

1. PEG wrong delivery

TCC ordered 500 metric tons of PEG (Polyethylene glycol, CAS registration number 25322-68) with Sentinel Chemicals Ltd. in the UK. Terms & conditions as usual. TCC and Sentinel are doing business for decades already. This time however, TCC received TPEG instead of PEG. TPEG (Polytetrahydrofuran polyethylene glycol) is a block co-polymer of poly 1,4-Butanediol and PEG. And it is export controlled under the so-called dual-use export controls, stemming from the Missile Technology Control Regime.

Apparently, this particular shipment has escaped both UK HM Revenue & Customs' and UK Export Control Office's attention. Now you have to deal with it. You decide to ship it back to Sentinel Chemicals and you call them up to inform them and request immediate delivery of the 500 metric tons of proper PEG.

Sentinel Chemicals informs you that they are very sorry to have upset your operations and request return shipment and emphasize the necessity of an export license application with your national export control office. They also stress that your export control office may want to discuss this shipment and the lack of a previous UK export license with the UK Export Control Office and/or that Sentinel Chemical may feel pressed to do so. Outcome might be that no further shipments of PEG can take place until this matter is solved.....

What do you do?

2. PEG + 1,4 Butanediol

Your wholesale department receives an inquiry for delivery of 200 tons of PEG. This is not an unusual transaction for TCC and the customer. TCC always has enough supply and the wholesale customer can't wait for shipping from the UK to take place.

This time, the wholesale customer asks you if you can perhaps also ship 20 tons of 1,4 butanediol, a solvent frequently used in the industry (CAS registration number 110-63-4). As you are not certain that TCC would have a supply of 1,4 butanediol, you ask the warehouse manager. He looks at you a bit scornfully, cackles and sends you off. Agitated, you ask him what and why... He tells you that a) 1,4 butanediol is a class C controlled substance in the UK and in many other jurisdictions it is considered either a precursor for drugs or a drug itself. 1,4 butanediol, so he tells you, is also used as a recreational drug known by some users as "One Comma Four", "Liquid Fantasy", "One Four Bee" or "One Four B-D-O". It exerts effects similar to γ -hydroxybutyrate (GHB), which is a metabolic product of 1,4-Butanediol. Misuse has also resulted in addiction and death, when mixed with other drugs..... Also, almost half of it is dehydrated to *tetrahydrofuran* to make fibers such as Spandex.

But, even more important: 1,4 butanediol is one of the constituents of TPEG! (*polytetrahydrofuran* polyethylene glycol: a block co-polymer of (poly) 1,4 butanediol and polyethylene glycol (PEG).

What do you do?

3. **Hydrogen Peroxide – high quantity of products**

A wholesale customer of TCC want to procure a small quantity of hydrogen peroxide (CAS registration number 7722-84-1). No problem, TCC does have very large supplies of H₂O₂ and you are happy to oblige. After a month or so, the customer comes back to you and ask for another delivery, now 50 tons please. And, could it preferably be a high concentrate, higher than last delivery. Would you perhaps have something like 80 -90%? Well, yes. You will order it and ship it to them. They are quite satisfied with your handling and they order another 100 tons. You feel a bit awkward about them ordering so large quantities that just don't fit their business profile. You Google Hydrogen Peroxide and you find the following:

Communities Against Terrorism **Potential Indicators of Terrorist Activities** **Related to Peroxide-Based Explosives**

What do you do?

4. **Anti-dandruff shampoo – registration**

TCC sells tons and tons of shampoo on an annual basis. 20% of the sales concern The Cool Connection Pristine Shoulders anti-dandruff shampoo. This shampoo contains zinc pyrithione (CAS registration number 13463-41-7) as the active agent. One of your largest buyers is in Brazil. Now, Brazil has recently changed its laws and regulations on registration on (potentially) hazardous and/or medicinal products. The Brazilian Food & Drug Administration "Anvisa" has recently promulgated its regulations on treatment against dandruff, seborrheic dermatitis and other medical applications including treatments of psoriasis, eczema, ringworm, fungus, athlete's foot, dry skin, atopic dermatitis, tinea, and vitiligo.

The case is that Anvisa changes the registration criterion from category X to category Y, and also stipulates that, until you meet the new criterion and registration requirements, you will not sell, procure to sell, or deliver any Pristine Shoulders in or to customers in Brazil and neither will you sell, procure to sell and/or deliver any zinc pyrithione to customers in Brazil.

You still have 160 pallets of Ombros Belas shampoo for the Brazilian market, meeting former registration requirements. All the flasks or "frascos de xampu" are labeled in the Portuguese language.....

What do you do?

