

1. Scope

The Home Office has specified (by their interpretation of the EU legislation) their requirements for all establishments that use drug precursor chemicals.

This guidance is aimed at Schools that may use or wish to use Category 1 or 2 Drug Precursors (see definition below) for any reason within the usual bounds of research and teaching. This guidance aims to provide clarification on the following:

- what constitutes a Drug Precursor;
- the requirements for purchasing Drug Precursors;
- the requirements for storing Drug Precursors;
- the need for reporting annual returns.

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3. 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/>

The Home Office are the UK enforcing agency for this legislation, full details of their requirements for purchasing and using drug precursor chemicals can be found at

<https://www.gov.uk/precursor-chemical-licensing>

4. Definition of a drug precursor.

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 drug precursors are specific substances with well-established routes of drug manufacture (Category 1); others may be common chemicals found in most laboratories (Category 2 and 3).

4.1 Category 1 Drug Precursors.

Ephedrine
Ergometrine
Ergotamine
Lysergic Acid
1-phenyl-2-propanone (BMK)
Pseudoephedrine
N-acetylanthranillic Acid
3-4 Methyleneoxy-Phenylpropan-2-one (PMK)
Isosafrole
Piperonal
Safrole
Norephedrine
Alpha-phenylacetoacetonitrile (APAAN)

4.2 Category 2 Drug Precursors

Acetic Anhydride
Potassium Permanganate
Anthranilic Acid
Phenylacetic Acid

Piperidine

4.3 Category 3 Drug Precursors

Acetone

Ethyl Ether

Methyl Ethyl Ketone (MEK)

Toluene

Sulphuric Acid

Hydrochloric Acid

5. Licence Requirements

- Schools possessing Category 1 drug precursors must have a valid domestic licence issued by the Drugs Licencing and Compliance Unit, Home Office (DLCU). It is an offence to obtain, hold or use Category 1 substances without a valid licence.
- The DLCU require each School to hold its own licence, Schools should ensure an appropriate person is nominated as the named Responsible Officer for the licence application and a second individual as Guarantor. The University Chemical Safety Adviser can act as a central contact point during the application process but responsibility to choose suitable personnel rests within user Schools/Services. The application form for a Category 1 drug precursor licence can be found at

<https://www.gov.uk/licence-to-possess-or-sell-drug-precursors>

- Licence application fees apply and are the responsibility of the School or user department.
- Individuals acting as the Responsible person and Guarantor must provide a Disclosure and Barring Service (DBS) enhanced disclosure as part of the application procedure. Capita Recruitment Vetting Service (CRVS), deliver a scheme to enable DLCU licence applicants to obtain DBS enhanced disclosures for drug precursor applications.

<http://www.capitarvs.co.uk/enhanced-crb>

- Before any licence is issued, the Home Office will need to inspect the facilities to ensure appropriate arrangements are in place for storage, security and inventory control.
- Schools applying for a Category 1 licence must inform the University Chemical Safety Advisor of their intentions and the substances they intend to hold.

6. Local Arrangements.

- Schools/Services should ensure arrangements are in place for the secure, storage and disposal of category 1 chemicals, access should be restricted to authorised individuals and that the use of these substances is regularly monitored. Activities must be covered by documented, safe operating procedures.
- The locally named Responsible Person should have direct key control to Category 1 precursor storage facilities which may require electronic security and CCTV coverage.
- At present there are no formal requirements on users of Category 2 or 3 drug precursors, but it is strongly advised that all management principles are followed (inventory, stock control, security and inspection).
- Staff purchasing Category 1 and 2 precursors must complete a 'Declaration of Specific Uses Form' prior to purchase.
- Schools/Services should ensure that fully auditable records are maintained of all Category 1 and 2 precursor chemicals they hold and use, records should include:
 1. Supplier,
 2. Date of purchase
 3. Person responsible
 4. Amount
 5. Date of disposal
 6. Amounts disposed.
- Schools/Services must report all losses or theft of Category 1 and 2 chemicals to the DLCU using a form which may be obtained via the following link
<https://www.gov.uk/precursor-chemical-licensing>
- Details of the loss should be copied immediately to Security and Safety and Health Services.

7. Precursor chemical annual returns

- Schools/Services must submit an annual return of all Category 1 and 2 precursor chemical usage to Safety and Health Services. The following form should be completed and forwarded to the University Chemical Safety Adviser who will collate and report an annual declaration of Category 1 and 2 Precursor Chemical use on behalf of the University of Bristol to the Home Office.

Drug Precursor Use Returns

Category 1, 2 and 3 chemicals

Controlled Drugs (Drug Precursors) (Intra-Community Trade) Regulations 2008 (SI 2008 No. 29)

School/Service			
Completed by		Date	

Category 1 chemicals					
Schools holding these substances must possess a Home Office Drugs Precursor License.					
		CAS number	Amount held	Amount used this calendar year.	Licence is held by the School (Yes/No)
1.	Ephedrine	299-42-3			
2.	Ergometrine	60-79-7			
3.	Ergotamine	113-15-5			
4.	1-phenyl-2-propanone (BMK)	103-79-7			
5.	Pseudoephedrine	90-82-4			
6.	N-acetylanthranilic Acid	89-52-1			
7.	3-4 Methylenedioxy-Phenylpropan-2-one (PMK)	4676-39-5			
8.	Isosafrole	120-58-1			
9.	Piperonal	120-57-0			
10.	Safrole	94-59-7			

11	Norephedrine	14838-15-4			
12	Alpha-phenylacetoacetonitrile (APAAN)	4468-48-8			

Category 2 chemicals

For Reference only – End User declarations may be required by suppliers when ordering.

		CAS number	Tick if held by the School
1.	Acetic Anhydride	108-24-7	
2.	Potassium Permanganate	7722-64-7	
3.	Phenylacetic Acid	103-82-2	
4.	Anthranillic Acid	118-92-3	
5.	Piperidine	110-89-4	

Category 3 chemicals

For Reference only – No additional action required

		CAS number	Tick if held by the School
1.	Acetone	67-64-1	
2.	Ethyl Ether	60-29-7	
3.	Methyl Ethyl Ketone	78-93-3	
4.	Toluene	108-88-3	
5.	Sulphuric Acid	7664-93-9	
6.	Hydrochloric Acid	7647-01-0	

Signed		Date