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Secretariat for Multidimensional Security

**GUIDE TO BEST PRACTICES FOR THE
INTRA BATCH TRACEABILITY SYSTEM**

**Meeting of the Group of Experts on Chemical Substances and Pharmaceutical Products of
CICAD, OAS**

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Coordinating Country: Argentina

Group member countries: representatives of Prelac, Peru, Chile, Uruguay, Bolivia, United States of America, Ecuador, Trinidad and Tobago, Haiti, Brazil and Argentina.

OBJETIVE:

Precursor chemicals play an essential role in the processing and manufacture of narcotics, but they are also extremely important in our daily lives since, either in pure or compound form, they are part of countless products that are vital in today's world.

CICAD therefore recognizes the significance of both, the role played by the chemical industry in helping our society advance as well as the threat that the improper use of these substances represents if they were to fall in the hands of illegal operators.

We know that in order to implement efficient controls, it is essential to have the cooperation of the main actors involved in this area; the entrepreneurs who, in some shape or form, work with the so called precursor chemicals.

The private sector must understand the importance of having businesses operate as conscientious corporate citizens and with institutional responsibility given the sensitivity of the substances they handle.

Thus, if businesses act responsibly and "do what they should do," and they themselves exercise control over their operations and their personnel and observe all aspects regarding the legal use of those chemical substances, their business reputation will be enhanced and the risk of diversion of chemical precursors toward illegal channels will be reduced.

An entrepreneur's social responsibility, which in the past was limited mainly to increasing wealth and creating employment, today must expand to incorporate areas of concern to society such as protecting the environment, combating drug trafficking, and citizen participation in those areas.

It is therefore imperative to establish a system to trace and identify each container within the same batch of precursor chemicals manufactured or repackaged for later distribution, which will make it possible to identify precisely who was involved in the latter stages of the commercialization chain of controlled chemical substances found in illegal narcotics laboratories.

NUMERIC CONTROL INTRA-BATCH TRACING SYSTEM

The purpose of this guide to best practices is to provide guidance to businesses in Member States in order to implement a "**Numeric Control Intra-batch Tracing System**" to determine who bought each container of controlled chemical substances.

If the business selling (manufacturer or re-packer) chemical substances can easily identify who purchased each container of chemical substances by a specific batch number, the control authority that uncovers a case of illegal trafficking in controlled chemical substances found in a clandestine narcotics laboratory, may determine:

- If the seller acted within the provisions of the law, selling the precursor to another registered business entity.

- That the reputation of the firm remains unblemished and that, in any event, it was the victim of an illegal operation.
- What was the reverse commercialization chain of that merchandise until finding who used it to manufacture narcotics and thus identify the user who consented to carry out such illegal activities.
- That the operator implementing the system is trustworthy and is truly willing and committed to collaborate with the State in the control, investigation and unmasking of those who were accomplices in these activities and who could have received monetary or other types of benefits.

Depending on their material and financial resources, businesses may opt for one or a combination of the tracing systems described below.

Afterwards, each manufacturing or re-packaging business would have to inform the control authority in their country of which system they had chosen.

Container

The various options available relating to security and monitoring of bottles or containers of controlled chemical substances for analysis, technical purposes or commercial use are described below.

Plastic bottles may be embossed or marked with batch and container number using permanent laser ink or by using bar code.

Likewise, glass bottles may be manufactured with batch and container number embossed on the bottom or any other part of the bottle.

Microchip RFID:

This consists of a tiny radio-frequency tracking device, about the size of a pinhead that can be placed in the container itself and is capable of holding large amounts of data about the product. This type of device, bound to supplant current bar codes, can hold any data about a particular substance, such as: the container number within a specific batch, who purchased that substance, who manufactured it, who re-packaged it, or any other data of interest.

Label

Labels can be etched to include container and batch number or a bar code in laser ink, and glued to the bottle or container by using a permanent adhesive material.

Encrypted or secret data:

It would also be helpful if businesses assigned a secret number to each container as a control measure.

In this way, when a container is being traced, there would be an extra piece of information that criminal organizations would not be able to adulterate or erase, since it would not arouse suspicion as the batch or the container number would.

Along the same lines, if the batch number and the container number were to be altered, an extra piece of information would be available to easily identify the container of a specific batch.

The invoice or commercial document

The tracing system suggested in this document does not end with the mere identification of the bottle and/or label, but it is also necessary that the commercial documentation (invoice, packing slip, etc.) include the batch and container number of the product or substance purchased or sold.

At the same time, it would be helpful if the business selling the substance kept an internal record of which individual customer bought which specific container.

A sample invoice identifying the batch number and the container number of the substance sold is attached below.

