

7th February 2020

To Whom It May Concern:

Re: Proposed amendments to the scheduling of Pentobarbital (CAS Number 76-74-4)

AMRRIC is a national not-for-profit, non-government organisation the coordinates veterinary and animal-focused education programs in rural and remote Indigenous communities nationally. Our programs focus on companion animal population health and management, in order to improve the health and wellbeing of both animals and people.

In order to deliver veterinary services to remote communities, AMRRIC has registered veterinarians on-staff, and partners with a wide variety of external veterinarians – both from private clinical practice and universities. While not used as a form of population control, euthanasia of intractably ill or injured animals is still necessary in the course of our work. Pentobarbital is of course, the drug that most veterinarians - including those affiliated with AMRRIC - use to perform euthanasia of animals.

The facilities available to veterinary service providers in remote Indigenous communities are extremely limited. In most instances, there is no dedicated vet clinic in which the veterinary team can operate. Instead, the veterinary teams must be entirely self-sufficient, transporting all of their necessary medicines and equipment with them, in order to establish field hospitals in each location. Transport to remote communities is variable, with some veterinary teams travelling using their own vehicle, while other fly in and borrow vehicles from local organisations.

Because of its potential to be misused, AMRRIC already requires that when working remotely, our partner veterinarians store Pentobarbital in a locked container, kept on their persons at all times. Where a vehicle safe is available, AMRRIC recommends that during transport, and while the vehicle is in their vicinity, veterinary partners utilise the vehicle safe for Pentobarbital storage. If the veterinary team have flown in however, this option is typically precluded, as local organisations do not routinely fit safes to their vehicles.

In AMRRIC's experience, veterinarians are well aware of the potential for Pentobarbital to be misused, and are thus very cautious in its storage and handling. While we do require our veterinary partners to store Pentobarbital securely, AMRRIC believes that the current S4 scheduling of Pentobarbital is appropriate and does not require review. Rescheduling Pentobarbital to an S8 will result in additional workload in terms of record-keeping, and additional costs to ensure storage compliance. Should Pentobarbital be rescheduled, AMRRIC strongly advocates that the storage requirements need to be achievable,

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considering both the limited availability of infrastructure in remote locations, as well as the paucity of funds to support remote community veterinary services (and by association, infrastructure required to ensure storage compliance).

Sincerely,

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