# Amphetamine precursors: MAPA, APAAN, APAA, P2P methyl glycidic acid, P2P methyl glycidate

## Report to the Expert Advisory Committee on Drugs

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# Contents

# 1 EXECUTIVE SUMMARY

The 5 amphetamine precursors MAPA, APAAN, APAA, P2P methyl glycidate and P2P methyl glycidic acid are not currently controlled under the Misuse of Drugs Act 1975, the Psychoactive Substances Act 2013 or the Medicines Act 1981. Therefore, illicit use of these substances is currently uncontrolled in New Zealand.

These substances have been recommended for scheduling by the Institute of Environmental Science and Research (ESR) after their emergence at international borders following control of other amphetamine precursor substances being implemented in different jurisdictions.

Many overseas jurisdictions have adopted control measures for substances such as MAPA, APAAN and APAA. MAPA, APAAN and APAA have also been scheduled under the United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances of 1988. Due to these substances being scheduled under this convention, New Zealand is obliged to review the classification of these substances under its own domestic legislation.

These substances are pre-precursors for methamphetamine. They have presented on the illicit amphetamine manufacturing market but have no recognised therapeutic use or value. They have likely increased in prevalence internationally in a bid to try and circumvent the legislative controls on other similar amphetamine precursors.

The risk of harm presented from these substances is due to their ease of convertibility into P2P - a methamphetamine precursor. Therefore, any risks associated with these substances can be related to the risk associated with methamphetamine.

In New Zealand, methamphetamine use and abuse most commonly impacts the most vulnerable and marginalised populations within our communities. Long term use and abuse of methamphetamine can cause harm to those who use it, as well as their whānau and wider community. Methamphetamine has been detected in every community in New Zealand.

These substances are all amphetamine precursors. However, for the purposes of this document in the New Zealand context, these substances have been referred to as methamphetamine pre-precursors.

# 2 INTRODUCTION

## 2.1 Purpose

This report provides an overview of 5 amphetamine precursors that are being presented to the Expert Advisory Committee on Drugs (the Committee) for their consideration and scheduling recommendations under the Misuse of Drugs Act 1975.

The amphetamine precursors to be considered by the Committee are:

- methyl *alpha*-phenylacetoacetate (MAPA)
- *alpha*-phenylacetoacetonitrile (APAAN)
- *alpha*-phenylacetoamide (APAA)
- P2P methyl glycidic acid
- P2P methyl glycidate.

## 2.2 Substance classification

MAPA, APAAN, APAA, P2P methyl glycidic acid and P2P methyl glycidate are all used in manufacturing illicit amphetamine substances. This includes the manufacture of methamphetamine which is a common drug of illicit use and abuse within New Zealand.

These 5 precursor substances are currently not controlled under the Misuse of Drugs Act 1975, the Psychoactive Substances Act 2013 or the Medicines Act 1981. As a consequence, this limits the powers of the New Zealand Police (Police) and New Zealand Customs Service (Customs) under the Search and Surveillance Act 2012 for these amphetamine precursor substances. These precursor substances are considered to have no therapeutic use or value.

It has been noted in Europe and North America that the methamphetamine synthesis routes which use these amphetamine precursors are the most common routes for illicit manufacture of amphetamine and methamphetamine (UNODC 2019). Detections and seizures of these amphetamine precursors have occurred in different parts of Europe including the Netherlands and Belgium. These precursor substances have also been noted as being present in large quantities in countries such as China and Mexico. The use and abuse of these precursor substances to manufacture amphetamine and methamphetamine has presented itself globally (INCB 2021).

In New Zealand there is little supporting evidence of these precursor substances being used to manufacture methamphetamine in clandestine laboratories (NDIB 2022).

## 2.3 Why is this substance being considered?

Under Table I of the United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances of 1988 (1988 Convention), 3 of these precursors (MAPA, APAAN and APAA) have been scheduled internationally. To meet our international obligations these 3 precursor substances must be considered for scheduling under domestic legislation. Due to their presence and risk of harm within New Zealand 2 additional precursors (P2P methyl glycidic acid, P2P methyl glycidate) have been recommended for scheduling under the Misuse of Drugs Act 1975 by the Institute of Environmental Science and Research (ESR).

ESR have recommended all of these methamphetamine pre-precursors for scheduling following an increased incidence of these substances being seized at international borders, suggesting a potential change to the amphetamine manufacturing market (ESR, personal communications, August 2022).

# 3 SUBSTANCE IDENTIFICATION AND CHEMISTRY

## 3.1 Identification

### *MAPA*

IUPAC Name: methyl 3-oxo-2-phenylbutanoate

CAS Number: 16648-44-5

Molecular weight: 192.2g/mol

Molecular formula: $C_{11}H_{12}O_3$

Appearance: a crystalline solid (Cayman Chemical 2022c)

Solubility: soluble in dimethyl sulfoxide and ethanol, partly soluble in methanol (Cayman Chemical 2022c).

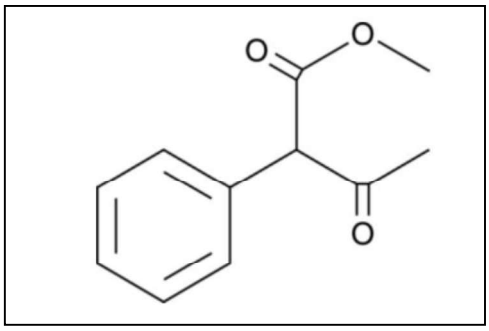



**Figure 1: Chemical structure of MAPA**

### *APAAN*

IUPAC Name: 3-oxo-2-phenylbutanenitrile

CAS Number: 4468-48-8

Molecular weight: 159.2g/mol

Molecular formula: $C_{10}H_9NO$

Appearance: a crystalline solid (Cayman Chemical 2022b).

Solubility: soluble in dimethyl sulfoxide and ethanol (Cayman Chemical 2022b).

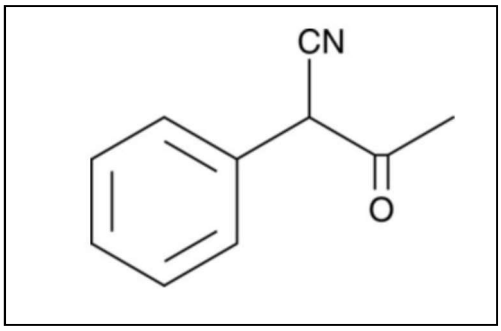



**Figure 2: Chemical structure of APAAN**

*APAA*

IUPAC Name: 2-phenylacetamide

CAS Number: 103-81-1

Molecular weight: 135.2g/mol

Molecular formula: $C_8H_9NO$

Appearance: a crystalline solid (Cayman Chemical 2022a)

Solubility: soluble in dimethyl sulfoxide and ethanol (Cayman Chemical 2022a).

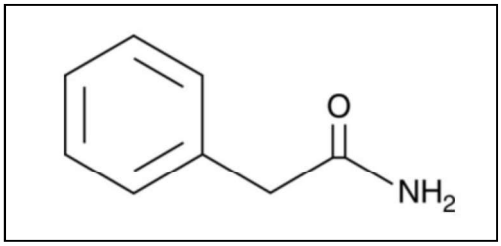



**Figure 3: Chemical structure of APAA**

*P2P methyl glycidic acid*

IUPAC Name: 2-methyl-3-phenyloxirane-2-carboxylic acid

CAS Number: 25547-51-7

Molecular weight: 178.2g/mol

Molecular formula: $C_{10}H_{10}O_3$

Appearance: a crystalline solid (Cayman Chemical 2022e)

Solubility: soluble in dimethyl sulfoxide and ethanol (Cayman Chemical 2022e).

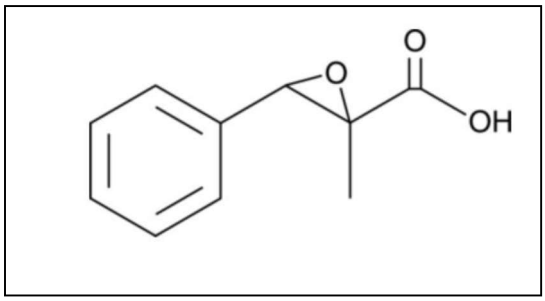



**Figure 4: Chemical structure of P2P methyl glycidic acid**

*P2P methyl glycidate*

IUPAC Name: 2-methyl-3-phenyl-2-oxiranecarboxylic acid, methyl ester

CAS Number: 80532-66-7

Molecular weight: 192.2g/mol

Molecular formula: $C_{11}H_{12}O_3$

Appearance: a crystalline solid (Cayman Chemical 2022d)

Solubility: soluble in dimethyl sulfoxide and ethanol (Cayman Chemical 2022d).

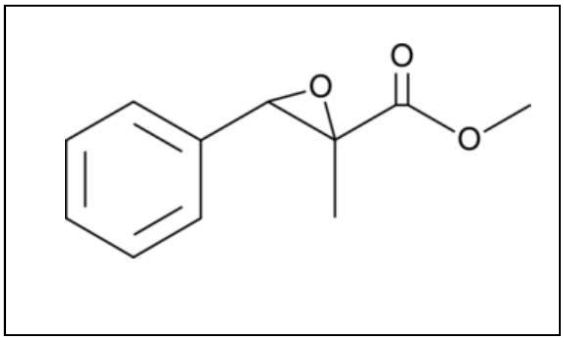



**Figure 5: Chemical structure of P2P methyl glycidate**

## 3.2 Therapeutic value

All 5 precursor substances have no recognised or legitimate therapeutic use or value (Evidence Based Policing Centre 2021).

## 3.3 Similarities to other known substances

The 5 amphetamine precursors under consideration are 1-phenyl-2-propanone (P2P) precursors. P2P is scheduled under Part 1 of Schedule 4 of the Misuse of Drugs Act 1975 and is a methamphetamine precursor that is readily convertible into both amphetamine and methamphetamine (Tsujikawa et al 2021).

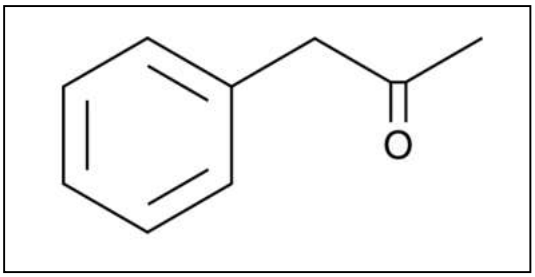



**Figure 6: Chemical structure of P2P**

The 5 amphetamine precursors under consideration are P2P precursors which are produced to divert any legislative controls that exist for P2P (or similar substances) (UNODC 2019). The sole use for these precursors is their conversion into P2P for the manufacture of amphetamine and methamphetamine.

The risk of harm of these 5 precursor substances is from their ease of conversion into P2P and subsequently methamphetamine. They have a similar risk of harm to that of P2P.

*Structural similarities*

- MAPA – Both MAPA and P2P have a benzene ring with a propyl group attached. They both have a ketone group on the second carbon of the chain. As well as the entire structure of P2P, MAPA also has a methyl-ester side chain substituted at the first carbon.

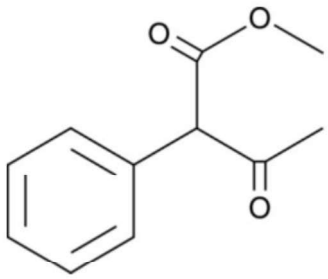
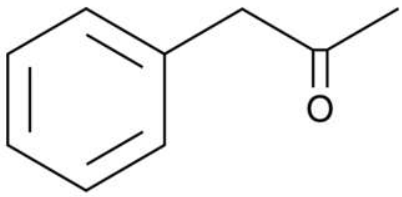
| MAPA | P2P |
|---|---|
|  |  |



**Figure 7: Chemical structure of MAPA compared to P2P**

- APAAN – Both APAAN and P2P have a benzene ring with a propyl group attached. They both have a ketone group on the second carbon of the chain. As well as the entire structure of P2P, APAAN also has a nitrile group substituted at the first carbon.

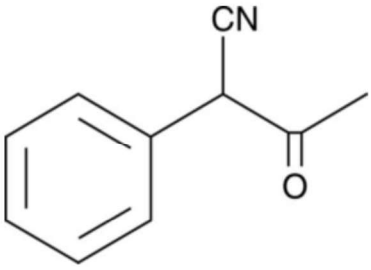
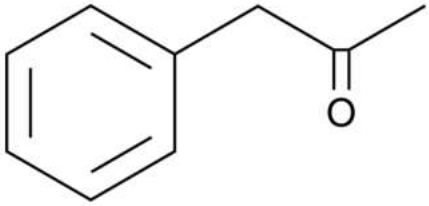
| APAAN | P2P |
|---|---|
|  |  |



**Figure 8: Chemical structure of APAAN compared to P2P**

- APAA – Both APAA and P2P have a benzene ring with a 3-atom chain attached. They both have a ketone group on the second carbon of the 3-atom chain. However, APAA has an amide as the third atom in the chain whilst P2P has a methyl group.

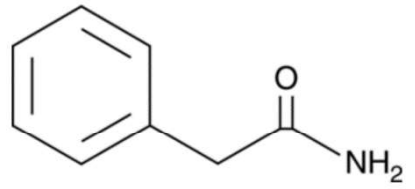
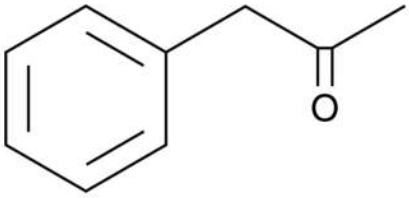
| APAA | P2P |
|---|---|
|  |  |

**Figure 9: Chemical structure of APAA compared to P2P**

- P2P methyl glycidic acid – Both P2P methyl glycidic acid and P2P have a benzene ring in their structures. However, P2P methyl glycidic acid has an oxirane methyl ester substituent at the first carbon. There is an additional methyl substituent at the second carbon of P2P methyl glycidic acid, compared to P2P which has a carbonyl group at this position.

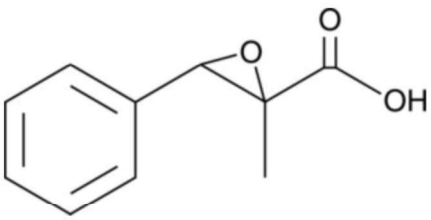
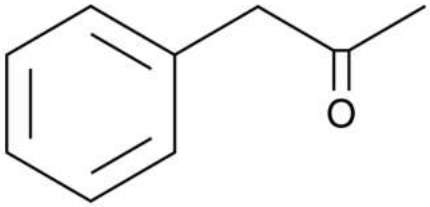
| P2P methyl glycidic acid | P2P |
|---|---|
|  |  |

**Figure 10: Chemical structure of P2P methyl glycidic acid compared to P2P**

- P2P methyl glycidate – Both P2P methyl glycidate and P2P have a benzene ring. However, P2P methyl glycidate has an oxirane carboxylic acid substituent at the first carbon. There is an additional methyl substituent at the second carbon of P2P methyl glycidate compared to P2P which has a carbonyl group at this position.

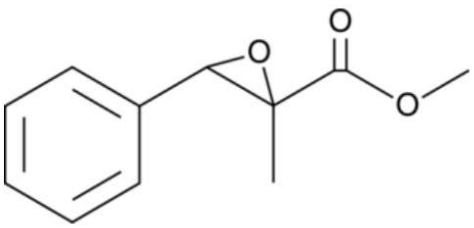
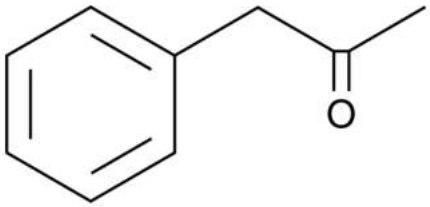
| P2P methyl glycidate | P2P |
|---|---|
|  |  |

**Figure 11: Chemical structure of P2P methyl glycidate compared to P2P**

## 3.4 Methods and ease of manufacturing

As drug manufacturing operations have diversified, and increased in sophistication and scale, the world has seen a proliferation in the use of non-scheduled precursor chemicals. Alongside the increase in scale, the presence of clandestine synthetic drug manufacturing facilities is now seen in every region of the world.

Many amphetamine precursors that appear in the market have been deliberately designed and manufactured to circumvent existing legislation and/or avoid detection and identification (UNODC 2019). A good example of this has been seen in Europe, where since 2011, existing methamphetamine pre-precursors have been rapidly replaced with new precursors (EMCDDA 2022).

- MAPA can be formed by reacting acetophenone with methyl diazoacetate in the presence of a Brønsted acid catalyst. This is analogous to the reaction described between an aryl methyl ketone and an ethyl diazoacetate in the presence of a Brønsted acid catalyst which forms a 3-oxo-ester (Rahaman et al 2021).
- APAAN can be formed from a reaction between benzyl cyanide and anhydrous ethyl acetate with a solution of sodium ethoxide to form anhydrous APAAN (Rhodium 2022).
- APAA can be formed from a reaction between benzyl chloride, sodium hydroxide and carbon monoxide to form sodium phenylacetate, which can then further be processed to produce phenylacetic acid (Google Patents 2018).
- P2P methyl glycidic acid can be formed from the reaction of the relevant α-chloro-β-hydroxy ester with sodium hydroxide in ethanol to form the epoxy glycidic acid compound (Dullaghan and Nord 1953).
- P2P methyl glycidate can be formed by further treatment of P2P methyl glycidic acid with alcoholic sodium or potassium to form the alkali salt of P2P methyl glycidate (Dullaghan and Nord 1953).

### *Involvement of amphetamine precursors in the methamphetamine manufacture process*

MAPA, APAAN and APAA are chemical intermediates. When isolated they can be converted to P2P, and further converted through a catalytic reduction reaction to form methamphetamine (EMCDDA 2022; UNODC 2019).

P2P methyl glycidate and P2P glycidic acid are designer methamphetamine pre-precursors which can also be converted to P2P (UNODC 2019). These methamphetamine pre-precursors are used to circumvent the controls on P2P in New Zealand and overseas.

P2P is an oil which can be imported, or made from designer precursor or pre-precursor chemicals. This method of manufacture is easier to scale up than the route of manufacturing methamphetamine using ephedrine and pseudoephedrine making it more suitable for use in industrial scale clandestine manufacturing (EMCDDA 2022). Through reductive amination or the Leuckart route, P2P forms a racemic mixture of methamphetamine (EMCDDA 2013). As *l*-methamphetamine isomer is less potent than the *d-methamphetamine* isomer, an additional separation and purification step is needed to obtain the more potent *d*-methamphetamine isomer (EMCDDA 2022).

# 4 RISK OF HARM

## 4.1 Likelihood or evidence of abuse in New Zealand

*Methamphetamine pre-precursors - New Zealand seizure data*

There is little evidence of use and abuse of these substances within New Zealand.

With respect of importation of precursors, 2 individual consignments of MAPA were seized by Customs (1 in September 2020 and 1 in March 2021), totalling 27.9kg, that had originated from China. It was estimated that this could produce 12 to 18kg of methamphetamine. In March 2014, Customs also seized 500g of APAAN that had originated from China. It is estimated that this could produce around 200g of methamphetamine. There are no other recorded seizures of the other amphetamine precursors.

With respect of manufacturing within New Zealand, a report from NDIB has also noted that since 2020, there has been limited information that methamphetamine is being manufactured in New Zealand via the P2P method. The report also outlined that most clandestine laboratories, detected and assessed as manufacturing methamphetamine in New Zealand use ephedrine as the main precursor. There is little evidence that any other method that does not use ephedrine is being routinely used (NDIB 2022).

*Methamphetamine*

Based on the 2019/2020 New Zealand Health Survey, methamphetamine was one of the most used amphetamines in New Zealand. Within the previous 12 months of the report being published, 1.1% of the population used methamphetamine recreationally. This is equivalent to 45,000 adults (Parliamentary Service 2021). Within New Zealand, the rate of use and abuse of amphetamine substances, including methamphetamine, is disproportionately higher in vulnerable and marginalised populations, including Māori and low socio-economic communities (NZ Drug Foundation 2022).

In the 2019/2020 New Zealand Health Survey, the Bay of Plenty, Eastern and Northland Police districts reported to have the highest consumption of methamphetamine when compared to other Police districts through their wastewater testing (Parliamentary Service 2021; Evidence Based Policing Centre 2021).

Methamphetamine has been detected in every community in New Zealand (through wastewater testing). This drug can cause extreme harm to those who use it, as well as their whānau and community (Evidence Based Policing Centre 2021). In New Zealand, the estimated total consumption of methamphetamine for 2019 was 743 kg (McFadden et al 2022).

In New Zealand, the street value of methamphetamine is said to vary between regions. The national median price in 2018/2019 was $500 per gram. Lower prices are more likely to be seen in the central and upper North Island, and in areas closer to international smuggling routes. Higher concentrations of clandestine laboratories in these regions is also thought to contribute to the lower price (Parliamentary Services 2021). Methamphetamine manufacture, use and abuse continues to be a problem for New Zealand.

## 4.2 General pharmacology

MAPA, APAAN, APAA, P2P methyl glycidic acid and P2P methyl glycidate are used in the synthesising process for manufacturing methamphetamine, as opposed to being drugs intended for consumption. There is limited evidence on the pharmacology and physiological properties of these substances. However, if deliberately consumed as a precursor substance at high dosing, it would be likely that these substances would cause harm.

## 4.3 Risk to public health

While these amphetamine precursor substances may not pose a direct risk to public health, their detection in the community can indicate the presence of clandestine laboratories producing methamphetamine which has a range of public health risks. The primary risk of these substances is their ease of conversion into the end-product of methamphetamine.

Prolonged use of methamphetamine is associated with difficulty sustaining jobs, risky sexual behaviour, break-up of significant relationships, children being taken into care, negative outcomes in babies and infants, and involvement in crimes both under the influence of methamphetamine, or to sustain their methamphetamine use (Evidence Based Policing Centre 2021). People who use methamphetamine have also been demonstrated to be more likely to use other drugs. Use of multiple stimulants by a user can also increase their risk of serious health outcomes and overdose (Evidence Based Policing Centre 2021). Organised crime groups associated with methamphetamine manufacture and distribution are increasingly armed and likely to be more willing to carry out serious attacks and violence (Evidence Based Policing Centre 2021).

In New Zealand methamphetamine manufacturing laboratories are experiencing a resurgence (Evidence Based Policing Centre 2021). A report from the University of Auckland outlined that methamphetamine is relatively easily manufactured in a range of dwellings including houses, motel rooms and car boots. It was also found that the strongest predictor for areas being at greater risk of harbouring a clandestine laboratory were those with high community-level deprivation (The University of Auckland 2017). Many of these methamphetamine manufacturing laboratories are on a commercial scale, and able to produce large quantities of methamphetamine compared to those previously detected in the country. It has also been noted that there is still significant demand for New Zealand manufactured methamphetamine due to it being considered purer than imported methamphetamine, enabling it to be sold domestically at a higher price. The quantity of New Zealand manufactured methamphetamine continues to meet market demand (Evidence Based Policing Centre 2021).

Manufacturing processes are risky from two different perspectives. Manufacturing precursors from pre-precursors can involve a range of strong acids and solvents. These substances are flammable and explosive. The risk of fires and explosions is greater when methamphetamine is manufactured from a precursor, than where pre-precursors are converted to precursors. Whilst the risk maybe lower in this later process, the risk is not negligible (ESR, personal communications, August 2022). The substances are also directly hazardous to the human body. Where they come in contact with the skin they can cause burns, and can be absorbed through the skin into the bloodstream, causing other toxic effects within the body. Where inhaled, they can cause burns within the airways (ESR, personal communications, August

2022; The University of Auckland 2017). Children who reside in methamphetamine manufacturing laboratories are at increased risk of being caught in fires and explosions, and being placed at risk of poisoning, injury, accidental death, burns, and hypodermic needle and razor blade injuries (Evidence Based Policing Centre 2021).

### 4.4 New Zealand Drug Harm Index

While there is no New Zealand Drug Harm Index information on these methamphetamine pre-precursors, there is evidence of the harm caused by methamphetamine. The 2020 New Zealand Drug Harm Index (the Index) provides a comprehensive evaluation of the costs of harmful illicit drug use, including methamphetamine. The 2020 report concluded that, of all the illicit drugs listed, methamphetamine caused the most overall harm in New Zealand (McFadden et al 2022).

Personal harm caused from methamphetamine including premature death, serious injury or minor injury totalled $404.52 million as outlined in the 2020 index. The Index also stated that community harm caused by methamphetamine, including harm to family and friends, acquisitive crime, reinvestment in other crime and tax revenue foregone totalled $418.980 million (McFadden et al 2022).

## 5 CLASSIFICATION

### 5.1 New Zealand classification and regulation

MAPA, APAAN, APAA, P2P methyl glycidic acid and P2P methyl glycidate are not currently regulated under the Misuse of Drugs Act 1975, Medicines Act 1981 or Psychoactive Substances Act 2013.

### 5.2 International classification and regulation

*Australia*

There is no federal law in Australia that lists these substances. However, they are controlled differently between their states and territories.

- *Australian Capital Territory*: Under the Drugs of Dependence Act 1989, APAAN is listed in the Criminal Code Regulation 2005. However, none of the other precursors are currently listed under this regulation, and are therefore not controlled under the Drugs of Dependence Act 1989 (ACT Government 2019).
- *New South Wales*: Under the Drug Misuse and Trafficking Act 1985, all 5 substances are listed as Schedule 1 precursor substances (NSW Government 2021).
- *Northern Territory*: Under the Misuse of Drugs Act 1990, none of the 5 precursors are currently listed and so are not regulated under the legislation (Northern Territory Government 2020).
- *Queensland*: The 5 precursors are not currently regulated under this state legislation.
- *South Australia*: Under the Controlled Substances Act 1984, APAAN is a Schedule 2-Controlled precursor. However, none of the other precursors are scheduled under this legislation (South Australia Government 2021).

- *Tasmania*: Under the Misuse of Drugs Act 2011, APAAN is scheduled as a controlled precursor. However, none of the other precursors are scheduled under this legislation (Tasmanian Government 2021).
- *Victoria*: Under the Drugs, Poisons and Controlled Substances Act 1981, APAA, APAAN, MAPA and P2P methyl glycidate are Schedule 1-Category 1 precursor chemicals. P2P methyl glycidic acid is not currently regulated under this legislation (Victoria Government 2021).
- *Western Australia*: The 5 precursors are not currently regulated under this state legislation.

#### *United Kingdom*

All 5 substances are listed as Category 1 drug precursor chemicals controlled by The Drug and Firearms Licensing Unit (Home Office 2021).

#### *United States*

Under the Controlled Substances Act 1971, APAA, APAAN and MAPA are listed as regulated chemicals. P2P methyl glycidic acid and P2P methyl glycidate are not regulated under this legislation (DEA Diversion 2022).

#### *Canada*

Under the Controlled Substances Act 1996, APAAN is scheduled as a Class A precursor. P2P methyl glycidate and APAA are also regulated as Class A precursors as derivatives and analogues and salts of derivatives and analogues of 1-Phenyl-2-propanone. MAPA and P2P methyl glycidic acid are not scheduled under this legislation (Government of Canada 2022).

### 5.3 UN classification

Amphetamine precursor scheduling under the UN Conventions:

- APAAN was scheduled under Table I of the 1988 Convention in 2014 (INCB 2014).
- APAA and MAPA were scheduled under Table I of the 1988 Convention in 2019 (INCB 2019, UN INCB 2019).
- P2P methyl glycidic acid and P2P methyl glycidate are not currently scheduled under any of the UN Conventions and have not been considered by the ECDD (United Nations 2022).

## 6 OTHER RELEVANT INFORMATION

### 6.1 Background and history

Most of the chemicals that have emerged in recent years for manufacturing amphetamine and methamphetamine are closely related in chemical structure to the chemicals listed in Table I and II of the 1988 Convention. The substances that have emerged are converted into a related controlled chemical by a readily applicable means (INCB 2021).

### 6.2 Anticipated future trends

In July 2021, China banned several methamphetamine pre-precursors including MAPA and APAA. The Chinese regulations on these substances (MAPA and APAA) are likely to impact

their presence and availability in New Zealand. The previously seized precursors have originated from China. This may indicate that these precursor substances are less likely to be seen in New Zealand again (NDIB 2022).

Through well-established networks across international borders, the illicit manufacture and production of methamphetamine continues to evolve. Pre-precursors are trafficked in many forms, allowing traffickers to expand their markets. Worldwide organised crime groups enable successful import and export of these precursor substances. The precursor market continues to evolve with known precursors being replaced with chemically modified alternatives which are not regulated under domestic and international control (Stoneberg et al 2018).

# 7 CLASSIFICATION OPTIONS

Note: Although the amphetamine precursors in this paper are being considered together, different scheduling recommendations can be applied to each substance under consideration.

Note: The options provided reflect the use of these substances being precursors, therefore options for scheduling as controlled drugs have not been provided. If it considered that scheduling as a controlled drug may be more appropriate, further information can be requested from the Secretariat.

### Option 1 – Maintain status quo

If the status quo is recommended, MAPA, APAAN, APAA, P2P methyl glycidic acid, and P2P methyl glycidate will continue to be unregulated under the Misuse of Drugs Act 1975, Medicines Act 1981 and the Psychoactive Substances Act 2013. There would continue to be no restrictions on the supply, manufacture, or importation of these substances.

### Option 2 – Schedule MAPA, APAAN, APAA, P2P methyl glycidic acid and P2P methyl glycidate as precursor substances under the Misuse of Drugs Act 1975

If scheduling these substances under Schedule 4 of the Misuse of Drugs Act 1975 is recommended, penalties for supply, manufacture and knowingly committing an offence for these substances will be incurred as outlined in Section 12AB and 12AC of the Misuse of Drugs Act 1975. This includes penalties for the import or export of a precursor substance knowing that the precursor substance is going to be used to commit an offence, and penalties for the import and export of a precursor substance without a reasonable excuse.

- Part 1 of Schedule 4 of the Misuse of Drugs Act 1975 contains substances in Table I of the 1988 Convention, with narrow uses and traded in limited volumes on the international market.
- Part 2 of Schedule 4 of the Misuse of Drugs Act 1975 contains substances in Table II of the 1988 Convention, with a wide range of uses and traded in large quantities.
- Part 3 of Schedule 4 of the Misuse of Drugs Act 1975 contains substances with narrow uses and a high risk of diversion.

Substances commonly used as ingredients in the manufacture of illicit substances should generally mirror the precursors in the 1988 Convention.

**Table 1: Penalties for precursor substances under the Misuse of Drugs Act 1975**

| Schedule 4 – Precursor Substances |
|---|
| Up to 7 years imprisonment for importation, exportation, manufacture, production, or supply know the substance is to be used for the commission of an offence. |
| Up to 1 year imprisonment, or $1,000 fine, or both, for importing or exporting a precursor substance without a reasonable excuse. |
| Up to 5 years imprisonment for possession. |

# 8 FUTURE ACTIONS

If the Committee recommends that MAPA, APAAN, APAA, P2P methyl glycidic acid and P2P methyl glycidate should be scheduled under the Misuse of Drugs Act 1975, the Secretariat will draft a letter from the Committee to the Minister of Health to progress the advice.

The Secretariat may undertake targeted consultation with industry to ensure impacts on legitimate uses of MAPA, APAAN, APAA, P2P methyl glycidic acid and P2P methyl glycidate are reasonable and minimised. If the status quo is kept, no further action is required.

Note: Decisions on each of the substances presented in this paper may be made independently of each other.

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