



**U. S. Department of Justice**  
**Drug Enforcement Administration**

8701 Morrisette Drive  
Springfield, Virginia 22152

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*www.dea.gov*

6-8-2022

DEA Registered List 1 Chemical Importers

Dear Registrant,

It has come to the Drug Enforcement Administration's (DEA) attention that some chemical import brokers who were granted a DEA registration as chemical importers may be using business practices that fail to comply with DEA regulations. In addition, DEA is concerned that some pending chemical importer applicants, and some current chemical importer registrants pending renewal, may be using a business model that is not in compliance with DEA regulations. This letter serves to advise registrants of DEA's policy with respect to how the agency intends to apply the relevant regulation.

The pertinent regulation is [21 CFR 1313.14, which](#) provides that "for list I chemicals, the final destination of the import transaction must only be the registered location of the importer (*i.e.*, drop shipments are prohibited)." DEA interprets this regulation to require that all imported list I chemicals be delivered at a chemical importer's registered location prior to distribution. Accordingly, if a DEA-registered chemical importer allows shipments of list I chemicals to go directly from the port to a customer it is not in compliance with the requirements of [21 CFR 1313.14](#) because such drop shipments of list I chemicals are prohibited.

DEA is reviewing all new list I chemical importer applications for registration to ensure that the applicant's business model includes compliance with [21 CFR 1313.14](#). For any applicants whose business model would include prohibited drop shipments as described above, DEA may take administrative action to seek to deny the application for registration, unless the applicant changes their business model to comply with the regulation (*i.e.*, that the final destination of any import transaction for list I chemicals will be the applicant's proposed registered location).

DEA will also review the business practices of currently registered list I chemical importers regarding their compliance with the requirements of [21 CFR 1313.14](#). If DEA identifies a registrant whose business practices are not in compliance with [21 CFR 1313.14](#), as discussed above, DEA will ask the registrant to comply with the regulation (*i.e.*, by ensuring that the final destination of any import transaction for list I chemicals will be the registrant's registered location), or to voluntarily surrender their DEA registration. If the registrant refuses to change its business practices to preclude drop shipments, DEA may take administrative action to seek to revoke that list I chemical importer's DEA registration. Decisions on whether to take such administrative action against individual registrants, and applicants for registration, will be made on a case-by-case basis, and will be guided by the statutory criteria set forth in the Controlled Substances Act, and applicable regulations.

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public

regarding existing requirements under the law or Department policies.

For more information regarding DEA's Diversion Control Division, please visit [www.DEAdiversion.usdoj.gov](http://www.DEAdiversion.usdoj.gov). If you have any additional questions on this issue, please contact the Diversion Control Chemical Section at 571-362-3352 or email them at [DOC@dea.gov](mailto:DOC@dea.gov).

Sincerely,

Thomas W. Prevoznik  
Deputy Assistant Administrator  
Diversion Control Division

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