

Safety Services

Procedure for Drugs Precursors

Introduction

1. Following a review in the European Union of the effectiveness of illicit drug precursor control, revised Regulations (EC No 273/2004) have been introduced. Universities have lost their previous exemption to these Regulations which primarily concern trade in chemicals. The regulations and other useful information can be found on the Home Office website at:
<http://www.homeoffice.gov.uk/drugs/licensing/precursors-chemical-licensing/>

Category 1 Substances

2. These include the following (in pure form or mixtures):

1-phenyl-2-propanone (BMK)
N-acetylanthranilic acid
Isosafrol (cis+trans)
3,4-methylenedioxyphenyl-propan-2-one (PMK)
Piperonal
Safrole
Ephedrine
Pseudoephedrine
Norephedrine
Ergometrine
Ergotamine
Lysergic acid
3. Also included are the stereoisomeric forms of the substances listed in this category not being cathine [(+)-norpseudoephedrine], and the salts of the substance listed whenever the existence of such salts is possible, not being the salts of cathine.
4. Note : the definition of substances scheduled under this regulation *excludes* medicinal products for human use (as defined by Directive 2001/83/EC). Thus, the University has not notified the Home Office of stocks of commercially supplied and packaged ephedrine and norephedrine held for resuscitation purposes only. There is also an exemption for "pharmaceutical preparations, mixtures, natural products and other preparations containing scheduled substances that are compounded in such a way that they cannot be easily used or extracted by readily applicable or economically viable means". Many of the terms used here are not separately defined, and interpretation would be subject to case law as and when prosecutions are taken. If anyone believes that substances they hold may be subject to the exemptions, they should provide details to Safety Services.
5. The University has obtained a licence from the Home Office to enable schools to purchase substances in this Category. Contact the Head of Safety Services for further information.

Responsible Officer

6. The Head of Compliance and Risk will act as the Responsible Officer to ensure, so far as is reasonably practicable, use of scheduled substances takes place in compliance with the Regulations.

Declaration of Specific Uses and record keeping

7. Suppliers of Category 1 substances will require customers to complete a *Declaration of Specific Uses Form* (available from the Home Office (HO) <http://www.homeoffice.gov.uk/publications/alcohol-drugs/drugs/drug-licences/customer-dec-1-2-individual> or from suppliers themselves). A single declaration for a 12 month period may be accepted, providing the University has purchased the substance at least three times in the previous 12 months. The licence number required for completing these forms can be obtained from Safety Services (Ext 64003/4). The HO have accepted that for this University "use" may be defined as teaching or research as appropriate.
8. Principal Investigators should keep copies of *Declaration of Specific Uses Forms* for at least 12 months after the final disposal of the consignments to which they relate. A copy must also be sent to Safety Services, Waterloo Place, 180 Oxford Road.
9. Principal Investigators must set up a simple record keeping system which should include:
 - Supplier and date of supply of Category 1 substances;
 - Nature of chemical or preparation;
 - Concentration and amount of substance;
 - Where it will be kept and who by;
 - Date and mode of eventual disposal.

A sample layout is provided for Schools/Principal Investigators use at <http://documents.manchester.ac.uk/display.aspx?DocID=12843>

Secure storage

10. Category 1 substances must be kept securely. The Home Office licence application was made on the basis that the following measures are taken for all stocks of Category 1 substances:
 - Restricted, "need to know" disclosure of detailed location
 - Restricted access to laboratories (e.g. by swipe card or key pad access)
 - Substances stored in locked cabinets or safes within laboratories/secure office (when not in use)
 - Substance use monitored by senior academic staff
11. These measures should also apply, so far as is practicable, to solutions/preparations prepared from the original consignment that could be used

for illicit drug manufacture. Any departure from these measures should be discussed with the Head of Safety Services as further discussions and notifications to the Home Office may be necessary.

12. Heads of Schools / Principal Investigators should ensure that only authorised persons have access to Category 1 substances.
13. Schools must inform the Head of Safety Services (Ext 64004) or their University Safety Co-ordinator, immediately of theft or unexplained loss of a Category 1 substance.
14. Schools must also inform the Responsible Officer if they wish to supply Category 1 substances to parties outside the University. This will almost certainly constitute "trade" and additional Regulations could apply.
15. The Compliance & Risk Office will contact relevant schools at appropriate intervals throughout the year to monitor the keeping and use of Category 1 substances and will report annually to the Responsible Officer through the University Health & Safety Committee, and to the Home Office.

Category 2 substances

16. These include :

Acetic anhydride
Phenylacetic acid
Anthranilic acid
Piperidine
Potassium permanganate.

17. A licence will not be required to enable departments to be supplied with these substances but suppliers will require customers to complete a *Declaration of Specific Uses Form* (see above). These declarations will not require a licence number
18. Schools should record the acquisition of Category 2 substances.
19. Category 2 substances should, so far as is reasonably practicable, be kept securely.
20. Schools must inform the Head of Safety Services if they wish to supply Category 2 substances to parties outside the University. This could constitute "trade" and additional parts of the Regulations (including the need to obtain a HO licence) might apply.

Category 3 substances

21. These include

Hydrochloric acid

Sulphuric acid
 Toluene
 Ethyl ether
 Acetone
 Methyleneethylketone (MEK)

22. The Regulations relating to Category 3 substances are not likely to be relevant to the University as they concern the export of substances to countries outside the EU.

23. There are no restrictions on the keeping & use of Category 3 substances other than normal health & safety considerations.

Responsibilities

24. The Head of School/Directorate is responsible for ensuring arrangements are in place to comply with these regulations. All purchasers and users of drug precursors must comply with this Procedure.

Document control box	
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Supersedes:	Procedure for Drugs Precursors v1.0 (Sept 2007)
Previous review dates:	University Code of Practice and Guidance on Drugs Precursors March 2005
Next review date:	Upon any significant change
Equality impact outcome	Initial screening will take place during the consultation process.
Related documents:	
Related Statutes, Ordinances, General Regulations	EU Regulation No 273/2004 University of Manchester Statute XII(g) University of Manchester Statute XIII, Part III to do with disciplinary procedures for members of staff General Regulations, Regulation XVII, 3(f) and 5(a) to do with misconduct of students
Related Policies:	Health & Safety Policy
Related Procedures:	A-Z of documents on specific health & safety topics, at http://www.campus.manchester.ac.uk/healthandsafety/CoPs&Guidance.htm
Related Guidance:	
Related information:	Example layout to record of purchase and use
Policy owner:	Head of Safety Services (currently Dr M J Taylor)
Lead contact:	Head of Safety Services (currently Dr M J Taylor)