



Pre-Export Notifications

By

Aziz Elkholy

Staff Coordinator

Smita Patel

Program Analyst

Synthetic Drugs & Chemicals Section

International Chemical Control

International Narcotics Control Board (INCB)

- United Nations
- Independent monitoring body for the implementation of the international drug control conventions.
- Established in 1968 in accordance with the Single Convention on Narcotic Drugs, 1961.

1988 U.N. Convention Against Illicit Traffic and Narcotic Drugs and Psychotropic Substances

Pre-Export Notifications

- **PEN Online system launched in March 2006 by INCB**
 - ❖ On average, more than 2,600 pre-export notifications are communicated through PEN Online System each month.
 - ❖ DEA has sent approximately 49,400 PEN notifications to date.
- **Information shared through PEN Online enables monitoring of licit global trade at the country and company levels**
 - ❖ Allows importing country to verify legitimacy of shipment and suspend or stop it in timely manner
- **Enables Governments to rapidly identify suspicious transactions of substances in Table I and II of 1988 UN Treaty, thus prevent potential diversion**

Global Chemical Control: *Substances in Tables I and II of the 1988 Convention*

Table I

Acetic anhydride
N-Acetylanthranilic acid
Ephedrine
Ergometrine
Ergotamine
Isosafrole
Lysergic acid
3,4-Methylenedioxyphenyl-2-propanone
Norephedrine
Phenylacetic acid^b
1-Phenyl-2-propanone
Piperonal
Potassium permanganate
Pseudoephedrine
Safrole

Table II

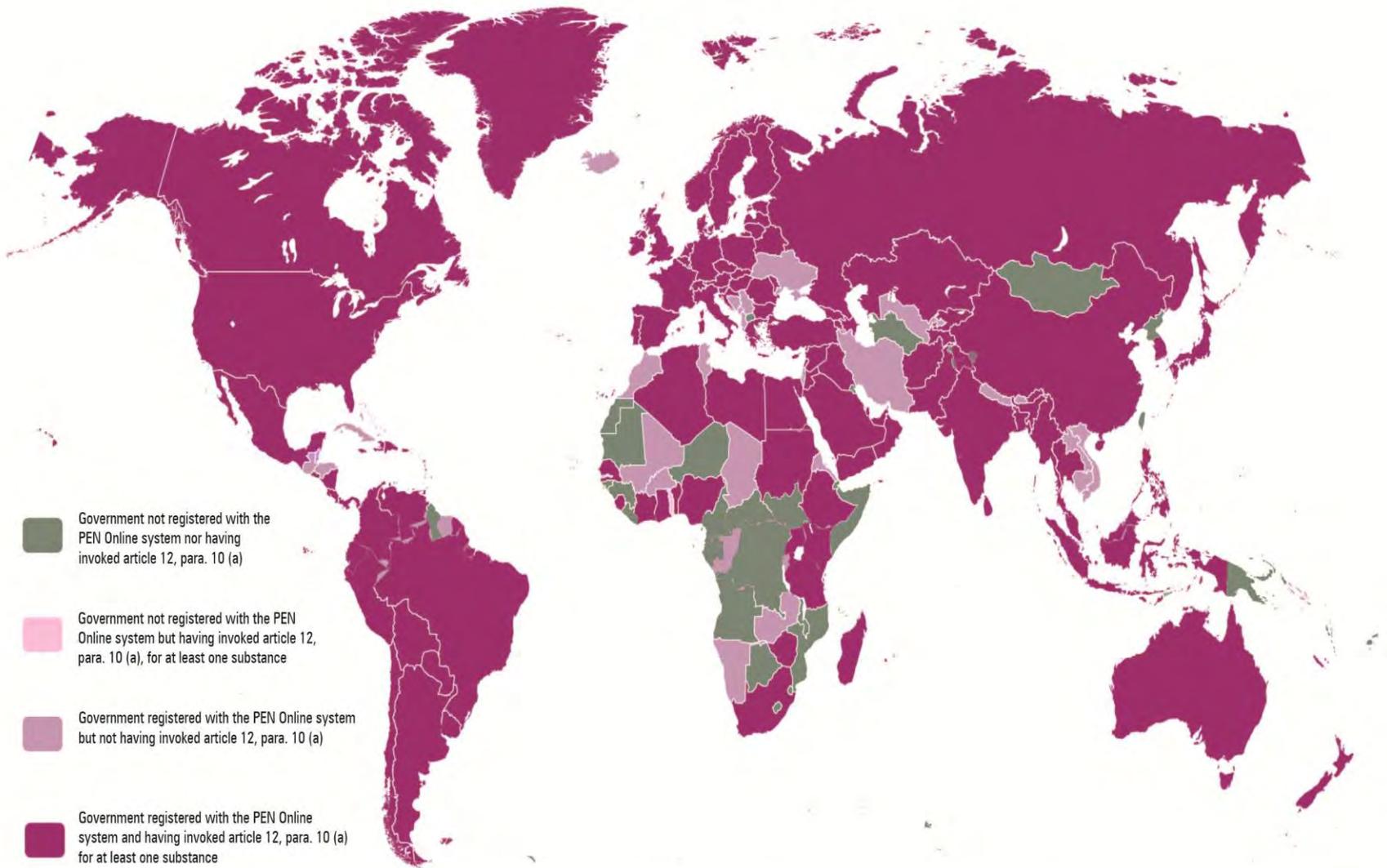
Acetone
Anthranilic acid
Ethyl ether
Hydrochloric acid^a
Methyl ethyl ketone
Piperidine
Sulphuric acid^a
Toluene

USA Listed Chemicals Regulated Under the Controlled Substances Act

Listed Chemicals Regulated Under the Controlled Substances Act		CONTROLLED SUBSTANCE PRODUCED														THRESHOLDS				
See 21 C.F.R. §§ 1309, 1310, 1313 and 1314 for details		Amphetamine	Cocaine	N,N-Dimethylamphetamine	Ethylamphetamine	Feranyl & analogues	GBH	Heroin	LSD	MDA	MDE	MDMA	Methamphetamine	Methqualone	Mecathione	4-Methylaminorex	Phencyclidine (PCP)	Phenyl-2-propanone	DOMESTIC	IMPORTS & EXPORTS
August 14, 2011		Reagent =  Precursor =  Solvent = 																		
1	N-Acetylanthranilic acid ²																	40	40	
2	Anthranilic acid ²																	30	30	
3	Benzaldehyde	▲												▲				4	4	
4	Benzyl cyanide																	1	1	
5	Ephedrine ^{3a}												▲		▲			0	0	
6	Ergocristine ¹								▲									0	0	
7	Ergonovine ¹								▲									0.010	0.010	
8	Ergotamine ¹								▲									0.020	0.020	
9	Ethylamine ¹				▲					▲								3	1	
10	gamma-Butyrolactone (GBL)					▲												0	0	
11	Hydroiodic acid																	3.7	1.7	
12	Hypophosphorous acid ¹	■											■					0	0	
13	Iodine	■											■					0	0	
14	Isosafrole									▲								4	4	
15	Methylamine ¹									▲		▲						1	1	
16	3,4-Methylenedioxyphenyl-2-propanone									▲		▲						4	4	
17	N-Methylephedrine ¹			▲						▲		▲						1	1	
18	N-Methylpseudoephedrine ¹			▲														1	1	
19	N-phenethyl-4-piperidone (NPP)					▲												0	0	
20	Nitroethane	▲								▲								2.5	2.5	
21	Norpseudoephedrine ¹	▲																2.5	2.5	
22	Phenylacetic acid ²																	1	1	
23	Phenylpropanolamine ^{3a}	▲																2.5	2.5	
24	Phosphorus (red)	■											■					0	0	
25	Phosphorus (white or yellow)	■											■					0	0	
26	Piperidine ¹																	0.500	0.500	
27	Piperonal (heliotropin)									▲		▲						4	4	
28	Propionic anhydride					▲												0.001	0.001	
29	Pseudoephedrine ^{3a}												▲		▲			1	1	
30	Safrole									▲		▲						4	4	
31	Acetic anhydride									▲		▲						1,023	1,023	
32	Acetone		●							●		●		▲				150	1,500	
33	Benzyl chloride												▲					1	4	
34	Ethyl ether	●	●							●		●	●	●	●			135.8	1,364	
35	Hydrochloric acid ^{3a}	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	N/C	222.3	
35a	Hydrogen chloride gas ^{3a}	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	0	27	
36	Methyl ethyl ketone (2-Butanone)		●							●		●						145	1,455	
37	Methyl isobutyl ketone ¹									●		●						N/C	1,523	
38	Potassium permanganate		■															55	500	
39	Sodium permanganate		■															55	500	
40	Sulfuric acid ^{3a}	■	■							■		■						N/C	347	
41	Toluene		●			●							●					159	1,591	

¹ and its salts
² and its salts and esters
³ and its salts, optical isomers, and salts of optical isomers
⁴ Exports only, to all Western Hemisphere except Canada
⁵ Exports to all South American countries & Panama - Domestic for HCl gas
⁶ Threshold for HCl acid and sulfuric acid is 50 gallons, the equivalent weight in kilograms is shown
⁷ For pseudoephedrine, phenylpropanolamine and ephedrine drug products, see 21 USC § 802(45)(A) and 21 C.F.R. Part 1314
 N/C = Not Controlled

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 Wynn Austin



The boundaries and names shown and the designation used on this map do not imply official endorsement or acceptance by the United Nations. Final boundary between

International Arena

PENs system help....

- **Track shipments around the globe**
- **Strengthen communication and cooperation with foreign governments on chemicals of interest**
- **Provides information on trends of chemicals for analysis to support establishing adequate chemical controls**

DEA Form 486

U.S. Department of Justice

Import / Export Declaration for List I and List II Chemicals

Drug Enforcement Administration

SEE REVERSE INSTRUCTIONS FOR PRIVACY ACT

OMB Approval No. 1117-0023

1a. Type of Transaction IMPORT EXPORT INTERNATIONAL 1b. Type of Submission ORIGINAL AMENDED WITHDRAWAL

1c. **WARNING!** 15-day advance notice required for initial shipment or for company that has lost regular importer or regular customer status. See 21 C.F.R. Part 1313 for further details.
 I certify I have met the conditions for the waiver of 15-day advance notice requirement.

DEA Transaction Number

2a. U.S. IMPORTER/ U.S. EXPORTER / U.S. BROKER
(Name, address, telephone, and fax no.)

2b. IF IMPORT, LIST FOREIGN CONSIGNOR; IF EXPORT OR INTERNATIONAL TRANSACTION, LIST FOREIGN TRANSFEREE.
(Name, address, telephone, and fax no.)

DEA Registration Number (for List I only): _____

Purchase/Invoice no. _____

Foreign permit no. (if applicable) _____

3. Listed Chemicals to be Imported / Exported / Brokered

3a. Name and Description of chemical appearing on label or container. For drug products, show dosage strength and dosage size.

3b. Name of chemicals as designated by Title 21 C.F.R. 1310.02

3c. Number of containers, size, net weight of each chemical (kg). For drug products, show number of dosage units. Show net total weight per chemical.

3d. DATE OF ACTUAL IMPORT/EXPORT AND ACTUAL QUANTITY (To be completed by person named in (2a).) If same as 3c, write "same as 3c."

4a. FOREIGN DOMESTIC

PORT OF EXPORTATION: _____

APPROX. DEPARTURE DATE: _____

4b. FOREIGN DOMESTIC

PORT OF IMPORTATION: _____

APPROX. ARRIVAL DATE: _____

5. MODE OF TRANSPORTATION, NAME OF VESSEL, OR NAME OF CARRIER: _____

SIGNATURE OF AUTHORIZED INDIVIDUAL (Print or Type Name below
Signature)

DATE: _____

Print Name:

DEA form - 486 (Previous version obsolete.)
11/30/2019

Copy 1

PENs Issues

Objections by Foreign National Competent Authorities

1. Administrative errors (i.e. address, quantity, esters)
2. Import permits
3. technical (system issues)



Letters of No-Objections (LONOS)

By

Aziz Elkholy

Staff Coordinator

Smita Patel

Program Analyst

Synthetic Drugs & Chemicals Section

Letters of No Objection (LONO)

1988 UN Convention treaty provisions, some nations implemented permit system for import/export of listed controlled chemicals

- U.S. does not have a permit system

1994 INCB initiative resulted in the LONO

- US meets its treaty obligations under Article 12 of 1988 Convention and via DEA CSA, 21 U.S.C. 872 (f) and 21 U.S.C 971
- Informal bilateral agreements negotiated between U.S and China, Hong Kong, India and the Czech Republic
- LONO another form of verification issued by U.S. to allow particular imports into the United States

LONO Process

Imports of listed chemicals require DEA 486 declaration

- ❖ U.S companies submit DEA 486 to Import/Export Unit(via online or fax) - process the DEA 486
- ❖ Synthetic Drugs and Chemical Section verifies the import and issues Letter of No Objection
- ❖ Discontinued issuance of LONO to India

Letter of No Objection issued to the Competent National Authority of exporting country

DEA Form 486

U.S. Department of Justice

Import / Export Declaration for List I and List II Chemicals

Drug Enforcement Administration

SEE REVERSE INSTRUCTIONS FOR PRIVACY ACT

OMB Approval No. 1117-0023

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1b. Type of Submission: ORIGINAL AMENDED WITHDRAWAL

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 I certify I have met the conditions for the waiver of 15-day advance notice requirement.

DEA Transaction Number

2a. U.S. IMPORTER/ U.S. EXPORTER / U.S. BROKER
(Name, address, telephone, and fax no.)

2b. IF IMPORT, LIST FOREIGN CONSIGNOR; IF EXPORT OR INTERNATIONAL TRANSACTION, LIST FOREIGN TRANSFEREE.
(Name, address, telephone, and fax no.)

DEA Registration Number (for List I only):

Purchase/Invoice no.:

Foreign permit no. (if applicable):

3. Listed Chemicals to be Imported / Exported / Brokered

3a. Name and Description of chemical appearing on label or container. For drug products, show dosage strength and dosage size.

3b. Name of chemicals as designated by Title 21 C.F.R. 1310.02

3c. Number of containers, size, net weight of each chemical (kg). For drug products, show number of dosage units. Show net total weight per chemical.

3d. DATE OF ACTUAL IMPORT/EXPORT AND ACTUAL QUANTITY (To be completed by person named in (2a).) If same as 3c, write "same as 3c."

4a. FOREIGN DOMESTIC

PORT OF EXPORTATION:

APPROX. DEPARTURE DATE:

4b. FOREIGN DOMESTIC

PORT OF IMPORTATION:

APPROX. ARRIVAL DATE:

5. MODE OF TRANSPORTATION, NAME OF VESSEL, OR NAME OF CARRIER:

SIGNATURE OF AUTHORIZED INDIVIDUAL (Print or Type Name below Signature)

DATE:

Print Name:

DEA form - 486 (Previous version obsolete.)
11/30/2019

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LONO



U. S. Department of Justice
Drug Enforcement Administration

Springfield, Virginia 22152

www.dea.gov

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Ministry of Public Security
14 Dong Chang An Street
Beijing, China 100741

Dear Mr. Wang:

The U.S. Drug Enforcement Administration (DEA) has received a request for a letter of no objection for the following shipment:

U.S. Importer:	Company name Street address City, State Zip
Exporter:	Company name Address Address City, Zip, China
DEA Transaction No.:	XXXXXXX
Chemical:	Name
Quantity:	XXX kilograms
Importer Ref. No.:	PO #XXXX

Please be advised the DEA currently has no objection to this proposed shipment. This non-objection only applies to the shipment identified above and a copy of this letter will be sent to the U.S. importer.

Any questions regarding this letter may be directed to this office at (202) 307-4780.

Sincerely,

John R. Scherbenske, Section Chief
Synthetic Drugs and Chemicals Section



Thank You Questions?

Aziz Elkholy

Staff Coordinator

Aziz.Elkholy@USdoj.gov

Smita Patel

Program Analyst

Smita.Patel2@USdoj.gov

Synthetic Drugs & Chemicals Section