



# **The Australian Veterinary Association**

**Submission to the National Pharmaceutical Drug Misuse Strategy (NPDMS)**

**3 August 2011**

## **Executive summary**

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Its 6300 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, such as cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

Our members support the National Pharmaceutical Drug Misuse Strategy (NPDMS) but are concerned that any restrictions introduced do not impact on their ability to have access to drugs that have the potential to improve the welfare outcomes of their patients. By restricting some medications to the National PBS scheme, veterinary prescriptions will not be recognised and access to medications may become extremely difficult.

Alprazolam is one such medication which has the potential to revolutionise treatment of behaviour disorders and also aid anaesthetic recovery. To unduly restrict veterinarians access to this medication would have a significant adverse impact the health and welfare of a large number of animals.

The AVA is very interested and available to provide further information or clarification at any time.

## **Key Areas of Concern**

- Alprazolam, a benzodiazepine, is a valuable drug in both small and large animal veterinary practice.
- Alprazolam has both retrograde and anterograde amnesic effects which are valuable in preventing patients from recalling stressful procedures in normal veterinary practice. This has the potential to reduce subsequent fear of veterinary premises, and reduce defensive aggression brought on by this anxiety.
- Alprazolam is also an extremely valuable medication for thunderstorm and fireworks anxiety/panic attacks.
- Research is currently being done to determine the full value of this medication.
- Veterinary practices maintain excellent clinical records and also S8 drug registers so as to demonstrate traceability to the individual patient.
- S4 and S8 medications have specific storage and containment requirements which remain a prerequisite for practice registration. They are subject to random audit of these requirements by health department inspectors.

- It is recognised that alprazolam is one of the most stolen drugs for illicit use and veterinarians recognise that access and secure storage of this medication is vital.
- Veterinary scripts will not be accepted through the PBS so the AVA would recommend not implementing this restriction.
- It is important to prevent veterinary (Doctor) shopping. To dispense S4 medications, a veterinarian legally needs to have established a client – veterinarian – patient relationship and has examined the patient within the last 12 months at least. They need to have confidence in the client being able to use any dispensed medications correctly. To prevent abuse or multiple visits to various veterinary hospitals, it is possible to record the animals microchip registration number and client details and have these recorded in a central database. This could operate in a similar system to the one established for pseudoephedrine.

## **Recommendations**

**Recommendation 1:** Ensure any introduced restriction of access to alprazolam does not prevent veterinarians from using this valuable drug in their day to day practices.

**Recommendation 2:** Recognise that veterinary practices already have controlled access to S4 and S8 medications and have demonstrated maintenance of treatment registers and secure storage areas.

**Recommendation 3:** Consider using a dispensing database similar to the existing pseudoephedrine registers to link microchip identification with client details to prevent doctor or veterinarian shopping.

**Recommendation 4:** Do not use the PBS system to inadvertently reduce access to alprazolam by veterinarians.

**Recommendation 5:** Further veterinary research is currently underway and interim reports support the continued use of this valuable medication in veterinary practice. Continued veterinary use has extremely positive welfare benefits for the well being of our patients and should be supported.

**Recommendation 6:** Ensure that veterinarians are able to receive training and education in recognising signs of misuse and abuse of medications by clientele.

## **Summary**

The AVA supports the development of the NPDMS and is grateful to be able to make this late submission.

Our members have for many years demonstrated a broad understanding of the privileges that come with prescribing and dispensing pharmaceuticals and have been regulated by the various state and territory health departments. AVA members operate under the AVA Code

of Professional Conduct which ensures a high level of professionalism, responsibility and accountability.

The above recommendations are made to assist in tackling the misuse and abuse of medications in the Australian community and propose ways forward to alleviate these problems, without compromising the treatment and welfare outcomes of our patients.

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