STATUS DECISION OF CONTROLLED AND NON-CONTROLLED SUBSTANCE(S)

Substance:  
I - N-(2,2,2-Trichloroethoxy)carbonyl] Bisnortilidine  
II – N-(2,2,2-Trichloroethoxy)carbonyl] Nortilidine

Based on the current information available to the Office of Controlled Substances, it appears that the above substance is:

Controlled ☐  
Not Controlled ✓

under the schedules of the Controlled Drugs and Substances Act (CDSA) for the following reason(s):

• The substances are not salts or derivatives of tilidine and therefore are not included under item 17 of Schedule I to the CDSA.

Prepared by: ________________________________ Date: ________________
Evelyn C Soo

Verified by: ________________________________ Date: ________________
Mark Kozlowski

Approved by: ________________________________ Date: ________________  
DIRECTOR, OFFICE OF CONTROLLED SUBSTANCES

This status was requested by: “third party information removed as per agreement with applicant”
Drug Status Report

**Drug:**
I - N-(2,2,2-Trichloroethoxy)carbonyl] Bisnortilidine  
II – N-(2,2,2-Trichloroethoxy)carbonyl] Nortilidine

**Drug Name Status:**
I - N-(2,2,2-Trichloroethoxy)carbonyl] Bisnortilidine  
II – N-(2,2,2-Trichloroethoxy)carbonyl] Nortilidine are the common names.

**Chemical Name:**

**Chemical structure:**

![Chemical structure of I and II]

**Molecular Formula:** I - C$_{18}$H$_{20}$Cl$_3$NO$_4$,  II - C$_{19}$H$_{22}$N$_3$O$_4$

**CAS-RN:** I – 71616-76-7;  II – 1246820-72-3

**Pharmacological class / Application:** Pharmaceutical intermediates

**International status:**

US: N-(2,2,2-Trichloroethoxy)carbonyl] Bisnortilidine and N-(2,2,2-Trichloroethoxy)carbonyl] Nortilidine are not listed specifically in the Schedules to the US *Controlled Substances Act* and are not mentioned anywhere on the DEA website.

United Nations: The substances are not listed on the Yellow List - List of Narcotic Drugs under International Control, the Green List - List of Psychotropic Substances under International Control, nor the Red List - List of Precurors and Chemicals Frequently Used in the Illicit Manufacture of Narcotic Drugs and Psychotropic Substances under International Control.
Canadian Status:  N-(2,2,2-Trichloroethoxy)carbonyl] Bisnortilidine and N-(2,2,2-Trichloroethoxy)carbonyl] Nortilidine are not listed specifically in the schedules to the CDSA. The substances are intermediates in the synthesis of bisnortilidine and nortilidine, respectively. Tilidine is currently listed as item 17 in Schedule I to the CDSA as “Tilidine (ethyl2–(dimethylamino)–1–phenyl–3–cyclohexene–1–carboxylate), its salts, derivatives and salts of derivatives”. As the substances are not impurities nor derivatives of tilidine, they cannot be included under item 17 of Schedule I to the CDSA.

Recommendation:  N-(2,2,2-Trichloroethoxy)carbonyl] Bisnortilidine and N-(2,2,2-Trichloroethoxy)carbonyl] Nortilidine are not included under item 17 of Schedule I to the CDSA and are controlled substances.

Date:  August 30th, 2012.