

Drugs, Poisons & Controlled Substances Regulations Review

**Submission from the Australian Veterinary Association
(Victorian Division)**



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The AVA

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 9500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock and wildlife. Government veterinarians work with animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We also have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

The Review

The AVA has considered the proposed Drugs, Poisons and Controlled Substances (DPSC) Regulations 2017 and whilst we are in general support of the proposals, we wish to make the following observations and comments:

- There is no special requirement for storage or for reporting Pentobarbitone (Lethabarb) as being stolen other than for other S4s. Whilst we do not support it being reclassified as an S8, we do support legislation ensuring that it is appropriately stored. Under these proposed regulations, it could not be stored in the same drug safe as the S8s (according to Clause 74)
- We would like to see the inclusion of a clear statement that it is prohibited for medical practitioners to prescribe for animals and vice-versa – for veterinarians to prescribe for humans. We would also like an inclusion that pharmacists must not fill scripts from doctors where the patient is obviously an animal
- We are very supportive of the provision to move to electronic storage and recording of S8s
- In regard to possessing/administering drugs, human general medical nurses are covered under Clause 23. Is it the intention that a veterinary nurse is regarded as “*a person having custody or care of an animal*” that the veterinarian has prescribed the drug for?
- The provision to move to electronic storage and recording of Schedule 8 drugs is welcomed
- There is no mention of storage requirements/obligations for farmers that have been prescribed Schedule 4 medications by veterinarians. We feel this should be included
- Veterinarians and farm end users are excluded from the requirements relating to the use of prostaglandins. We believe both these excluded professions should have requirements to adhere to also

- Livestock veterinarians feel the 3 month expiry on requirement for prescriptions is not practical and would not present a risk to human or animal health if extended to 6 months.
- Livestock veterinarians have also indicated that the requirement of including the age of livestock animals is not warranted. Sometimes the age is not known and the age would not impact on the dose of prescription
- We would be supportive of livestock producers being required to document treatments and record the electronic identification on their animal receiving treatment
- We have a strong view that investigation and enforcement of the DPSC Regulations in regard to animal related cases is unsatisfactory. Drug situations involving veterinary drugs seem to only feature on the Department of Health's radar if humans are affected. It is viewed that a risk to animals is not something they pursue or investigate unless there is a risk to humans - even when it is illegal. The AVA's view is that the powers of investigation on breaches of DPSC Regulations in regard to veterinary drugs, is shifted to the Chief Veterinary Officer of Victoria's department and that it is appropriately resourced so that prosecutions are made.