CBP and Trade Automated Interface Requirements

Department of Justice Drug Enforcement Administration (DEA)

Implementation Guide for the Customs and Trade Automated Interface Requirements (CATAIR) in Support of the Automated Commercial Environment (ACE)

V2.6 March 23, 2017







Document History:

Date of Change	Version	Section	Description
8/17/2015	1.0	All	Initial draft
10/07/2015	1.1	All	The PGA controls used by the DEA for controlled substances and listed chemicals were updated in this document.
10/29/2015	2.0	2.0	Changes made to address single entry of PG02P, removal of drug names and company names, addition of PG22.
11/24/2015	2.1	2.0	DEA form names and DEA form examples inserted. PG02 Product Code Qualifier and PG19 Entity Identification Code added as optional items.
2/10/2016	2.2	2.0	Added PG06 for Country Code and removed PG19 with "EX" and PG20 for Country code. Added PG30 for Arrival Date.
5/10/2016	2.3	2.0	Updated IG to provide further guidance for Record Identifiers.
12/14/2016	2.4	2.2, 2.3	Update of parent/child relationship of records (IF).
1/5/2017	2.5	2.2, 2.3	Replace terms "product" and "component" for clarity.
3/23/2017	2.6	2.2, 2.2.2, 2.3	Removal of the requirement to upload a DEA document into the DIS. This eliminates the "Y" in position 17 of the PG01 record.

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1.0 Introduction

This document serves as the Implementation Guide (IG) for the Customs and Trade Automated Interface Requirements (CATAIR) in support of the Automated Commercial Environment (ACE) for the import of controlled substances and listed chemicals into the United States.

1.1 Purpose

The U.S. Customs and Border Protection (CBP) will use the ACE system to determine whether documents required by the DEA have been filed with the DEA for imports of controlled substances and listed chemicals into the United States prior to their actual arrival.

1.2 Authority

The DEA implements and enforces Titles II and III of the Comprehensive Drug Abuse Prevention and Control Act of 1970, as amended. 21 U.S.C. 801–971. Titles II and III are known as the "Controlled Substances Act" and the "Controlled Substances Import and Export Act," respectively, and are collectively referred to as the "Controlled Substances Act" or "CSA". The CSA is designed to prevent, detect, and eliminate the diversion of controlled substances and listed chemicals into the illicit market while ensuring an adequate supply is available for the legitimate medical, scientific, research, and industrial needs of the United States. Controlled substances have the potential for abuse and dependence and are controlled to protect the public health and safety. Controlled substances generally include narcotics, stimulants, depressants, and hallucinogens that have a potential for abuse and physical and psychological dependence, as well as anabolic steroids. Listed chemicals are separately classified based on their use and importance to the illicit manufacture of controlled substances (List I or List II chemicals). Through the enactment of the CSA and its amendments, Congress has established a closed system of distribution making it unlawful to handle (manufacture, distribute, reverse distribute, dispense, conduct research, engage in narcotic treatment or maintenance, import, export, collect, or conduct chemical analysis) or otherwise possess any controlled substance or listed chemical except in a manner authorized by the CSA.

In order to maintain this closed system of distribution, the CSA requires handlers of controlled substances to be registered at each principal place of business or principal place of professional practice where such substances are manufactured, distributed, dispensed, imported, or exported. Handlers of List I chemicals must be registered at each principal place of business where such chemicals are imported or exported; and they must be registered at each principal place of business or principal place of professional practice where such substances are manufactured or distributed. A "registrant" is any person who is registered pursuant to either section 303 or section 1008 of the CSA (21 U.S.C. 823 or 958). Registrants are permitted to possess controlled substances and List I chemicals as authorized by their registration and must comply with the applicable requirements associated with their registration. A "regulated person" means a person who manufactures, distributes, imports, or exports a listed chemical, a tableting machine, or an encapsulating machine or who acts as a broker or trader for an international transaction involving a listed chemical, a tableting machine, or an encapsulating machine. Regulated persons who engage in "regulated transactions," defined at 21 U.S.C. 802(39), are subject to specified recordkeeping and reporting requirements pursuant to 21 U.S.C. 830, 971; 21 Code of Federal Regulations part 1310. The Attorney General has delegated these authorities to the Administrator of the DEA,

who in turn has re-delegated many of these authorities to the Deputy Administrator of the DEA and the Deputy Assistant Administrator of the DEA Office of Diversion Control. Within the DEA, the Office of Diversion Control is the strategic focus area that carries out the mandates of the CSA to ensure that adequate supplies of controlled substances and listed chemicals are available to meet legitimate domestic medical, scientific, industrial, and export needs. The Office of Diversion Control carries out the mission of the DEA to prevent, detect, and eliminate the diversion of these substances into the illicit drug market. Activities in support of the Office of Diversion Control and its mission include: determination of program priorities; field management oversight; coordination of major investigations; drafting and promulgating regulations; the design and proposal of national legislation; advice and leadership on State legislation/regulatory initiatives; oversight of the importation and exportation of controlled substances and listed chemicals; establishment of national drug production quotas; activities related to drug scheduling and compliance with international treaty obligations; the design and execution of diplomatic missions; computerized monitoring and tracking of the distribution of certain controlled substances; planning and allocation of program resources; and liaison efforts with industry and their representative associations as well as the DEA's regulatory and law enforcement counterparts at the federal, state and local levels.

1.3 General Distribution

This document may be released for general distribution.

2.0 Guidance for Trade

The DEA authorizes all imports of controlled substances and listed chemicals prior to their arrival into the United States. The PGA Message Sets for imports of controlled substances and listed chemicals must have the following Record Identifiers: OI, PG01, PG02, PG04, PG06, PG14, PG19, PG22, and PG30, which identify the data deemed pertinent to the DEA. As such, the DEA requires the mandatory (M) entry of the data elements in the tables listed in section 2.2.1 through 2.2.10 for these Record Identifiers with the exception of the PG02 Product Code Qualifier (6-9) and PG19 Entity Identification Code (8-10) fields, which are optional (O).

2.1 General Rules for Data Submission

The following general rules only apply to the DEA, not to other PGAs. The Record Identifiers required by the DEA adhere to the same general rules for data submission as those listed in the PGA Message Set INPUT Record Layouts section of the ACE ABI CATAIR document.

2.2 PGA Controls used by the DEA for controlled substances and listed chemicals

The Record Identifier OI must occur one time. The DEA does not require an entry in the Commercial Description.

The Record Identifier PG01 must occur one time. The PGA Line Number must be entered and is dependent on the line number of other PG01 records entered. The Government Agency Code must be "DEA". The Government Agency Program Code must be "DEA". The Electronic Image Submitted must be blank. The DEA has removed the requirement that an image must be uploaded into the Document Imaging System (DIS). The Confidential Information Indicator must be "Y" unless the substance is disclaimed because it is not a controlled substance or listed chemical, or it is an Excluded Transaction 1 (21 CFR § 1310.08), or where advance notification is waived 2 (21 CFR § 1313.12). In such a case, this field must be blank. If the substance is disclaimed an "A" must be entered in Disclaimer. Please note that no further Record Identifiers are required for the DEA if the substance is disclaimed.

The Record Identifier PG02 with an Item Type = "P" must occur one time. The DEA does not require any other information for this record identifier. This Record Identifier is a parent record. Therefore, per the PGA CATAIR, it must be followed by the PG06, PG14, PG19, PG22, and PG30. Thereafter, the PG02 with an Item Type = "C" and the PG04 must occur as a pair for each controlled substance or listed chemical being imported in a single transaction.

The Record Identifier PG06 must occur one time. The Source Type Code must be "CSH". The Country Code must be entered for the country from where the controlled substance or listed chemical was shipped into the United States as provided to DEA by the registrant or regulated person.

¹ U.S. imports of hydrochloric and sulfuric acids, Methyl Isobutyl Ketone (MIBK), anhydrous hydrogen chloride, chemical mixtures that contain acetone, ethyl ether, 2-butanone, and/or toluene, unless regulated because of being formulated with other List I or List II chemical(s) above the concentration limit.

² U.S. imports of the following listed chemicals- Acetone, 2-Butanone (or Methyl Ethyl Ketone or MEK), Toluene -do not require a DEA-486 form. The registrant or regulated person must submit a quarterly report for the import of these substances to the DEA no later than the 15th day of the month following the end of each quarter.

The Record Identifier PG14 must occur one time. The LPCO Transaction Type must always be "1". The DEA issues one-time use only permits and declarations for each shipment of controlled substances or listed chemicals. The LPCO Number must be entered. This number is seven alphanumeric characters in length (do not include the dash and amendment number) and can be obtained from the registrant or regulated person.

The Record Identifier PG19 must occur one time. The Entity Role Code must be "LAP". The Entity Identification Code is an optional entry field but must be "164" if entered. The Entity Number must be the DEA Registration or company ID number of the U.S. party authorized by the LPCO. This number is nine alphanumeric characters in length.

The Record Identifier PG22 must only occur one time. Use the appropriate Document Identifier code listed in the table below for the form type.

DEA Form	Information	Document Identifier
DEA-35	Import permit for the import of any controlled substance listed in schedule I or II or any narcotic controlled substance listed in schedule III, IV, or V	911
DEA-236	Declaration for the import of any non-narcotic controlled substance listed in schedule III, IV, or V	921
DEA-486	Declaration for the import of any List I or II substance except Ephedrine, Pseudoephedrine, or Phenylpropanolamine	922
DEA-486A	Declaration for the import of Ephedrine, Pseudoephedrine, or Phenylpropanolamine	923

The Record Identifier PG30 must only occur one time. The Inspection/Laboratory Testing Status must be "A". The date of arrival must be entered in the Arrival date field. The format for this field must be MMDDCCYY.

The Record Identifier PG02 with an Item Type = "C" must occur for each controlled substance or listed chemical in a single transaction. The Product Code Qualifier is an optional entry field but must be "CSA" if entered. The Product Code Number must be the DEA drug code of the controlled substance or listed chemical. Each controlled substance and listed chemical has its own unique DEA drug code. These codes are four characters in length, all numeric.

The Record Identifier PG04 must occur for each Record Identifier PG02 with an Item Type = "C". The Quantity of Constituent Element must be the base weight (not the salt or derivative weight) of the controlled substance or listed chemical. This field must be padded with zeros to the left; there are two (2) implied decimal places. Please note that the DEA will convert the base weight of a component from kilograms to grams, grams to milligrams, or milligrams to micrograms to ensure the base weight is not equal to zero (ex. 0.0025 G = 2.50 MG) The Unit of Measure (Constituent Element) must be the base weight's unit of measure.

2.2.1 Record Identifier OI

Data Element	Position	Status	Information
Commercial Description	11 – 80	М	DEA does not require an entry for this field

2.2.2 Record Identifier PG01

Data Element	Position	Status	Information
PGA Line Number	5 – 7	М	Dependent on other PGA Line Numbers
Government Agency Code	8 – 10	М	"DEA"
Government Agency Program Code	11 – 13	М	"DEA"
Electronic Image Submitted	17		No longer required by the DEA (leave blank)
Confidential Information Indicator	18	С	"Y" if not disclaimed, blank if disclaimed
Disclaimer	80	С	Blank if not disclaimed, "A" if disclaimed

2.2.3 Record Identifier PG02 with Item Type = P

Data Element	Position	Status	Information
Item Type	5	М	"P" for product

2.2.4 Record Identifier PG06

Data Element	Position	Status	Information
Source Type Code	5 – 7	М	"CSH" for Country of Shipment
Country Code	8 – 9	М	Country Code of the country from where substance is shipped as provided to DEA by the registrant or regulated person

2.2.5 Record Identifier PG14

Data Element	Position	Status	Information
LPCO Transaction Type	5	М	"1" for single use
LPCO Number	9 – 41	М	DEA permit or transaction ID number

2.2.6 Record Identifier PG19 (U.S. Entity)

Data Element	Position	Status	Information
Entity Role Code	5 – 7	М	"LAP" for the registrant or regulated person
Entity Identification Code	8 – 10	0	"164"
Entity Number	11 – 25	М	DEA registration or company ID number

2.2.7 Record Identifier PG22

Data Element	Position	Status	Information
Document Identifier	6 – 12	М	Use Document Identifier code (see page 7) for the DEA form type to be uploaded into the Document Imaging System (DIS)

2.2.8 Record Identifier PG30

Data Element	Position	Status	Information
Inspection/Laboratory Testing Status	5	М	"A" for Anticipated arrival information
Arrival date	6 – 13	М	Date of arrival (MMDDCCYY)

2.2.9 Record Identifier PG02 with Item Type = C

Data Element	Position	Status	Information
Item Type	5	М	"C" for component
Product Code Qualifier	6 – 9	0	"CSA"
Product Code Number	10 – 28	М	DEA drug code

2.2.10 Record Identifier PG04

Data Element	Position	Status	Information
Quantity of Constituent Element	57 – 68	М	Base weight of the controlled substance or listed chemical, zero filled to the left with 2 implied decimal places
Unit of Measure (Constituent Element)	69 – 73	М	Unit of measure ("KG", "G", "MG", "MCG") of Quantity of Constituent Element

2.3 DEA PGA Message Set Examples

The following are examples of PGA Message Sets for the import of DEA regulated substances.

The first example (2.3.1) is an import of a schedule III non-narcotic controlled substance (anabolic steroid) from China. In order to be compliant with 21 CFR (Code of Federal Regulations) § 1312, the registrant had to submit a DEA-236 form (see DEA-236 form example) to the DEA at least 15 days prior to the importation of this substance into the United States. The DEA reviewed the form and subsequently issued the registrant a transaction identification number (1QQSOU4) for this import.

The second example (2.3.2) is an import of two drug products that contain the same listed chemical (pseudoephedrine) of different quantities from India. These drug products also have different strengths but a product's strength is not reported in the message set. In order to be compliant with 21 CFR § 1313, the registrant had to submit a DEA-486A form (see DEA-486A form example) to the DEA at least 15 days prior to the importation of these drug products into the United States. The DEA reviewed the form and subsequently issued the registrant a transaction identification number (Y27TFG7) for this import.

The third example (2.3.3) is an import of two batches of a schedule III narcotic substance (buprenorphine) of different quantities from the United Kingdom. In order to be compliant with 21 CFR § 1312, the registrant had to submit a DEA-357 form, which is an application for a permit to import, to the DEA prior to the importation of these batch into the United States. The DEA reviewed the application and subsequently issued the registrant a DEA permit to import (see DEA-35 example) with permit number (FU77R3A) for this import.

2.3.1 DEA-236 form

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1 2 3 4 5 6 7 8 9 6 7 8 9 6 7 8 9 6 7 8 9 6 7 8 9 6 7 8 9 6 7 8 9 6 7 8 9 6 7 8 9 6 7 8 9 6 7 8 9 6 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7 8 9 8 7
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In this example, a schedule III non-narcotic controlled substance (anabolic steroid) is being imported from China.

- PG01:
 - o PGA Line Number
 - o Government Agency Code ("DEA")
 - o Government Agency Program Code ("DEA")

Electronic Image Submitted (No longer required by the DEA, leave blank)

- o Confidential Information Indicator ("Y")
- PG02P: No additional data required
- PG06:
 - Source Type Code ("CSH")
 - Country Code ("CN")
- PG14:
 - LPCO Transaction Type ("1")
 - LPCO Number ("1QQSOU4")
- PG19:
 - o Entity Role Code ("LAP")
 - o Entity Identification Code ("164"); this is an optional entry
 - Entity Number ("RD0445355"). This number is the registration or company identification number of the U.S. LPCO Authorized Party
- PG22: Document Identifier ("921")
- PG30:
 - Inspection/Laboratory Testing Status ("A")
 - o Arrival date ("11092015")
- PG02C:
 - o Product Code Qualifier ("CSA"); this is an optional entry
 - Product Code Number ("4000")
- PG04:
 - Quantity of Constituent Element ("000011440000"). This quantity (114,400.00) is the base weight of the component
 - Unit of Measure ("G")

С	U.S. Department of Jus ONTROLLED SUBSTANC (Read Instruction	OMB APPROVAL No. 1117-0009 EXPIRATION DATE: 9/30/2016 See reverse for Privacy Act				
1.	✓ IMPORT DECLARATION	Nonnarc	otic Substances in	Schedules III. IV. V	U.S. CUSTOMS	
ONE					CERTIFICATION	
	EXPORT DECLARATION	Nonnarc Schedule		Schedules III, and IV and all substances in	Date of Departure/Arrival	
	(Name and Address)		BROKER OR FORV Address)	VARDING AGENT, IF USED (Name and	Date of Certification	
	OGI-TEST MY NAVY DRIVE		,			
	STON, VA 22202				Signature of Customs Official	
					DEA Transaction ID	
	TRATION NO. RD0445355	TVRORTER			1QQSOU4-2	
	OLLED SUBSTANCES TO BE IMPORTED OR E AND QUANTITY OF DRUG OR PREPARATION		2b. CONTROLLED	SUBSTANCE CONTENT OF DRUG OR	2c. DATE IMPORTED/EXPORTED AND	
(Enter names as shown on labels; numbers and sizes of			PREPARATION ex	pressed as acid, base or alkaloid. (Enter	ACTUAL QUANTITY	
	strength of tablets, capsules, etc., CSA Dru	ıg Code		ed substances contained in the drug,	(Completed by registrant at time of	
and NDC N			compound, or pre		transaction)	
	DLDENONE - 1,144 BOTTLES, 100 1,144 X 100 = 114,400 GRAMS (BASE) RAMS/BOTTLE		: 114,400 GRAMS (BASE)			
	CODE 4000					
NDC # 0	G4000-0200-**					
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2.3.2 **DEA-486A form**

In this example, two drug products containing a List I chemical (pseudoephedrine) are being imported from India.

- PG01:
 - o PGA Line Number
 - Government Agency Code ("DEA")
 - o Government Agency Program Code ("DEA")
 - Electronic Image Submitted (No longer required by the DEA, leave blank)
 - o Confidential Information Indicator ("Y")
- PG02P: No additional data required
- PG06:
 - Source Type Code ("CSH")
 - Country Code ("IN")
- PG14:
 - o LPCO Transaction Type ("1")
 - LPCO Number ("Y27TFG7")
- PG19 (#1):
 - Entity Role Code ("LAP")
 - o Entity Identification Code ("164"); this is an optional entry
 - Entity Number ("RD0445355"). This number is the registration or company identification number of the U.S. LPCO Authorized Party
- PG22: Document Identifier ("923")
- PG30:
 - Inspection/Laboratory Testing Status ("A")
 - o Arrival date ("10172015")
- PG02C (#1):
 - o Product Code Qualifier ("CSA"); this is an optional entry
 - o Product Code Number ("8112")

- PG04 (#1):
 - o Quantity of Constituent Element ("000000978096"). This quantity (9,780.96) is the base weight of the component
 - o The Unit of Measure ("G")
- PG02C (#2):
 - o Product Code Qualifier ("CSA"); this is an optional entry
 - o Product Code Number ("8112")
- PG04 (#2):
 - o Quantity of Constituent Element ("000000391140"). This quantity (3,911.40) is the base weight of the component
 - o The Unit of Measure ("G")

DEA-486A form example

		,, ,	anoiai	Pseudoep nine				Administrat
SEE INSTRUCTION	OMB Approval No. 1117-00			7-0023	0023 Expiration Date: 2/29/2016			
1. Type of Submission:	n: 🗸 ORIGINAL 🗌 AMENDED 🗌 WITHDRAWAL DEA			DEA TRANSA	DEA TRANSACTION ID NUMBER: Y27TFG7-0			
NOTICE! A 15-day advance notice	e is required for all U.S. i	imports of Ephe	edrine, Ps	seudoephedrine	, and Phen	ylpropano	olamine.	
2a. NAME OF IMPORTER DEA-ODGI-TEST			600 AR	DRESS OF IMP MY NAVY DRIV GTON, VA 2220	/E			
2c. DEA REGISTRATION NUMBER: RD04	145355		1					
2d. TELEPHONE NO. OF IMPORTER 202-307-1000	2e. E-MAIL ADDRES	S OF IMPORT	OF IMPORTER 2f. PURCHAS *** TEST FOR				ASE/INVOICE NO. (optional) RM ***	
3a. NAME OF FOREIGN EXPORTER FOREIGN COMPANY	PLOT NOS.	3b. ADDRESS OF FOREIGN EXPORTER PLOT NOS. 81/1, 81/3, & 81/5 NEW DELHI, INDIA						
4a. NAME OF FOREIGN MANUFACTURES "Same as 3a") SAME AS 3A	R (If same as 3a, enter	4b. ADDRE	SS OF FO	OREIGN MANU	FACTUREF	?		
5a. NAME OF FOREIGN DISTRIBUTOR (If	applicable)	5b. ADDRE	SS OF FO	OREIGN DISTR	IBUTOR (If	applicabl	le)	
EPHEDRI	NE, PSEUDOEPHEDRI							
		NE, AND PHE	NYLPRO	PANOLAMINE	ТО ВЕ ІМР	ORTED		
appearing on label or container and DEA Chemical Code (see 21 CFR	6b. Import Quota	6c. Number (express chemica	of contain as base) I listed. F	ners, size, net w) in kilograms fo For drug product	veight r each	6d. Actu each Actu	ual Date of Import; h chemical importe ual Net Weight (To upleted by importer	d and its be
appearing on label or container and DEA Chemical Code (see 21 CFR §1310.02). COUGH & COLD TABLETS CONTAINING	6b. Import Quota Current year Quota [2015]	6c. Number (express chemica number	of contain as base) I listed. F of dosage	ners, size, net w) in kilograms fo For drug product	veight r each ts, show	6d. Actu each Actu	h chemical importe	d and its be
DEA Chemical Code (see 21 CFR	Current year Quota	6c. Number (express chemica number 1,988 BOTT 120 MG/TAE	of contains as base) I listed. For dosage LES X 50 BLET = 1	ners, size, net w) in kilograms fo For drug product e units.	veight r each ts, show	6d. Actu each Actu	h chemical importe ual Net Weight (To	d and its be
appearing on label or container and DEA Chemical Code (see 21 CFR §1310.02). COUGH & COLD TABLETS CONTAINING PSEUDOEPHEDRINE (120'S) HCL	Current year Quota	6c. Number (express chemica number 1,988 BOTT 120 MG/TAE 11,928 GRA	of contain as base, I listed. For dosage LES X 50 BLET = 1	ners, size, net w) in kilograms for For drug product e units. TABLETS/BOT 1,928 GRAMS # = 9,780.96 Gi	reight r each ts, show	6d. Actu each Actu	h chemical importe ual Net Weight (To	d and its be
appearing on label or container and DEA Chemical Code (see 21 CFR §1310.02). COUGH & COLD TABLETS CONTAINING PSEUDOEPHEDRINE (120'S) HCL (8112)	Current year Quota [2015] 17,500 GRAMS Quota used to date for current year	6c. Number (express chemica number 1,988 BOTT 120 MG/TAB 11,928 GRA	of contain as base) I listed. F of dosage LES X 50 BLET = 1 MS X 829 LES X 50	ners, size, net w) in kilograms for For drug product e units. TABLETS/BOT 1,928 GRAMS # = 9,780.96 Gi	reight r each ts, show TTLE X RAMS	6d. Actu each Actu	h chemical importe ual Net Weight (To	d and its be
appearing on label or container and DEA Chemical Code (see 21 CFR §1310.02). COUGH & COLD TABLETS CONTAINING PSEUDOEPHEDRINE (120'S) HCL (8112) COUGH & COLD TABLETS CONTAINING PSEUDOEPHEDRINE (60'S) HCL (8112)	Current year Quota [2015] 17,500 GRAMS Quota used to date for current year 2,500 GRAMS Amount of Quota remaining 15,000 GRAMS	6c. Number (express chemica number 1,988 BOTT 120 MG/TAB 11,928 GRA	of contain as base) I listed. F of dosage LES X 50 BLET = 1 MS X 829 LES X 50	ners, size, net w in kilograms for drug product e units. TABLETS/BOT 1,928 GRAMS % = 9,780.96 Gi	reight r each ts, show TTLE X RAMS	6d. Actu each Actu com	h chemical importe ual Net Weight (To	d and its be).
appearing on label or container and DEA Chemical Code (see 21 CFR §1310.02). COUGH & COLD TABLETS CONTAINING PSEUDOEPHEDRINE (120'S) HCL (8112) COUGH & COLD TABLETS CONTAINING PSEUDOEPHEDRINE (60'S) HCL (8112) 7a. FOREIGN PORT OF EXPORTATION:	Current year Quota [2015] 17,500 GRAMS Quota used to date for current year 2,500 GRAMS Amount of Quota remaining 15,000 GRAMS	6c. Number (express chemica number 1,988 BOTT 120 MG/TAB 11,928 GRA	of contain as base) I listed. F of dosage LES X 50 BLET = 1 MS X 829 LES X 50	ners, size, net w in kilograms for drug product e units. TABLETS/BOT 1,928 GRAMS % = 9,780.96 Gi TABLETS/BOT GRAMS = 3,911.40 GR	reight r each ts, show TTLE X RAMS TTLE X 60 AMS	6d. Actu each Actu com	h chemical importe ual Net Weight (To ipleted by importer	d and its be).
appearing on label or container and DEA Chemical Code (see 21 CFR §1310.02). COUGH & COLD TABLETS CONTAINING PSEUDOEPHEDRINE (120'S) HCL (8112) COUGH & COLD TABLETS CONTAINING PSEUDOEPHEDRINE (60'S) HCL (8112) 7a. FOREIGN PORT OF EXPORTATION: 7b. DOMESTIC PORT OF IMPORTATION:	Current year Quota [2015] 17,500 GRAMS Quota used to date for current year 2,500 GRAMS Amount of Quota remaining 15,000 GRAMS NEW DELHI, INDIA MEMPHIS, TN	6c. Number (express chemica number) 1,988 BOTT 120 MG/TAE 11,928 GRA 1,590 BOTT MG/TABLET 4,770 GRAM	of contain as base) Illisted. For dosage LES X 50 BLET = 1 MS X 829 LES X 50 = 4,770 IS X 82%	ners, size, net w in kilograms for or drug product e units. TABLETS/BOT 1,928 GRAMS 6 = 9,780.96 GI TABLETS/BOT GRAMS 1 TABLETS/BOT GRAMS 2 = 3,911.40 GR	reight r each ts, show TLE X RAMS TLE X 60 AMS ROX. DEPA	6d. Actu each Actu com	h chemical importe ual Net Weight (To upleted by importer	d and its be).
appearing on label or container and DEA Chemical Code (see 21 CFR §1310.02). COUGH & COLD TABLETS CONTAINING PSEUDOEPHEDRINE (120'S) HCL (8112) COUGH & COLD TABLETS CONTAINING PSEUDOEPHEDRINE (60'S) HCL (8112) 7a. FOREIGN PORT OF EXPORTATION: 7b. DOMESTIC PORT OF IMPORTATION: 8. MODE OF TRANSPORTATION and NAM	Current year Quota [2015] 17,500 GRAMS Quota used to date for current year 2,500 GRAMS Amount of Quota remaining 15,000 GRAMS NEW DELHI, INDIA MEMPHIS, TN	6c. Number (express chemica number) 1,988 BOTTI 120 MG/TAE 11,928 GRA 1,590 BOTTI MG/TABLET 4,770 GRAM	of contain as base) I listed. For dosage LES X 50 BLET = 1 MS X 829 LES X 50 = 4,770 IS X 82% R: MAR	ners, size, net w in kilograms for drug product e units. TABLETS/BOT 1,928 GRAMS ### = 9,780.96 GI TABLETS/BOT GRAMS = 3,911.40 GR APPE APPE	reight r each ts, show TTLE X RAMS TTLE X 60 AMS ROX. DEPA ROX. ARRIV	6d. Actu each Actu com	h chemical importe ual Net Weight (To upleted by importer	d and its be).
appearing on label or container and DEA Chemical Code (see 21 CFR §1310.02). COUGH & COLD TABLETS CONTAINING PSEUDOEPHEDRINE (120'S) HCL (8112) COUGH & COLD TABLETS CONTAINING PSEUDOEPHEDRINE (60'S) HCL	Current year Quota [2015] 17,500 GRAMS Quota used to date for current year 2,500 GRAMS Amount of Quota remaining 15,000 GRAMS NEW DELHI, INDIA MEMPHIS, TN	6c. Number (express chemica number) 1,988 BOTTI 120 MG/TAE 11,928 GRA 1,590 BOTTI MG/TABLET 4,770 GRAM	of contain as base) I listed. For dosage LES X 50 BLET = 1 MS X 829 LES X 50 = 4,770 IS X 82% R: MAR	ners, size, net w in kilograms for drug product e units. TABLETS/BOT 1,928 GRAMS ### = 9,780.96 GI TABLETS/BOT GRAMS = 3,911.40 GR APPE APPE	reight r each ts, show TTLE X RAMS TTLE X 60 AMS ROX. DEPA ROX. ARRIV	6d. Acture act Acture a	h chemical importe ual Net Weight (To upleted by importer	d and its be).

2.3.3 DEA-35 form

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1 2 3 4 5 6 7 8 9 6 1 2 3 4 5 6 7 8 9 6 1 2 3 4 5 6 7 8 9 6 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 9 8 1 2 3 4 5 6 7 8 8 1 2 3 4 5 6 7 8 8 1 2 3 4 5 6 7 8 8 1 2 3 4 5 6 7 8 8 1 2 3 4 5 6 7 8 8 1 2 3 4 5 6 7 8 8 1 2 3 4 5 6 7 8 8 1 2 3 4 5 6 7 8 8 1 2 3 4 5 6 7 8 8 1 2 3 4 5 6 7 8 1 2 3 4 5 6 7 8 8 1 2 3 4 5 6 7 8 8 1 2 3 4 5 6 7 8 8 1 2 3 4 5 6 7 8 8 1 2 3 4 5 6 7 8 8 1 2 3 4 5 6 7 8 8 1 2 3 4 5 6 7 8 8 1
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In this example, two batches of a schedule III narcotic controlled substance (buprenorphine) are being imported from the United Kingdom.

- PG01:
 - o PGA Line Number
 - Government Agency Code ("DEA")
 - o Government Agency Program Code ("DEA")
 - Electronic Image Submitted (No longer required by the DEA, leave blank)
 - o Confidential Information Indicator ("Y")
 - PG02P: No additional data required
- PG06:
 - Source Type Code ("CSH")
 - Country Code ("GB")
- PG14:
 - LPCO Transaction Type ("1")
 - LPCO Number ("FU77R3A")
- PG19 (#1):
 - Entity Role Code ("LAP")
 - o Entity Identification Code ("164"); this is an optional entry
 - Entity Number ("RD0445355"). This number is the registration or company identification number of the U.S. LPCO Authorized Party
- PG22: Document Identifier ("911")
- PG30:
 - Inspection/Laboratory Testing Status ("A")
 - o Arrival date ("10122015")
- PG02C (#1):
 - o Product Code Qualifier ("CSA"); this is an optional entry
 - o Product Code Number ("9064")

- PG04 (#1):
 - o Quantity of Constituent Element ("000004650000"). This quantity (46,500.00) is the base weight of the component
 - o The Unit of Measure ("G")
- PG02C (#2):
 - o Product Code Qualifier ("CSA"); this is an optional entry
 - o Product Code Number ("9064")
- PG04 (#2):
 - o Quantity of Constituent Element ("000001209000"). This quantity (12,090.00) is the base weight of the component
 - o The Unit of Measure ("G")



U.S. Department of Justice Drug Enforcement Administration

PERMIT TO IMPORT



	FISSUE PTEMBER 19, 2014		EXPIRATION DATE DECEMBER 31, 2014				
MPORT	U.S. IMPORTER 100 PINE STREET ARLINGTON, VA 22202	·					
ONSIG							
	FIMPORT LADELPHIA, PENNSYLVANIA		FOREIGN PORT OF EXPO		ED KINGDOM		
nport	er is hereby permitted under the pro	vision of the Controlle	d Substance Import an	d Export Act to	o import items below.		
m No.	Number and Size of Packages	Name of Sub	stance or Preparation	Con	trolled Substances Content		
1	2 CONTAINERS 25,000 GRAMS/CONTAINER	BUPRENORPHINE	HYDROCHLORIDE	50,000 GM (48,500 GM	I BUPRENORPHINE HCL II BASE)		
2	1 CONTAINER 13,000 GRAMS/CONTAINER	BUPRENORPHINE	HYDROCHLORIDE	13,000 GM (12,090 GM	I BUPRENORPHINE HCL M BASE)		
	****	NOTHI	NG FOLLOWS		****		
	lumber of Items TWO	ted is required for le	gitimate purposes.				
OTES							
ndor	sement by U.S. Customs (Original) This is to	o certify that the controlled a t than permitted, please India	substance merchandise descri cate in Notes section above.	bed herein was im	ported into this port. If quantity is		
	(Port)	_	(8ignature/Title)		(Date)		
hief	Administrator:		-	D Ir 8	ddress: Orug Enforcement Administrati mport/Export Unit (ODGI) 701 Morrissette Drive		
	rm 35 (10/10)	181	nature)		Springfield, VA 22152		