

U.S. Department of Justice
Drug Enforcement Administration
Office of Diversion Control

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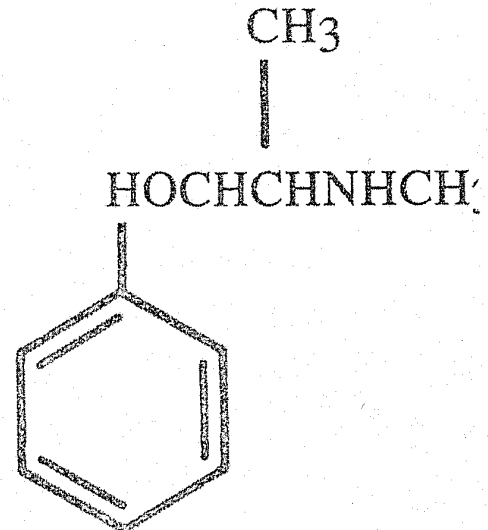
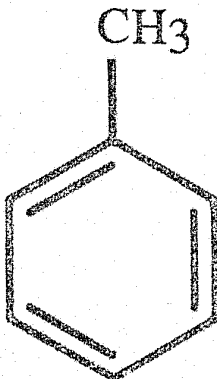
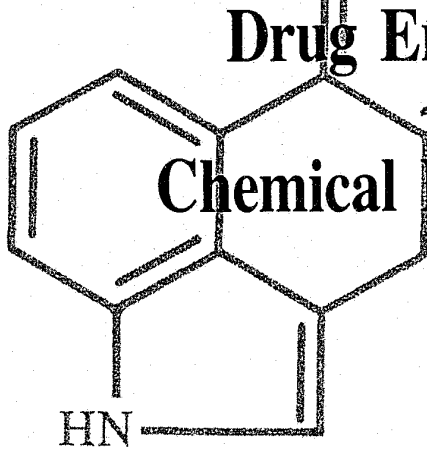
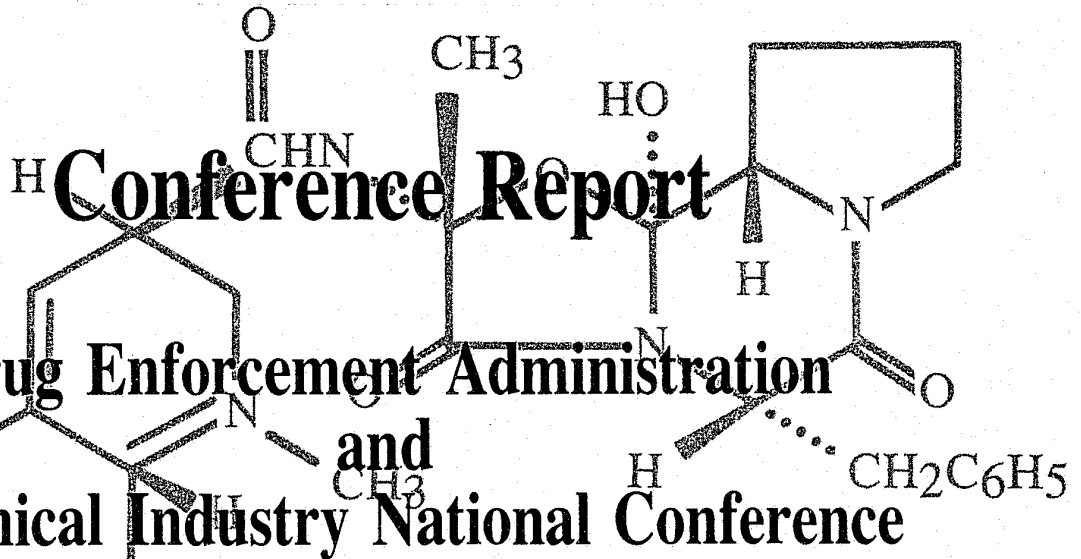
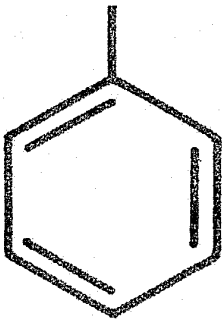
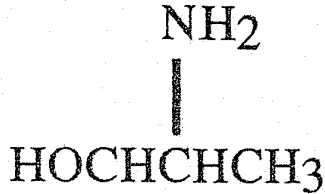
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Philadelphia, Pennsylvania
November 14-15, 1988

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CONFERENCE REPORT
ON THE
DRUG ENFORCEMENT ADMINISTRATION
AND
CHEMICAL INDUSTRY NATIONAL CONFERENCE
SPONSORED BY THE
OFFICE OF DIVERSION CONTROL
DRUG ENFORCEMENT ADMINISTRATION
U.S. DEPARTMENT OF JUSTICE

NOVEMBER 14-15, 1988

PHILADELPHIA, PENNSYLVANIA

INTRODUCTION

On November 14 and 15, 1988, representatives of 53 chemical companies and national associations from all parts of the country and representatives of the Drug Enforcement Administration (DEA) gathered in Philadelphia, Pennsylvania, to discuss the Chemical Diversion and Trafficking Act of 1988. This legislation was signed into law by President Reagan on November 18, 1988.

The purpose of the conference was threefold: to acquaint the chemical industry with the DEA's functions, responsibilities and organization; to define the provisions of the new legislation; and to describe how this new legislation will impact on both the DEA and the chemical industry.

This is the report on the conference.

OPENING REMARKS

Mr. S. D. Billbrough, Special Agent in Charge of the DEA's Philadelphia Division, opened the conference by stressing the importance of the chemical legislation and the role of legitimate industry. He emphasized that the public at large must take a prominent role in the battle against drug abuse and trafficking and that the DEA could not do it alone. He noted how the self-regulation program of the pharmaceutical industry has assisted the DEA

in its quest to curtail drug diversion, and how that cooperative spirit would continue with the provisions of the Chemical Diversion and Trafficking Act. Mr. Billbrough concluded his remarks by expressing his belief that many issues regarding the legislation would be resolved during the course of this conference.

Mr. David L. Westrate, Assistant Administrator for Operations, DEA, then provided the attendees with a general overview of the DEA's mission and functions. He felt that this conference was a new frontier in the combat against illicit drugs and that it would be a productive and useful venture. He called 1988 the year of the chemical, not only domestically, but internationally as well. He noted that the DEA seeks to motivate and assist foreign governments in the development of regulatory and enforcement programs to reduce the supply of illicit chemicals destined for the United States. As Mr. Billbrough did before him, he stressed the importance of the public getting involved and added that law enforcement agencies cannot solve the drug problem alone even though they have been very successful at what they do. He mentioned that one third of the Federal inmate population is currently incarcerated as a result of convictions for drug offenses and that, during Fiscal Year 1988, cocaine seizures were over 39 percent higher than the previous year and a record number (810) of clandestine laboratories were seized. Mr. Westrate quoted statistics about drug use by teenagers, airline pilots, air controllers and bus drivers and AIDS. He also mentioned violence related to the cocaine trade and gave as an example the

number of individuals gunned down in Colombia.

Mr. Westrate indicated that he is confident that if we work together the drug problem can be curtailed. He commended members of the chemical industry who have participated in the DEA's voluntary precursor program, but he added that this effort has not been comprehensive enough. Therefore, the Chemical Diversion and Trafficking Act has become a necessity, not only to prevent traffickers from acquiring chemicals for illicit purposes, but also to ensure that the legitimate business endeavors of the chemical industry are not hampered.

Mr. Westrate concluded that he is looking forward to an aggressive partnership between the DEA and the chemical industry.

CONFERENCE GOALS AND OBJECTIVES

Mr. Gene R. Haislip, Deputy Assistant Administrator, Office of Diversion Control, DEA, served as the conference chairperson throughout the proceedings. He described how the Act was conceived by the DEA following research of exports of chemicals to Colombia. It became evident that the exportation of the listed chemicals had to be stopped if the manufacture of illicit drugs were to be curtailed. Mr. Haislip commended the industry for its cooperation.

Mr. Haislip reiterated that the DEA and the Federal Government cannot prevent the diversion of chemicals without the assistance of the private sector and international cooperation.

Mr. Haislip then gave a brief history of the Federal effort to combat drug trafficking and illegal drug use as well as an overview of the DEA's enforcement and regulatory functions. He noted that the DEA is the only law enforcement agency operating on a worldwide basis and he cited the numerous international conferences in which the DEA has participated as well as the United States involvement in the drafting of international treaties on drugs.

Mr. Haislip noted that chemicals are necessary for the manufacture of nearly all drugs, licit or illicit, and that many of these chemicals originate in the United States. He discussed the need for the chemical industry to become a partner with the DEA in preventing the diversion of chemicals into the illicit drug market.

AN INTRODUCTION TO THE CHEMICAL DIVERSION AND TRAFFICKING ACT

Mr. Haislip discussed briefly how the DEA classifies controlled substances into five schedules and the criteria used to derive the schedules. He mentioned the success the DEA has had in controlling the diversion and abuse of controlled substances, particularly that of methaqualone.

Mr. Haislip outlined the Act's fundamental provisions and strategies. He emphasized that the controls placed on chemicals would be similar to records which are currently being kept by the industry.

Mr. Haislip then discussed record-keeping requirements and reporting procedures for domestic transactions as well as similar requirements for import-export operations. He noted that, although the majority of handlers of chemicals are legitimate, there are those few who are diverting chemicals into the illicit market.

He noted briefly that the new legislation also places controls on tabletting and encapsulating machines.

Mr. Haislip concluded by saying that with the industry and DEA acting as partners we will be successful in curtailing the diversion of chemicals into the illicit traffic.

AN INTRODUCTION TO THE CHEMICAL INDUSTRY

Mr. Haislip served as the moderator for this phase of the conference in which an overview of the chemical industry was presented. This topic was addressed by a panel consisting of three representatives of national chemical industry associations.

Mr. Randolph Schumacher, Director of Health, Safety and Chemical Regulations, Chemical Manufacturing Association (CMA), addressed the conferees first. After a brief overview of the CMA, he indicated that industry officials were willing to learn, but also had some reservations about the new legislation. He indicated further that they are aware of the Nation's drug problem and of the diversion of chemicals. Consequently, industry officials are committed to work with the DEA.

Mr. Schumacher emphasized the need for the DEA to learn about the chemical industry if the latter is to be regulated effectively.

Mr. Schumacher discussed the scope of the chemical manufacturing industry, its importance to the U.S. economy, and its willingness to cooperate with the DEA. However, he stressed that information gathered by the DEA should be used for a real purpose, not for merely "going through the motions". He expressed concern about the confidentiality of customers and hoped that the DEA would protect this information. He requested that threshold quantities be reasonable to avoid excessive record-keeping and that the criteria for regular customers be simple. He hoped the DEA would be fair when enforcing the new regulations. He pledged that the CMA would educate its members about the new legislation and that the industry would continue to cooperate with the DEA as it had in the past.

Mr. Schumacher was followed by Mr. Andrew Doyle, Executive Director, National Paint and Coating Association (NPCA). Mr. Doyle stressed the need for a cooperative effort between the NPCA and the DEA. He profiled the production process of paints and coatings and the ingredients used in the process.

Mr. Doyle noted that current Environmental Protection Agency (EPA) regulations are considered excessive and they are not always necessary. He was aware that the new legislation will impact greatly on his industry, but he hoped that the DEA's reporting requirements would be limited to something useful.

He expressed concern about the criteria the Attorney General will use to determine a regular customer.

Mr. Doyle concluded that industry officials will do whatever they can to assist the DEA, but he warned that a regulatory overkill could harm the industry he represents.

The next panelist, Mr. John R. Hess, III, President, John R. Hess and Sons, Inc., representing the National Association of Chemical Distributors (NACD), opened his remarks with a brief portrayal of the NACD's functions, its membership and the procedures used by distributors of chemicals for both domestic and overseas transactions. He expressed displeasure about

his industry already being heavily regulated and he added that additional regulations might hamper business. He expressed concern about customer confidentiality and urged the DEA to protect their identities. He hoped that threshold quantities would not impede export operations. Mr. Hess urged that a time frame for compliance with the new regulations should be established to give industry members a chance to familiarize themselves with them. He also urged the DEA to consult with distributors before the regulations are finalized and he hoped that the DEA would be sensitive to the addition of paper work.

THE DRUG PROBLEM IN GENERAL - U.S. FOREIGN OVERVIEW

Mr. Thomas G. Byrne, Deputy Assistant Administrator, Office of Intelligence, DEA, opened his presentation with a brief discussion of the four categories of controlled substances; namely, marijuana, opiates, coca, and dangerous drugs. He followed with an overview of marijuana use in the United States, its sources, and eradication operations conducted in Colombia and Mexico. Mr. Byrne continued with statistical data showing increased use and seizures of cocaine over the past few years in the United States, the sources for coca leaves, the production of cocaine and the U.S. Government's joint programs with South American countries to stem the flow of cocaine. Mr. Byrne then discussed the heroin problem in the United States and the areas of the world where heroin is produced for shipment to the United States. Dangerous drugs such as LSD, PCP and methamphetamine

are manufactured in the United States in clandestine laboratories. Mr. Byrne concluded his presentation with a discussion of crack cocaine; how it is made and used.

CLANDESTINE LABORATORIES IN THE UNITED STATES

This topic was presented by Mr. Raymond J. McKinnon, Chief, Dangerous Drugs Investigations Section, DEA. Mr. McKinnon pointed out that if the United States could stop the influx of cocaine, heroin and marijuana, there still would be a drug problem in America. Except for marijuana, these drugs would be replaced by LSD, PCP and methamphetamine, all of which are manufactured domestically in clandestine laboratories. Mr. McKinnon continued with statistical figures on the magnitude of the problem. He also offered demographic data about the use of these illegal drugs to show that their consumption is not necessarily in the areas in which they are produced. He continued with a description of the typical clandestine laboratory and enumerated the chemicals used in the production of the predominant five drugs manufactured illegally. Mr. McKinnon also discussed the environmental impact of clandestine laboratories and the hazardous waste they generate as well as the methods used by the DEA to detect the laboratories. Mr. McKinnon praised the chemical industry for its voluntary reporting to the DEA of unusual or suspicious orders, but he indicated that there are some firms which will sell indiscriminately.

THE CHEMICAL DIVERSION AND TRAFFICKING ACT - DOMESTIC REQUIREMENTS

Mr. Ronald W. Buzzeo, Deputy Director, Office of Diversion Control, served as the moderator for this panel in which an overview of the domestic requirements of the Act was presented. The panel consisted of Mr. G. Thomas Gitchel, Chief, State and Industry Section, and Ms. Raquel Mann, Special Assistant, from the DEA's Office of Diversion Control.

Mr. Buzzeo opened the panel discussion with the introduction of the panelists and then gave a description of the Act which included the role of DEA field investigators relative to the provisions of the Chemical Diversion and Trafficking Act. He then cited the twelve precursor chemicals and eight essential chemicals listed in the Act and the controlled substances that may be produced from them. He indicated that the Act does not place any of the listed precursor and essential chemicals into the drug schedules of the Controlled Substances Act nor do the record-keeping and reporting requirements apply to any combination of two or more chemicals, provided that at least one of the chemicals is not a listed chemical and the other chemical present is not present solely as an impurity. Mr. Buzzeo further noted that creating a chemical mixture in order to evade record-keeping or reporting requirements of the Act is illegal.

Ms. Mann discussed the effective dates of the provisions of the Act and the relevant sections of Title 21 of the United States Code. She provided an estimate of when the implementing regulations would be finalized and published. Ms. Mann discussed the section of the Act dealing with confidential information could be disclosed. She stressed that it would be safeguarded by DEA Investigators just as they have done with confidential information obtained from the pharmaceutical industry. She also touched briefly on FOI requests.

Mr. Gitchel then discussed the definitions found in Section 6054 of the Act and clarified "regulated person", "distribution", "receipt", "sale", "threshold amount", and "cumulative threshold". He then cited the proposed threshold amounts for each listed chemical, both for domestic transactions and for imports and exports, and explained the five exceptions to the regulated transactions. Mr. Gitchel defined the term "regular customer" as it applies to imports and exports. He discussed the circumstances under which a regular customer or supplier may become qualified or disqualified. He mentioned that all definitions would be added to the Controlled Substances Act.

Mr. Gitchel also discussed record-keeping and reporting procedures and explained the term "readily retrievable".

INTERNATIONAL TRAFFICKING AND DIVERSION OF COCAINE CHEMICALS

Mr. Haislip, who moderated this phase of the conference, gave an overview of the international diversion of chemicals, comparing it to the international diversion of pharmaceuticals. He noted that international treaties led to the curtailment of pharmaceutical diversion and that, at present, there were no such treaties for chemicals. He described how free trade zones are used by traffickers and how international cooperation would be necessary to neutralize the diversion of chemicals.

Mr. Robert Baker, Staff Coordinator, Cocaine Investigations Section, DEA, using visual aids, described the manufacturing process of cocaine, the operation of jungle laboratories, and smuggling routes and methods. He also discussed the DEA's drug enforcement efforts in South America.

Mr. Lawrence M. Gallina, Chief, Diversion Operations Section, DEA, discussed the progress made thus far in preventing chemicals from reaching their ultimate destination. He cited the various sources DEA uses to detect suspicious shipments of chemicals.

Mr. Gallina presented statistical data to show how much cocaine could have been manufactured with chemicals seized by the DEA and other law enforcement organizations. He described the methods used by traffickers to avoid detection such as transshipments and the use of substitute containers.

THE CHEMICAL DIVERSION AND TRAFFICKING ACT - INTERNATIONAL ASPECTS

Mr. Buzzeo moderated this panel which consisted of Mr. Stephen E. Stone, Associate Chief Counsel; Mr. Gallina; Mr. David Walkup, Deputy Chief, Drug Control Section; and Ms. Mann. Mr. Buzzeo, in his opening remarks, emphasized the importance of notification prior to the importing and exporting of chemicals and the need to coordinate our efforts. He went into further detail on declaration, the utilization and need.

Mr. Walkup discussed in general terms the anticipated requirements for imports and exports of chemicals because the regulations have not yet been finalized. He stated that, because of the DEA's experience in monitoring transactions of controlled substances, the requirements for chemicals would be similar to those for controlled substances, although less restrictive. Mr. Walkup then discussed the format of the import/export declarations which will apply to transactions involving chemicals as well. He noted that declarations will be required only for shipments above threshold quantities. He then explained the 15-day notification requirement which will be waived for transactions involving imports from regular suppliers and exports to regular customers.

Ms. Mann defined what constitutes a regular supplier and customer. She also noted that each regulated person must provide the Attorney General with a list of each regular customer or regular supplier with whom the firm

or individual has an established business relationship. Ms. Mann outlined the penalty provisions for violating the new statute and the sections which have been added to the Controlled Substances Act as a result of the new legislation.

Mr. Gallina discussed the factors which may lead to a termination of regular customer status.

Mr. Stone discussed situations which could lead to administrative sanctions and recourses which the industry will have; namely, the right to a hearing and appeal procedures. He noted that a customer or supplier whose "regular customer" status has been terminated also will have the right to a hearing. Mr. Stone explained the Administrator's functions in hearing procedures and the DEA's new subpoena authority under the Act. He discussed forfeiture provisions which have been added to the Controlled Substances Act under the new law.

OPEN FORUM

A question-and-answer session was held which allowed the industry representatives to question the DEA officials on any part of the material that was discussed during the conference.

CLOSING REMARKS

Mr. Haislip concluded the conference by expressing confidence that, with the chemical industry's cooperation, the problem of chemical diversion could be eradicated. Mr. Haislip emphasized that it was not the intent of the DEA to impede legitimate business, but to expose those bogus transactions which facilitate the illicit drug traffic.

Conference participants generally agreed that the conference has been a success in establishing the bases for government and industry cooperation in this important undertaking.

PRESS CONFERENCE

On November 15, 1988, Mr. Haislip, SAC Billbrough, Mr. John Hess, President of NACD, and a panel of DEA and chemical industry representatives held a press conference to explain the provisions and ramifications of the Chemical Diversion and Trafficking Act. In addition to local newspapers and television and radio stations, the following media representatives were present: CNN, NBC, ABC, PBS, FOX, AP, UPI, and Chemical Week.

DEA-CHEMICAL INDUSTRY NATIONAL CONFERENCE

PHILADELPHIA, PENNSYLVANIA
November 14-15, 1988

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