

# NOTICE



## CHEMICAL PRODUCTS USED IN ILLICIT FENTANYL MANUFACTURING

The Drug Enforcement Administration (DEA) is issuing this notice to inform handlers of chemical products that some chemicals may be used in the illicit manufacture of fentanyl. The DEA recognizes that you or your company may be handling List I and List II chemicals used in the manufacturing of fentanyl in your regular course of business. Such distribution, receipt, sale, importation, or exportation of listed chemicals can qualify as a regulated transaction per the Controlled Substances Act (CSA) and its corresponding federal regulations. 21 U.S.C. 802(39); 21 CFR 1300.02.

### Illicit Fentanyl abuse is a major drug problem in the United States.

Drug traffickers outside the United States exploit import laws to ship packages containing List I and List II chemicals, drugs, and counterfeit goods into the United States.

DEA reporting indicates that de minimis-exempt packaging has been used to evade detection and scrutiny by customs. Imported goods seized in de minimis packages range from illicit drugs to List I and II chemicals, which in some instances were manifested as cheap consumer products or non-controlled chemicals.

The following listed chemicals may be used in the illicit manufacture of fentanyl. This is by no means an exhaustive list of the List I and List II chemicals that may be involved in regulated transactions. Please consult Title 21 Code of Federal Regulations for more information. [21 CFR 1308.11–1308.15](#); [1310.02](#).

**List I**    **1-Boc-4-AP**  
**4-anilinopiperidine**  
**4-piperidone**  
**benzylfentanyl**  
**N-phenethyl-4-piperidone**  
**propionic anhydride**

**List II**    **ethyl ether**  
**hydrochloric acid**  
**hydrochloric gas**  
**toluene**

### Each handler (regulated person) shall report to the DEA:

- 1) any regulated transaction with a person previously identified by the DEA
- 2) any regulated transaction involving an extraordinary quantity of a listed chemical
- 3) any regulated transaction involving an uncommon method of payment or delivery
- 4) any unusual or excessive loss or disappearance of a listed chemical under the control of the regulated person, or
- 5) any regulated transaction involving any other circumstance that the regulated person believes may indicate that the listed chemical will be used in violation of the CSA.

It is unlawful for any person knowingly or intentionally to possess or distribute chemicals used in the illicit manufacture of fentanyl, or having reasonable cause to believe the chemicals will be used to illegally manufacture fentanyl. 21 U.S.C. 843(a)(6), (7). Failure to comply may result in criminal, civil, or administrative proceedings.

**The Drug Enforcement Administration thanks you for your cooperation in this matter.**

For more information, please visit: [DEAdiversion.usdoj.gov](https://deadiversion.usdoj.gov)

To report suspicious chemical related activity, please visit: [apps.deadiversion.usdoj.gov/CORT](https://apps.deadiversion.usdoj.gov/CORT)

For additional questions: [DOC@dea.gov](mailto:DOC@dea.gov)