



VETERINARY SURGEONS BOARD OF SOUTH AUSTRALIA

GUIDANCE NOTE

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Re: Recommendations re: Storage of Euthanasia Solution and Record Keeping

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National statistics regarding the number of people who have committed suicide through the use of euthanasia solution, Pentobarbitone, are deeply concerning. On average, there have been 18 suicides per year since July 2000 as a result of Pentobarbitone. For some of these tragic deaths, Pentobarbitone has been sourced directly from veterinary clinics.

Of the suicides, many of the deceased are veterinary surgeons or veterinary nurses. However, there are also people who have sourced Pentobarbitone from a veterinary clinic whom you would not expect to have ready access to the drug such as non-veterinary staff and students of veterinary science.

The Queensland Coroner recently considered the matter of unauthorised access to Pentobarbitone in an Inquest into the death of Ms Donna Cowley-Persch. Ms Cowley-Persch was employed by a veterinary clinic as a dog groomer at the time of her death. Tragically, she died by suicide at her work premises as a result of using Pentobarbitone.

The regulations in Queensland for Pentobarbitone are comparable to those in South Australia.

Pentobarbitone is currently scheduled by the Therapeutic Goods Administration (TGA) as a Schedule 4 drug (prescription only medicine). This means that under regulation 27 of the *Controlled Substances (Poisons) Regulations 2011 (SA)*, Pentobarbitone must be stored *to prevent public access*.

In contrast, a Schedule 8 drug (controlled drug or drug of dependence) must be stored *to prevent unauthorised access*. This requires the drug to be stored in a locked cabinet, and if there are more than 15 doses, the drug must be stored in a metal safe unless supervised at all times.

Given the findings of the Queensland Coroner and the known prevalence of the misuse of Pentobarbitone in veterinary clinics, the Veterinary Surgeons Board of South Australia (the Board) strongly recommends that Pentobarbitone be stored in the following manner:

- Pentobarbitone should be stored in a locked facility affixed to the floor or wall of a building or affixed to the chassis of a vehicle and providing no less security than a 10 mm thick metal safe



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- The storage facility should remain locked, to prevent access to unauthorised persons, at all times except when it is necessary to open it to carry out a procedure
- Keys and combinations to the storage facility should not be accessible to or known by unauthorised persons (e.g. staff other than veterinary surgeons)
- When transported for use in another location, Pentobarbitone should be stored in a locked receptacle (e.g. a medical bag) in the veterinary surgeon's immediate possession
 - If the receptacle is necessarily out of the veterinary surgeon's immediate possession for a brief period of time, it should be secured, out of sight and in a lockable facility (e.g. lockable vehicle or cupboard) to prevent unauthorised access

Further, the Board strongly recommends that the record keeping requirements applicable to Schedule 8 drugs, as required by the *Controlled Substances (Poisons) Regulations 2011*, be adopted by all veterinary surgeons in respect of Pentobarbitone. This includes maintenance of a drug register which records all transactions with respect to the drug.

For information on your obligations as a veterinary surgeon under the *Controlled Substances Act 1984* and the *Controlled Substances (Poisons) Regulations 2011*, you can visit SA Health's Drugs of Dependence Unit website: www.sahealth.gov.au.

Owners and managers of veterinary clinics may wish to seek private legal advice in relation to complying with work health and safety obligations in relation to the storage of Pentobarbitone.