others	

The substance will represent a supply which is estimated to be sufficient for……..…….months. (maximum 12 months).

Purchaser Details and Declaration

I, ……..……(Full Name) IC No……

being……..…..……(Position)

on behalf of …….. (Company or Institution)

Address……

……..

No Tel:…… No. fax:……Email :……..

hereby declare that the above chemical product(s) will not be used for the manufacture of illicit drugs.

Signature: ……Company stamp:
Date: ……..

Details of purchaser or collecting person's identification;

☐ Valid photographed identification card/passport
☐ For export must provide with a valid export license from the approved authority

***Note: To be prepared on the company's letterhead**

ANNEX III

K-FR-32

KEPALA SURAT SYARIKAT
MAKLUMAT TUJUAN PENGGUNAAN OLEH PENGGUNA AKHIR

Bahan kimia/ Produk yang ingin dibeli dikategorikan sebagai bahan kimia terkawal. Sehubungan itu, maklumat kegunaan akhir bahan kimia/ produk hendaklah disertakan sebagai dokumen sokongan untuk kelulusan permit import/ eksport

Syarikat menjalankan perniagaan :……

Nama Bahan Kimia/ Produk	**Kuantiti**	**Unit**	**No. *Written Order***
……..	……	……..	……

Maklumat penggunaan Bahan Kimia/ Produk ; [Tandakan (√) yang berkenaan]

	Analisis	***Sila nyatakan kegunaan dengan jelas:***
	Penyelidikan	……
	Pengilangan	……
	Jual semula	……
	Lain-lain	……
		……

Bahan/ Produk ini dianggarkan untuk kegunaan ……..……bulan.

Maklumat Pengguna Akhir & Deklarasi

Saya,……...(Nama Penuh) No. K/P……
sebagai……(Jawatan)
wakil dari …… (Syarikat) ……..……yang beralamat di……
……..
No.Tel:……..……. No.faks:……..……Email :……
mengesahkan bahan kimia/ produk ini akan digunakan untuk tujuan yang dinyatakan di atas sahaja.

Tandatangan: ……Cap syarikat :

Tarikh: …….

***Nota: Disediakan menggunakan kepala surat syarikat**

ANNEX IV

K-FR-29

***LETTER HEAD* SYARIKAT**
ALAMAT PENUH SYARIKAT & NO PENDAFTARAN SYARIKAT

DEKLARASI PEMBEKALAN / PEMBELIAN MESIN PEMBUAT UBAT

(bagi memenuhi keperluan di bawah *Article 13, United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, 1988*)

Saya memahami bahawa deklarasi ini perlu dikemukakan kepada Bahagian Penguatkuasaan Farmasi sebelum pembekalan mesin pembuat ubat dibuat kepada pembeli.

Maklumat Pembekal

Nama Pembekal dan Alamat	
Jenis Perniagaan Syarikat	
Jenis Mesin, Model & No. Siri	
Kuantiti	
Tarikh Pengimportan dan Nombor Permit Import (jika ada)	

Maklumat & Deklarasi Pembeli

Nama Penuh	
No. Kad Pengenalan	
Jawatan	
Nama dan Alamat Syarikat/ Institusi	
No. Telefon & E-mel	

Saya dengan ini akan mematuhi syarat-syarat berikut;

1(i). Mesin ini ditempatkan dan digunakan bagi tujuan berikut: (sila tandakan ☑ dan rujuk nota* di m/s 2)

- ☐ Mengilang keluaran yang berdaftar dengan PBKD[a]
- ☐ Mengilang keluaran **selain** keluaran yang berdaftar dengan PBKD[b]
- ☐ Lain-lain; Nyatakan: ……..……

1(ii). Di **alamat premis** seperti berikut; (jika berlainan daripada alamat di atas)

……..……
……..……

2. Mesin ini **tidak boleh dipindah milik kepada pihak lain** tanpa kebenaran daripada Bahagian Penguatkuasaan Farmasi, Kementerian Kesihatan Malaysia,
3. Menyedia dan menyenggara ‘Daftar Inventori Mesin’ seperti format di Lampiran 1.

Pembekal
Tandatangan :
Tarikh :
Cap Syarikat :

Pembeli
Tandatangan :
Tarikh :
Cap Syarikat :

ANNEX IV

K-FR-29 m/s 2/2

***Nota (Mandatori)**

Sila lampirkan dokumen sokongan seperti berikut:

a) Bagi mengilang keluaran yang berdaftar dengan PBKD-

1. *Salinan lesen mengilang PBKD*
2. *Senarai produk yang akan dikilangkan*

*b) Bagi mengilang keluaran **selain** keluaran yang berdaftar dengan PBKD-*

1. *Maklumat terperinci mengenai produk yang akan dikilangkan*
2. *Dokumen/ sijil/ kelulusan/ pengiktirafan yang dikeluarkan oleh Bahagian Keselamatan dan Kualiti Makanan KKM atau agensi lain yang berkaitan*

ANNEX V

K-FR-30

***LETTER HEAD* SYARIKAT**
ALAMAT PENUH SYARIKAT & NO PENDAFTARAN SYARIKAT

DEKLARASI PENGIMPORTAN MESIN PEMBUAT UBAT

(bagi memenuhi keperluan di bawah *Article 13, United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, 1988*)

Saya memahami bahawa deklarasi ini perlu dikemukakan semasa memohon permit import.

Maklumat Mesin

Jenis Perniagaan Syarikat	
Jenis Mesin, Model & No. Siri	
Kuantiti	
Nama Pembekal dan Alamat	

Tujuan Pembelian: (sila tandakan ☑ dan rujuk nota* di m/s 2)

- ☐ Mengilang keluaran yang berdaftar dengan PBKD[a]
- ☐ Mengilang keluaran **selain** keluaran yang berdaftar dengan PBKD[b]
- ☐ *Demo and display*
- ☐ Penjualan semula (sila kemukakan borang BPF/MPB/2)
- ☐ Lain-lain; Nyatakan:
  ……
  ……

Maklumat & Deklarasi Pembeli

Nama Penuh	
No. Kad Pengenalan	
Jawatan	
Nama dan Alamat Syarikat/ Institusi	
No. Telefon & E-mel	

Saya dengan ini akan mematuhi syarat-syarat berikut;

1. Mesin ini ditempatkan dan digunakan di **alamat premis** seperti berikut (jika berlainan daripada alamat di atas);

   ……

   ……

2. Mesin ini **tidak boleh dipindah milik kepada pihak lain** tanpa kebenaran Bahagian Penguatkuasaan Farmasi, Kementerian Kesihatan Malaysia;
3. Menghantar kepada Bahagian ini salinan **Pesanan Pelanggan dan Deklarasi Pembekalan / Pembelian Mesin Pembuat Ubat** (K-FR-29) sebelum penjualan kepada bakal pembeli dilakukan;
4. Memaklumkan **jenis model dan no. siri mesin** secara bertulis bersama-sama **1 salinan borang kastam import (K1)** dan **invois pembelian** ke Bahagian ini dalam tempoh 30 hari selepas pengimportan selesai.
5. Menyedia dan menyenggara 'Daftar Inventori Mesin' seperti format di Lampiran 1 (bagi pengimportan untuk kegunaan sendiri).

Tandatangan : …… Cap Syarikat :

Tarikh : ……

ANNEX V

K-FR-30 m/s 2/2

***Nota (Mandatori)**

Sila lampirkan dokumen sokongan seperti berikut:

a) Bagi mengilang keluaran yang berdaftar dengan PBKD-

1. *Salinan lesen mengilang PBKD*
2. *Senarai produk yang akan dikilangkan*

*b) Bagi mengilang keluaran **selain** keluaran yang berdaftar dengan PBKD-*

1. *Maklumat terperinci mengenai produk yang akan dikilangkan*
2. *Dokumen/ sijil/ kelulusan/ pengiktirafan yang dikeluarkan oleh Bahagian Keselamatan dan Kualiti Makanan KKM atau agensi lain yang berkaitan*

ANNEX VI

BORANG LAPORAN KEHILANGAN DAN PELUPUSAN BAHAN TERKAWAL
(Keperluan di bawah SOP Pengendalian Bahan/Produk Terkawal)

Klasifikasi laporan:

☐ Kehilangan ☐ Pelupusan
☐ Kecurian ☐ Lain-lain. Sila nyatakan……..

Tarikh kejadian:…… Tempat kejadian:…….

Bil	Nama bahan/produk	Kuantiti	*Huraian / Keterangan
	(Sila tambah lampiran jika ruangan tidak mencukupi		

*Bagi aktiviti pelupusan, perlu nyatakan perkara-perkara berikut:
- Tarikh luput produk bagi produk yang telah tamat tarikh luput
- Tujuan produk dilupuskan sekiranya tarikh luput belum tamat (contoh: kerosakan botol/kotak/ampul, berhenti pengeluaran produk, sisa pengilangan)

*Bagi kes kecurian/kehilangan, perlu nyatakan dan sertakan perkara-perkara berikut:
- Kronologi Kes
- Laporan Siasatan Dalaman
- Lain-lain dokumen tambahan berkiatan kes kecurian/kehilangan

Tindakan yang dilaksanakan oleh syarikat:
☐ Kes kehilangan/kecurian, Laporan Polis telah dibuat (sesalinan laporan polis disertakan)
☐ Pelupusan [sertakan bukti pengesahan oleh Pegawai Penguatkuasa Farmasi Negeri]
☐ Tindakan pembetulan/penambahbaikkan/pencegahan (sila lampirkan huraian dan bukti)
☐ Lain-lain. Sila Nyatakan:
……

Pengakuan Ahli Farmasi
Saya sebagai Ahli Farmasi di syarikat …… yang beralamat di …… mengesahkan semua maklumat yang dilaporkan adalah **sahih**. Adalah menjadi tanggungjawab saya melaporkan perkara ini kepada **Pengarah Penguatkuasaan Farmasi, Kementerian Kesihatan Malaysia** bagi tujuan pemantauan untuk memastikan tiada unsur-unsur penyelewengan bahan/produk terkawal (seperti disenaraikan) berlaku di premis ini.

.....

Nama:
No. Kad Pengenalan:
No. Daftar Lesen A:
Tarikh:
Cop rasmi syarikat:

Saksi Pelupusan oleh Pegawai Penguatkuasa Farmasi Negeri

Saksi 1	Saksi 2
……	……
Nama :	Nama :
Cop Jawatan :	Cop Jawatan :

ANNEX VII

INTERNAL COMPLIANCE CHECKLIST

Code of Practice -

To Prevent the Diversion of Chemicals for the Illicit Manufacture of Narcotic Drugs

The following elements need to be considered and appropriately implemented to ensure internal compliance with this Code.

	Senior management commitment obtained
	Sales and marketing monitoring procedure implemented
	Record-keeping procedure implemented
	Storage and handling procedure including disposal implemented
	Notification of suspicious orders and/or enquiries procedure implemented
	Education and Training procedure implemented
	Liaison Officer(s) appointed
	Code of Practice integrated into standard operating procedures (SOP)
	Regular review period established

Endorsed by:

Name : .....

Designation : .....

Signature : .....

Date : .....

ANNEX VIII

Precursors under the "United Nations Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances 1988"

TABLE I			
	Substance Name	**HS Code**	**CAS Number**
1.	Acetic anhydride	2915.24.00 00	108-24-7
2.	*N*-acetylanthranilic acid	2924.23.00 00	89-52-1
3.	4-anilino-*N*-phenethylpiperidine (ANPP)	2933.39.90 00	21409-26-7
4.	*tert*-Butyl 4-oxopiperidine-1-carboxylate (1-boc-4-piperidone) [iii]	2933.39	79099-07-3
5.	*tert*-Butyl 4-(phenylamino) piperidone-1-carboxylate (1-boc-4-AP)	2933.34	125541-22-2
6.	Ephedrine	2939.41.00 00	299-42-3
7.	Ergometrine	2939.61.00 00	60-79-7
8.	Ergotamine	2939.62.00 00	113-15-5 379-79-3
9.	Isosafrole	2932.91.00 00	120-58-1
10.	Lysergic acid	2939.63.00 00	82-58-6
11.	3, 4-MDP-2-P methyl glycidate (PMK glycidate)	2932.99.90.00	13605-48-6
12.	3,4-MDP-2-P methyl glycidic acid (PMK glycidic acid)	2932.99.90.00	2167189-50-4
13.	3,4-MDP-2-P methyl glycidic acid, ethyl ester [i]	2932.99	28578-16-7
14.	3,4-MDP-2-P methyl glycidic acid, propyl ester [i]	2932.99	N/A
15.	3,4-MDP-2-P methyl glycidic acid, isopropyl ester [i]	2932.99	N/A

TABLE I			
	Substance Name	**HS Code**	**CAS Number**
16.	3,4-MDP-2-P methyl glycidic acid, butyl ester [i]	2932.99	N/A
17.	3,4-MDP-2-P methyl glycidic acid, isobutyl ester [i]	2932.99	N/A
18.	3,4-MDP-2-P methyl glycidic acid, *sec*-butyl ester [i]	2932.99	N/A
19.	3,4-MDP-2-P methyl glycidic acid, *tert*-butyl ester [i]	2932.99	N/A
20.	3,4-methylenedioxy-phenyl-2-propanone (3,4-MDP-2-P)	2932.92.00 00	4676-39-5
21.	Methyl *alpha*-phenylacetoacetate (MAPA)	2918.30.00 00	16648-44-5
22.	Norephedrine	2939.44.00 00	14838-15-4
23.	Norfentanyl	2933.39	1609-66-1
24.	*N*-phenethyl-4-piperidinone (NPP)	2933.39.90 00	39742-60-4
25.	Phenylacetic acid	2916.34.00 00	103-82-2
26.	*alpha*-Phenylacetoacetamide (APAA)	2924.29.90.00	4433-77-6
27.	*alpha*-Phenylacetoacetonitrile (APAAN)	2926.40.00 00	4468-48-8
28.	*N*-phenyl-4-piperidinamine (4-anilinopiperidine, 4-AP)	2933.34.00 00	23056-29-3
29.	1-Phenyl-2-propanone/ Phenylacetone/ Phenylpropan-2-one (P2P)	2914.31.00 00	103-79-7
30.	P-2-P methyl glycidic acid[ii]	2918.99	25547-51-7
31.	P-2-P methyl glycidic acid, methyl ester[ii]	2918.99	8`0532-66-7
32.	P-2-P methyl glycidic acid, ethyl ester[ii]	2918.99	41232-97-7

TABLE I			
	Substance Name	**HS Code**	**CAS Number**
33.	P-2-P methyl glycidic acid, propyl ester[ii]	2918.99	N/A
34.	P-2-P methyl glycidic acid, isopropyl ester[ii]	2918.99	N/A
35.	P-2-P methyl glycidic acid, butyl ester[ii]	2918.99	N/A
36.	P-2-P methyl glycidic acid, isobutyl ester[ii]	2918.99	N/A
37.	P-2-P methyl glycidic acid, *sec*-butyl ester[ii]	2918.99	N/A
38.	P-2-P methyl glycidic acid, *tert*-butyl ester[ii]	2918.99	N/A
39.	4-Piperidone[iii]	2933.39	41661-47-6
40.	Piperonal	2932.93.00 00	120-57-0
41.	Potassium permanganate	2841.61.00 00	7722-64-7
42.	Pseudoephedrine	2939.42.00 00	90-82-4
43.	Safrole	2932.94.00 00	94-59-7

Notes:
- The salts of the substances listed in this Table whenever the existence of such salts is possible.
- N/A: Not applicable
- This list of precursors will be updated as needed and aligned with the listing of precursors under the Red List of the 1988 Convention.

i. Seven esters of 3,4-MDP-2-P methyl glycidic acid were included in Table 1 of the 1988 Convention effective 3 December 2024 [waiting to be listed under First Schedule, Poisons Act 1952, Customs (Prohibition of Import) Order 2023 and Customs (Prohibition of Export) Order 2023].

ii. P-2-P methyl glycidic acid and eight of its esters were included in Table 1 of the 1988 Convention effective 3 December 2024 [waiting to be listed under First Schedule, Poisons Act 1952, Customs (Prohibition of Import) Order 2023 and Customs (Prohibition of Export) Order 2023].

iii. 1-Boc-4-piperidone and 4-piperidone were included in Table 1 of the 1988 Convention effective 3 December 2024. [waiting to be listed under First Schedule, Poisons Act 1952, Customs (Prohibition of Import) Order 2023 and Customs (Prohibition of Export) Order 2023].

ANNEX VIII

TABLE II			
	Substance Name	**HS Code**	**CAS Number**
1	Acetone	2914.11.00 00	67-64-1
2	Anthranilic acid	2922.43.00 00	118-92-3
3	Ethyl ether (Diethyl ether)	2909.11.00 00	60-29-7
4	Hydrochloric acid (Hydrogen chloride)	2806.10.00 00	7647-01-0
5	Methyl ethyl ketone (Butanone)	2914.12.00 00	78-93-3
6	Piperidine	2933.32.00 00	110-89-4
7	Sulphuric acid	2807.00.00 00	7664-93-9
8	Toluene	2902.30.00 00	108-88-3

Notes:

- The salts of the substances listed in this Table whenever the existence of such salts is possible.
- The salts of hydrochloric and sulphuric acid are specifically excluded from Table II
- This list of precursors will be updated as needed and aligned with the listing of precursors under the Red List of the 1988 Convention.

ANNEX IX

Matrix of the control on scheduled precursors are as tabled below:

	Name of Precursor	Poisons Act 1952 (Type of license)	Sale of Drugs Act 1952 and its Regulation	Customs Prohibitory Order
1.	Acetic anhydride	A	N/A	Import/export
2.	*N*-Acetylanthranilic acid	A/B	N/A	Import/export
3.	4-anilino-*N*-phenethylpiperidine (ANPP)	A/B	N/A	Import/export
4.	*tert*-Butyl 4-oxopiperidine-1-carboxylate (1-boc-4-piperidone)	Waiting to be listed under First Schedule, Poisons Act 1952, Customs (Prohibition of Import) Order 2023 and Customs (Prohibition of Export) Order 2023.		
5.	*tert*-Butyl 4-(phenylamino) piperidone-1-carboxylate (1-boc-4-AP)	A/B	N/A	Import/export
6.	Ephedrine (including pharmaceutical preparations containing Ephedrine hydrochloride / sulfate)	A	Manufacture/ import/ wholesale	Import/export
7.	Ergometrine (INN) and its salts	A	Manufacture/ import/ wholesale	Import/export
8.	Ergotamine (INN) and its salts	A	Manufacture /import/ wholesale	Import/export
9.	Isosafrole	A/B	N/A	Import/export
10.	Lysergic acid	A	N/A	Import/export
11.	3, 4-MDP-2-P methyl glycidate (PMK glycidate)	A/B	N/A	Import/export
12.	3,4-MDP-2-P methyl glycidic acid (PMK glycidic acid)	A/B	N/A	Import/export
13.	3,4-MDP-2-P methyl glycidic acid, ethyl ester	Waiting to be listed under First Schedule, Poisons Act 1952, Customs (Prohibition of Import) Order 2023 and Customs (Prohibition of Export) Order 2023.		
14.	3,4-MDP-2-P methyl glycidic acid, propyl ester			

	Name of Precursor	Poisons Act 1952 (Type of license)	Sale of Drugs Act 1952 and its Regulation	Customs Prohibitory Order
15.	3,4-MDP-2-P methyl glycidic acid, isopropyl ester			
16.	3,4-MDP-2-P methyl glycidic acid, butyl ester	Waiting to be listed under First Schedule, Poisons Act 1952, Customs (Prohibition of Import) Order 2023 and Customs (Prohibition of Export) Order 2023.		
17.	3,4-MDP-2-P methyl glycidic acid, isobutyl ester			
18.	3,4-MDP-2-P methyl glycidic acid, *sec*-butyl ester			
19.	3,4-MDP-2-P methyl glycidic acid, *tert*-butyl ester			
20.	3,4-methylenedioxy-phenyl-2-propanone (3,4-MDP-2-P)	A/B	N/A	Import/export
21.	Methyl *alpha*-phenylacetoacetate (MAPA)	A/B	N/A	Import/export
22.	Norephedrine and its salts	A	Prohibited	Import/export
23.	Norfentanyl	A	Manufacture/ import/	Import/export
24.	*N*-phenethyl-4-piperidinone (NPP)	A/B	N/A	Import/export
25.	Phenylacetic acid	A/B	N/A	Import/export
26.	*alpha*-phenylacetoacetamide (APAA) (including its optical isomers)	A/B	N/A	Import/export
27.	*alpha*-phenylaceto acetonitrile (APAAN)	A/B	N/A	Import/export
28.	*N*-Phenyl-4-piperidinamine (4-AP) (4-anilinopiperidine)	A	N/A	Import/export
29.	1-Phenyl-2-propanone/ Phenylacetone/ Phenylpropan-2-one (P2P)	A/B	N/A	Import/export

	Name of Precursor	Poisons Act 1952 (Type of license)	Sale of Drugs Act 1952 and its Regulation	Customs Prohibitory Order
30.	P-2-P methyl glycidic acid	A/B	N/A	
31.	P-2-P methyl glycidic acid, methyl ester	Waiting to be listed under First Schedule, Poisons Act 1952, Customs (Prohibition of Import) Order 2023 and Customs (Prohibition of Export) Order 2023.		
32.	P-2-P methyl glycidic acid, ethyl ester			
33.	P-2-P methyl glycidic acid, propyl ester			
34.	P-2-P methyl glycidic acid, isopropyl ester			
35.	P-2-P methyl glycidic acid, butyl ester			
36.	P-2-P methyl glycidic acid, isobutyl ester			
37.	P-2-P methyl glycidic acid, *sec*-butyl ester			
38.	P-2-P methyl glycidic acid, *tert*-butyl ester			
39.	4-Piperidone			
40.	Piperonal	A/B	N/A	Import/export
41.	Potassium permanganate	A /B	N/A	Import/export
42.	Pseudoephedrine and its salts (including pharmaceutical preparations Pseudoephedrine hydrochloride / sulfate)	A	Manufacture/ import/ wholesale	Import/export
43.	Safrole	A/B	N/A	Import/export
44.	Acetone	N/A	N/A	Export
45.	Anthranilic acid	A/B	N/A	Export
46.	Diethyl ether (Ethyl ether)	A /B	N/A	Export

	Name of Precursor	Poisons Act 1952 (Type of license)	Sale of Drugs Act 1952 and its Regulation	Customs Prohibitory Order
47.	Hydrogen chloride (Hydrochloric acid)	A/B	N/A	Export
48.	Methyl ethyl ketone	N/A	N/A	Export
49.	Piperidine and its salts	A/B	N/A	Export
50.	Sulphuric acid	A/B	N/A	Export
51.	Toluene	N/A	N/A	Export

N/A: Not applicable

LIST OF REFERENCES

1 Poisons Act 1952

2 Sale of Drugs Act 1952

3 Customs Act 1967

4 Guidelines for A Voluntary Code of Practice for The Chemical Industry (2009, INCB)

5 Code of Conduct – To Protect Against the Diversion of Chemicals for The Illicit Productions of Drugs (2006)

6 Voluntary Code of Conduct (VCC) For Trade and Industry - For Preventing the Diversion of Precursors and Essential Chemicals Notified in Table-I & II of The UN Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, 1988 (UNODC, Regional Office for South Asia)

7 Code of Practice for Supply Diversion into Illicit Drug Manufacture (Version Five, 005) (Inter-Governmental Committee on Drugs, Australia)