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United States Senate
SENATE CAUCUS ON
INTERNATIONAL NARCOTICS CONTROL
HART SENATE OFFICE BUILDING, ROOM 818–C
WASHINGTON, DC 20510

April 20, 2022

Jagjit Pavadia
President
International Narcotics Control Board
Vienna International Centre
Room E-1339
P.O. Box 500
A-1400 Vienna
Austria

Dear Ms. Pavadia:

We commend the International Narcotics Control Board (INCB) for its recommendation resulting in the 65th session of the United Nations Commission on Narcotic Drugs (CND) voting unanimously to control three fentanyl precursor chemicals: 4-anilinopiperidine (4-AP), 1-(tert-butoxycarbonyl)-4-(phenylaminopiperidine) (boc-4-Ap), and N-phenyl-N-(piperidin-4yl) propionamide (norfentanyl). In its November 9, 2020 letter to INCB, Senators John Cornyn and Dianne Feinstein, then co-chairs of the United States Senate Caucus on International Narcotics Control, urged INCB to make this recommendation along with controlling the methamphetamine precursor, methylamine, which was left out. We encourage INCB to build on its recent success by recommending that methylamine be scheduled under the *1988 United Nations Convention Against Illicit Traffic in Narcotics and Psychotropic Substances* (henceforth the *1988 UN Convention*).

As INCB noted in its 2021 precursor report, "methylamine is a versatile chemical that is required in the illicit manufacture of a number of amphetamine-type stimulants (e.g., methamphetamine and MDMA)."[1] This precursor chemical is used with phenyl-2-propanone (P2P) in the reductive amination method that Mexican transnational criminal organizations (TCOs) use to manufacture highly pure and potent methamphetamine.[2] In fact, the United States Drug Enforcement Administration (DEA) reports that 99.2 percent of its seized methamphetamine samples were produced using this method in the first half of 2019.[3] Mexican TCOs import most of their precursor chemicals from China, which the United States Department

[1] International Narcotics Control Board, *Precursors and Chemicals Frequently Used in the Illicit Manufacture of Narcotic Drugs and Psychotropic Substances, 2021*. Report No. E.22.XI.7. Austria: United Nations, 2021. Electronic. https://www.incb.org/documents/PRECURSORS/TECHNICAL_REPORTS/2021/E/Ebook_E.pdf (Accessed March 18, 2022).
[2] Drug Enforcement Administration, *2020 National Drug Threat Assessment.* Report No. DEA-DCT-DIR-008-21. Washington, D.C: U.S. Department of Justice, 2021. Electronic, https://www.dea.gov/sites/default/files/2021-02/DIR-008-21%202020%20National%20Drug%20Threat%20Assessment_WEB.pdf (Accessed March 18, 2022).
[3] ibid.

of State has designated a "major precursor chemical source country."[4] Unlike the United States, neither Mexico nor China has controlled methylamine.

Methamphetamine has produced devastating impacts throughout the world, including in the United States. The United Nations Office on Drugs and Crimes (UNODC) reports that globally 27 million individuals used amphetamines such as methamphetamine in 2019.[5] Furthermore, law enforcement authorities collectively seized about 325 tons of methamphetamine in 2019, a 43 percent increase over 2018.[6] UNODC also reported that methamphetamine is the most commonly used amphetamine in North America, East Asia, Southeast Asia, and Australia.[7]

In 2020, 24,576 Americans died from an overdose involving psychostimulants, a class of drugs that includes methamphetamine.[8] In our home states of Rhode Island and Iowa, psychostimulant deaths, driven by methamphetamine use, jumped by approximately 200 percent and 109 percent, respectively, between 2016 and 2020.[9] Mexican TCOs are responsible for the majority of methamphetamine manufactured and trafficked into our states.[10]

As the United States Senate Caucus on International Narcotics Control has expressed to INCB in the past, international action is necessary to stop methylamine sales that enable criminal groups to produce methamphetamine. Recommending that CND schedule methylamine under the *1988 UN Convention* will help save lives across the globe, including in the United States.

We respectfully request that you meet with our staff to discuss the process that INCB uses to schedule precursor chemicals and how the United States can better support INCB's efforts to curb the international supply of methamphetamine and other narcotics.

Sincerely,

Sheldon Whitehouse
Chairman

Charles E. Grassley
Co-Chairman

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[4] Bureau of International Narcotics and Law Enforcement Affairs, International Narcotics Control Strategy Report. Washington, D.C.: U.S. Department of State, 2021. Electronic, https://www.state.gov/wp-content/uploads/2021/02/International-Narcotics-Control-Strategy-Report-Volume-I-FINAL-1.pdf (Accessed March 18, 2022).

[5] United Nations Office on Drugs and Crime, Drug Market Trends for Cocaine, Amphetamine-type Stimulants Amphetamine. World Drug Report 2021/Report No.E.21.XI.8, Austria: United Nations, 2021. Electronic, https://www.unodc.org/res/wdr2021/field/WDR21_Booklet_4.pdf (Accessed March 18, 2022).

[6] ibid.

[7] ibid.

[8] National Center for Health Statistics. "12 Month-ending Provisional Number of Drug Overdose Deaths," Atlanta: Centers for Disease Control and Prevention, February 2, 2022, https://www.cdc.gov/nchs/nvss/vsrr/drug-overdose-data.htm (Accessed March 18, 2022).

[9] ibid.