



**DEPARTMENT of HEALTH
and HUMAN SERVICES**

*Community, Population & Rural Health
Public and Environmental Health Service
Pharmaceutical Services Branch*

PSB 1071
Enquires: 03 6233 2064
Fax: 03 6233 3904
Email john.galloway@dhhs.tas.gov.au

29th March 2006

Newsletter No 38

**Pseudoephedrine
Scheduling, recording of sales and criminal activity**

As a working principle, government policy requires the implementation of the minimum level of regulation which will achieve the required objective. In the case of pseudoephedrine, those involved in criminal activities have gradually increased their efforts and methods to obtain supplies of the drug. Consequently, the regulatory response has required a series of changes to progressively tighten controls. Possible further restrictions in future cannot be ruled out and are essentially dependent on the effectiveness of the measures introduced so far.

1. Pseudoephedrine scheduling – Schedule 3 pack size limitation

As previously advised, the National Drugs and Poisons Scheduling Committee (NDPSC) has recommended further scheduling amendments which will take effect on 1st April 2006. This step was delayed until this date so as to strike a balance in providing all stakeholders with additional time to meet the requirements whilst ensuring that the real public health concerns regarding the illicit diversion of pseudoephedrine are addressed as soon as possible.

The amendment is:

Schedule 3 – Amendment effective 1st April 2006

PSEUDOEPHEDRINE (other than preparations for stimulant, appetite suppression or weight-control purposes) when supplied in a primary pack:

- (a) in liquid preparations containing 800 mg or less of pseudoephedrine hydrochloride (or its equivalent); or
- (b) in other preparations containing 720 mg or less of pseudoephedrine hydrochloride (or its equivalent).

For example: A pack containing 12 tablets, 60 mg of pseudoephedrine per tablet, is classified in Schedule 3

Please Note: **Any products not meeting the Schedule 3 criteria will be included in Schedule 4.**

All pseudoephedrine products are required to be stored in the dispensary or pharmacy storeroom.

The NDPSC maintained pseudoephedrine in Appendix H, a listing that permits general advertising of Schedule 3 products. The committee agreed that retaining direct-to-consumer advertising of pseudoephedrine products should ensure consumers' awareness of the scheduling changes and the need for the pharmacist to be involved in the sale. Advertising itself should not stimulate diversion for illicit use.

2. Recording of Sales

Tasmania police advise that, in addition to previously recognised high risk products, pseudoephedrine/analgesic products are now also being targeted. Previously single active and certain combination products were considered high risk. Studies in forensic laboratories show that pseudoephedrine may be extracted from all products and employed in a "cook". In addition there has evolved strong financial incentives to criminals to manufacture methylamphetamine from whatever pseudoephedrine source that can be accessed. Some mainland clandestine laboratories have moved to the use of mixtures.

Recording of the supply of all pseudoephedrine products should be made in all cases except where the pharmacist is sure that the purchaser is a person of good character (eg purchaser may be a bona fide regular local, account or prescription customer).

Records should be kept in a format that is readily retrievable i.e. a computer or bound book. As with the supply of any Schedule 3 substance, the pharmacist must form the opinion that the use of that substance in the treatment of the patient is therapeutically justified.

3. Criminal activity

Tasmania Police has advised of an attempt to intimidate a pharmacist in respect of the restrictions that are being placed on supply of pseudoephedrine. Any attempts at intimidation should be reported to Crimestoppers on 1800 005 555 without delay. These reports are forwarded promptly to Drug Investigation Services. If there is any immediate personal threat the police switchboard should be contacted on 6230 2111 (all areas).

As previously advised, pharmacists should take other steps to minimise the risk of criminal activity:

- Pseudoephedrine product stock levels to be minimised.
- Products (where possible) to be kept out of general public sight

Please contact the Branch on 62 33 2064 if you have any queries.

John Galloway
Chief Pharmacist

