

DRUG CONTROLS- LEGAL OBLIGATIONS ON VETERINARY SURGEONS

Pharmaceutical Services Branch at the Department of Health and Human Services has recently conducted a number of audits of veterinary surgeries under the Poisons Act and Regulations. There has been an increased use of narcotic substances in animal treatment and this presents increased public health risks as veterinary surgeries become a target for those seeking drugs. The diversion of these drugs to the illicit market may potentially cause a significant increase in morbidity and mortality in illicit drug users.

During the audit specific attention was given to the maintenance of narcotic registers and the storage of narcotic and Schedule 4 drugs. It is apparent that a significant number of veterinary practices need to make improvements to meet well established legal standards for the recording, storage and security applying to narcotic substances. Accordingly it is strongly recommended that each veterinary practitioner review his or her practice arrangements in regard to the following matters:

In summary veterinary surgeons are obliged to:

Use an approved register for narcotic substances.

Record all narcotic substances movements in the register.

Ensure the security of narcotic substances and Schedule 4 drugs when received, stored and transported.

Store narcotic drugs in an enclosure meeting the minimum storage requirements.

Ensure that there is appropriate security for Schedule 4 and an increased level of security for Schedule 4 Declared drugs.

Schedule 8 (narcotic) substances

An approved register

- A narcotic register must be maintained for each narcotic safe and it must be of an approved type. (*A list of some suppliers of approved registers is given - see note 1*).

Recording

- Incoming stock is to be signed into the register by a veterinary surgeon.
- All outgoings to be signed out of the register by a veterinary surgeon.
- A balance figure must be maintained in the register and verified against the stockholding on a regular basis.
- When there are transfers of stock made to other surgeries or safes there must be corresponding entry made in the registers for the respective safes.
- A record must be maintained for any returns of narcotic substances to suppliers; this would include retaining of confirmation from the supplier e.g. a credit note.

- Regulation 13 (10) of the Tasmanian Poisons Regulations 2002 requires that "Each entry in a narcotic substances register shall be made as soon as practicable after the occurrence of the event to which it relates and, in any event, not later than 48 hours after the occurrence of that event".

Narcotic security

- Purchasing of Schedule 8 substances must be at the direction of the veterinary surgeon.
- Incoming stock from supplier is to be received by the veterinary surgeon and verified against the order or invoice.
- The quantities held should be minimised.

The Narcotic Enclosure

- Regulation 24 in part states that a veterinary surgeon "shall keep narcotic substances apart from other goods in an enclosure that is constructed and secured in a manner approved by the Secretary and when the narcotic substance is not being used keep the enclosure locked and retain the key thereof either on his or her person or in a place not readily accessible to other persons". Please note that "other goods" in this regulation does not include money, cheques or Schedule 4 Declared substances
- The standard of safe is to be appropriate for the quantity of stock held. A lockable wooden enclosure is permitted for up to and including 20 doses. At above 20 doses a "Level 2" steel enclosure is required and this must be attached to a masonry floor or wall (*see note 2*). A "Level 2" safe may hold up to 50 doses. Where a "Level 2" safe is in a room with a movement sensor connected to a fulltime monitoring service, the safe may hold up to 200 doses. Where more than 200 doses are held, please contact this Branch for details of requirements.
- The term "doses" is used in the specification of minimum storage requirements. As the specification is made for the purposes of protecting human public health the doses are those normally used for human adult dosing. For the purposes of determining storage requirements examples of a "dose" are given below:

Butorphanol	4mg (<i>a 10ml vial of 10mg/ml represents 25 doses</i>)
Codeine	30mg
Fentanyl	100mcg for injection or one transdermal patch
Morphine	One ampoule or 10mg when in a multi-dose vial
Pethidine	One ampoule or 50mg when in a multi-dose vial (<i>a 50ml vial of 50mg/ml pethidine represents 50 doses</i>)

Carriage of drugs for emergency purposes

- The carriage of drugs is allowed for emergency purposes. Regulation 24 states in part that "a veterinary surgeon may, for emergency purposes, keep narcotic substances in a bag in a vehicle or room which is kept securely locked when the vehicle or room is not occupied by that veterinary surgeon." The quantity of drugs carried should be kept to a minimum and returned to an approved safe when at the veterinary surgery.

Fentanyl transdermal patches (Durogesic)

There are public health concerns regarding the proper disposal of the patches as they contain a residual reservoir of the active drug after application for three days. There has been a death and a near death incident occur in Tasmania due to the misuse of the patches. Pharmaceutical Services Branch recommends that the patch is removed and disposed of by a veterinary surgeon and that clients are directed not to undertake the removal. Please advise Pharmaceutical Services Branch of any suspicious circumstances relating to unauthorised removal of patches.

Schedule 4 and Schedule 4 Declared Drugs (S4D)

Schedule 4 security

- Purchase orders for Schedule 2,3 and 4 drugs to be at the direction of the veterinary surgeon
- Incoming stock from supplier to be received by the veterinary surgeon and verified against order or invoice
- Poisons Regulation 38 requires that a "veterinary surgeon who sells or supplies any substance specified in Schedule 3 or 4 to the Poisons List must keep it in either of the following so that the public does not have access to the substance:

- (A) a store-room; or
- (B) the dispensary."

Storage of Schedule 4 Declared drugs

It is recommended that Schedule 4 Declared drugs (includes benzodiazepines and anabolic steroids) be held under lock and key when not in use. The Branch recommends that barbiturate preparations including phenobarbitone and the pentobarbitone preparation, "Lethabarb", are stored similarly.

Mary Sharpe,
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Notes:

1. Suppliers of approved narcotic substances registers

The red "Narcotic Substances Register" is a 100 page A4 sized hard cover register. The price is approximately \$70).

It is available from:

Print Applied Technology Ph: 6233 3168

Sigma

Symbion

There is also a soft cover 24 page pocket sized register.

It is available from:

**Royal Australian College of General Practitioners Ph 1800 331 626 [or
alternatively (03) 86990508 or (03)86990495]**

- Minimum order of 2 (Price \$5.50 each)

2. Specification for a "level 2" enclosure

The enclosure is to be "constructed of black mild steel plate not less than 9.5mm thick, continuous welding of all edges. Flush fitting door with clearance around door of not more than 1.5mm. 5 lever lock or equivalent with key retaining feature. Securely attached to brick or concrete wall or floor by four 10mm expanding bolts (or equivalent attachment to substantial wall or floor)."