

Health and Safety Office - Guidance Note

Topic:	Purchase, Use and Storage of named Drug Precursors
Date:	Feb 2011
Version:	V1.1
Scope:	<p>This guidance aims to provide clarification on the following:</p> <ul style="list-style-type: none"> • what constitutes a Drug Precursor; • the requirements for purchasing Drug Precursors; • the requirements for storing Drug Precursors; • the need for stock control.
Relevant Legislation:	Various EU Regulations
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1. Introduction:

The University of Bristol has duties imposed by the Home Office under the various European regulations with regard to the monitoring of trade in Drug Precursors within the EU and between the Community and third countries. These regulations can be seen at

<http://ec.europa.eu/enterprise/sectors/chemicals/documents/specific-chemicals/precursors/>

2. Scope of the guidance:

The Home Office has specified by their interpretation of the EU legislation their requirements for all establishments that may use Drug Precursors.

This guidance is aimed at Schools that may use or wish to use Category 1 Drug Precursors (see definition below) for any reason within the usual bounds of research and teaching. Further guidance on less sensitive precursors and other specifically controlled substances may be found in other guidance from the Health and Safety Office.

Licenses are needed to demonstrate proper control, and establish efficient two-way reporting mechanisms, within users and between the Home Office and the University.

3. Definition: A Drug Precursor is defined as a substance that can be, and is being, used to manufacture synthetic drugs that may then be traded illicitly. Some are specific with well established routes of drug manufacture (Category 1); others are extremely common chemicals that may be found in most laboratories.

Precursors by list: Common name followed by EU designated "CN Code" number for each.

3.1 Category 1 Drug Precursors:

Ephedrine 2939 4100
Ergometrine 2939 6100
Ergotamine 2939 6200
Lysergic Acid 2939 6300
1-phenyl-2-propanone (BMK) 2914 3100
Pseudoephedrine 2939 4200
N-acetylanthranilic Acid 2924 2300
3-4 Methylenedioxy-Phenylpropan-2-one (PMK) 2932 9200
Isosafrole 2932 9100
Piperonal 2932 9300
Safrole 2932 9400
Norephedrine 2939 4900

3.2 Category 2 (for reference):

Acetic Anhydride 2915 2400
Potassium Permanganate 2841 6100
Anthranilic Acid 2922 4300
Phenylacetic Acid 2916 3400
Piperidine 2933 3200

3.3 Category 3 (for reference):

Acetone 2914 1100
Ethyl Ether 2909 1100
Methyl Ethyl Ketone (MEK) 2914 1200
Toluene 2902 3000
Sulphuric Acid 2807 0010
Hydrochloric Acid 2806 1000

4. Requirements within the University:

4.1 Purchase, Use and Storage of **Category 1** Precursors:

The Home Office, as enforcing agents in UK to regulate the legislation for the EU, have stated that they wish to liaise directly with user Departments, and as such require each building/ department to have its own Licences held by a local **Responsible Officer** as nominated by a local **Guarantor**. It is suggested that the first should be involved in technical aspects of ordering/inventory/storage, and the latter possibly the Head of Department or Deputy. The Chemical Safety Advisor in the Health and Safety Officer may act as a central contact point, but responsibility to choose personnel rests within user departments.

<http://www.homeoffice.gov.uk/drugs/licensing/precursor-forms/>

These two representatives (for each building/department) both need to be CRB checked before application following the method described below:

<http://www.capitarvs.co.uk/drug-licensing-and-compliance-unit> (There is a guide link towards the foot of this page).

The application form for a Licence can be found at:

<http://www.homeoffice.gov.uk/publications/drugs/drug-licences/category1-subsp1?view=Binary>

and

<http://www.homeoffice.gov.uk/publications/drugs/drug-licences/category1-subsp2?view=Binary>

With an example shown at

<http://www.homeoffice.gov.uk/publications/drugs/drug-licences/guidance-completing-ec-dom-lic?view=Binary>

Before any Licence is issued however, the Home Office will need to physically inspect the facilities for storage, security, and inventory control must be demonstrated as being adequate for their needs.

- 4.2 Without a Licence, it should not be possible to purchase any Category 1 substance. If however such items are already in existence, or are procured outside the limitations of Licence control ie from a rogue supplier, it is an offence for the department to hold or use these substances.
- 4.3 Strict measures of inventory control and a fully auditable usage system, including disposal entries will be a requirement. This will also apply to lower risk substances (Cat 2 and 3) and explosive precursors that are not covered by the Licence, but fall within other security interests eg Serious Organised Crime Agency (SOCA) and the local police Counter Terrorism Security Advisors (CTSA) – contact the Chemical Safety Advisor for details.
- 4.4 Storage of vulnerable substances must be secure, and all staff should be trained to be aware of the risks, alert to any suspicious activity, and told how to report same. Suitable storage must be decided following a risk assessment taking account of the substance, the amounts, and who has access. For Category 1 Drug Precursors, they will need to be double locked and it will be demanded that the Responsible Person has **direct** key control. It may be necessary to have electronic security and CCTV coverage. This will all be advised on inspection by the Home Office on the application for licensing and during their formal annual review inspection.
- 4.5 At present, there are no formal requirements on users of Category 2 or 3 Drug Precursors, but it is strongly advised that all the management principles are followed (local Inventory, stock control, security and inspection), but no Licence is required.

5.0 References and acknowledgements

SOCA(see 4.3) - <http://www.soca.gov.uk/>

CTSA (see 4.3)-
http://www.avonandsomerset.police.uk/community_safety/ctsa/

European Commission
<http://ec.europa.eu/enterprise/sectors/chemicals/documents/specific-chemicals/precursors/>

Flowchart of Home Office requirements for Drug Precursors:
<http://www.homeoffice.gov.uk/publications/drugs/drug-licences/wallchart-march-2010?view=Binary>

Any queries:

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