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SCIENTIFIC SUB-COMMITTEE

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DRAFT AMENDMENTS TO THE EXPLANATORY NOTES CONCERNING NARCOTIC DRUGS,
PSYCHOTROPIC SUBSTANCES AND THEIR PRECURSORS

(Item II.8 on Agenda)

Reference documents :

39.240 (HSC/15)
39.400, Annex F/4 (HSC/15 - Report)
39.445 (SSC/9)
39.480, Annex A/12 (SSC/9 - Report)
39.542 (HSC/16)
39.600, Annex F/2 (HSC/16 - Report)
39.900 (SSC/10)
40.080, Annex A/6 (SSC/10 - Report)
40.041 (HSC/17)
40.194 (HSC/17)
40.284 (HSC/17)
40.260, Annex F/2 (HSC/17 - Report)
40.622 (HSC/18)
40.600, Annex H/30 (HSC/18 - Report)
40.912 (HSC/19)
41.182 (HSC/19)
41.100, Annex G/21 (HSC/19 - Report)

I. BACKGROUND

1. At its 19th Session, the Harmonized System Committee continued its examination of proposed Explanatory Note amendments concerning narcotic drugs, psychotropic substances and their precursors. In view of the technical nature of the issues under examination, the Committee decided to send all of the questions in Doc. 40.912, along with the EC comments in Doc. 41.182, to the Scientific Sub-Committee for advice. The Committee agreed to ask the Secretariat to prepare a new document for consideration by the Sub-Committee, taking into account the comments to be submitted by administrations.

File No. 2529/VI-4

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II. SECRETARIAT COMMENTS

2. As mentioned in paragraph 1 above, there are several issues for the Sub-Committee to address. For ease of reference, the Secretariat summarized the questions referred to the Sub-Committee as follows :

(a) CAS Registry Nos.

3. The Secretariat has since received new CAS Registry Nos. from Japanese Administration for following 36 Chemicals and these have been incorporated in the Annex to this document :

Acetorphine hydrochloride	25333-78-2	Hydrocodone hydrochloride	25968-91-6
Acetyldihydrocodeine	3861-72-1	Hydrocodone phosphate	34366-67-1
6-Acetylmorphine	2784-73-8	Norcodeine hydrochloride	14648-14-7
Anileridine phosphate	4268-37-5	Normethadone hydrochloride	847-84-7
<i>d</i> -Cocaine	478-73-9	Thebacon hydrochloride	20236-82-2
Codeine methylbromide	125-27-9	Trimeperidine hydrochloride	125-80-4
Dextromoramide hydrogen tartrate (bitartrate)	2922-44-3	Buprenorphine hydrochloride	53152-21-9
Diethylthiambutene hydrochloride	132-19-4	Butobarbital	77-28-1
Difenoxin hydrochloride	35607-36-4	Cathine hydrochloride	2153-98-2
Dihydrocodeine hydrogen tartrate (bitartrate)	5965-13-9	Clorazepate dipotassium	57109-90-7
Dihydrocodeine phosphate	24204-13-5	Clorazepate monopotassium	5991-71-9
Dihydromorphine	509-60-4	DET	61-51-8
Dihydromorphine hydrochloride	1421-28-9	Dexamfetamine phosphate	7528-00-9
Dimenoxadol hydrochloride	2424-75-1	DMT	61-50-7
Etorphine hydrochloride	13764-49-3	Fenproporex hydrochloride	18305-29-8
Heroin hydrochloride	1502-95-0	Mescaline	54-04-6
		Pentazocine lactate	17146-95-1
		Pentobarbital calcium	7563-42-0
		STP, DOM	15588-95-1
		<i>d</i> -9-Tetrahydrocannabinol	1972-08-3

4. In the draft Explanatory Note amendments, however, a large number of CAS Registry Nos. are still missing (approximately 350 chemicals). In this connection, the EC considered that it was indispensable to insert the missing CAS Registry Nos., since they identified the chemicals products in a unique way (see paragraph 2 to Doc.41.182).

5. The Secretariat's effort to get complete information on CAS Nos. have not been successful yet. Contacts established with the CAS Client Service indicated that it would be extremely expensive to get the required information (US\$25 x 350 = US\$8,750). The Secretariat's effort to obtain CAS Nos. from the UNDCP was also in vain. The Secretariat is therefore not in a position to complete the list unless a Member Administration does so on its behalf. The Sub-Committee is, therefore, asked to give its views whether it is indispensable to insert missing CAS Nos. for proper identification of chemicals concerned. In this regard, it should be noted that the present list in the Explanatory Note does not give the CAS Nos. One option is to give only the available CAS Nos. An alternative is to give no CAS Nos. for any of those chemicals.

(b) Classification of resinate derivatives

6. The classifications of resinate derivatives were placed in square brackets for the following chemicals :

Narcotics drugs :

codeine resinate	[2939.10] [3003]
dextropropoxyphene resinate	[3806.20] [3003]
hydrocodeine resinate	[2939.10] [3003]
hydrocodone resinate	[2939.10] [3003]

Psychotropic substances :

amfepramone resinate	[3806.20] [3003]
amfetamine resinate	[3806.20] [3003]
amobarbital resinate	[3806.20] [3003]
cathin resinate	[2939.49] [3003]
dexamfetamine resinate	[3806.20] [3003]
fenproporex resinate	[3806.20] [3003]
methaqualone resinate	[3806.20] [3003]
phentermine resinate	[3806.20] [3003]
secobarbital resinate	[2939.49] [3003]

In this connection, the Secretariat recalls that the Sub-Committee (10th Session) had concluded that resinate derivatives which had been tentatively classified in heading 38.06 were, in fact, timed-release preparations consisting of an active pharmaceutical compound on a polymeric substrate and that these resinate products should be classified in appropriate subheadings of heading 30.03 (See SSC/10 Report, Doc. 40.080, Annex A/6).

(c) Modification of chemical names

7. Aside from typographical errors, the EC had proposed certain chemical name modifications, as follows (unless otherwise indicated, changes are given for both French and English) :

Narcotic drugs :

- Codéine-N-oxide => N-Oxyde de codéine (French only)
- Napsylate de dextropropoxyphene/Dextropropoxyphene napsylate => "napsilate"
- Citrate de fentanyl/Fentanyl citrate => Dihydrogenocitrate de fentanyl/Fentanyl dihydrogen citrate
- Levo-A-acétylméthadol/Levo-A-acetylmethadol => Lévacétylméthadol/Levacetylmethadol
- Morphine-N-oxide => N-Oxyde de morphine (French only)
- Ethylsulfonate de piminodine/Piminodine ethylsulfonate => Esilate de piminodine/Piminodine esilate

Precursors :

- Maléate d'ergométrine/Ergometrine maleate => Hydrogénomaléate d'ergométrine/Ergometrine hydrogen maleate
- Diéthyl éther => Oxyde de diéthyle (diéthyléther) (French only)
- Ethyl ether => Diethyl ether (English only)
- Hydrochloric acid => Hydrogen chloride (hydrochloric acid) (English only)
- Méthyl éthyl cétone/Methyl ethyl ketone => Butanone (éthylméthylcétone)/Butanone (ethyl methyl ketone)
- 1-Phénylpropane-2-one/1-Phenyl-2-propanone => Phénylacétone (benzylméthylcétone, phénylpropane-2-one)/Phenylacetone (benzyl methyl ketone, phenylpropan-2-one)
- Toluène/Toluene => Toluène, pur/Toluene, pure

Although the Secretariat has no objection, in general, to the proposed chemical-name modifications above, it has the following specific comments :

- In the case of the narcotic drug, citrate de fentanyl/fentanyl citrate, the Secretariat would point out that the reference to "fentanyl citrate" appears as such in the USAN, JAN and Merck Index.
- Similarly, these sources refer to ergometrine maleate, and not to ergometrine hydrogen maleate.
- Regarding the narcotic drug, ethylsulfonate de piminodine/piminodine ethylsulfonate, the proposal to change the term "ethylsulfonate" by the term "esilate" seems to be acceptable. Merck indicates that "esylate" is the USAN designation for the radical, ethanesulfonate, and "esilate" seems to be the spelling used for the purposes of the INN list.
- Regarding toluene, the Secretariat wonders whether it is necessary to indicate that the product is pure.

(d) Change of classifications

8. At the suggestion of the EC during the Harmonized System Committee's 18th Session, the Secretariat has revised the classification of piperidine platinichloride from subheading 2933.32 to 2843.90 as Note 1 (b) to Section VI gives precedence, *inter alia*, to heading 28.43 for organic chemicals of precious metals. Consequently, the narcotic drug, norcodeine platinichloride, and the psychotropic substance, mescaline platinichloride, have also been designated as being classified in subheading 2843.90.

(e) Cathine

9. At the Harmonized System Committee's 18th Session, the US Delegate mentioned that it would be useful to consider the appropriateness of classifying certain other cathine derivatives with ephedrines. In this connection, the EC noted that cathine could be considered as a derivative of pseudoephedrine, just as norephedrine was considered a derivative of ephedrine (see Explanatory Note to heading 29.39, page 441, Part (D)). Therefore, classification of cathine in subheading 2939.49 would seem to be correct. The

Secretariat would add that (i) cathine (better known as norpseudoephedrine) differs structurally from ephedrine (2-methylamino-1-phenylpropanol) in that it does not have the methyl group attached to the amino group, and (ii) ephedrine and pseudoephedrine are stereoisomers, and norephedrine and cathine are stereoisomers.

III. CONCLUSIONS

10. The Sub-Committee is asked to give its views on the following points :
- (a) whether the available CAS Nos. be included against chemicals concerned or they should be deleted (see paragraph 5 above);
 - (b) the classification of resinate derivatives, including cathine resinate (see paragraph 6 above);
 - (c) the modification of chemical names (see paragraph 7 above);
 - (d) the classification of certain precursors containing precious metal elements (see paragraph 8 above); and
 - (e) whether cathine can be regarded as a derivative of ephedrine (see paragraph 9 above);
11. Based on its conclusion on the above points, the Sub-Committee is also invited to examine the draft amendment to the Explanatory Notes set out in the Annex.

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