

10 January 2020

Adjunct Professor Paul Brent  
Chair  
Advisory Committee on Medicines Scheduling  
Therapeutic Goods Administration  
PO Box 100  
Woden ACT 2606

Dear Sir

**Proposed amendments to the poisons standards (medicines)  
Proposed rescheduling of pentobarbital**

The Veterinary Practitioners Board (Board) is grateful for the opportunity to provide a submission to this proposal.

Aligned with the opinion of the [South Australian Coroner](#) and the [Coroners Court of Queensland](#) the Board supports the proposal to reschedule the injectable form of pentobarbital from schedule 4 appendix D to schedule 8.

The Board is of the opinion that this is an important step in changing the culture of veterinary practice to more appropriately reflect the significant health and safety risks associated with the storage and use of this drug. [In May 2015](#) and in more recent editions of its publication BoardTalk, the Board has strongly recommended to the profession that euthanasia solution (pentobarbital injection) be managed in accordance with the requirements of a schedule 8 drug.

Based on reports from our hospital inspection program the overwhelming majority of hospitals in NSW are now storing euthanasia solution in a safe.

The Board appreciates that the high incidence of suicide within the veterinary profession has many causes which need to be addressed and that this single change will not solve this problem. The rescheduling of pentobarbital injection and resultant increased security surrounding its use in veterinary practice will reduce the availability of this drug to non-veterinary staff, change the culture within veterinary practices regarding its use, and form an important component of a more comprehensive strategy to address this tragedy.

Yours faithfully



John Baguley  
**Registrar**

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