RESOLUTION NUMBER: 8 and 27 Combined  APPROVED

SOURCE: COMMITTEE ON PHARMACEUTICALS
COMMITTEE ON ANIMAL WELFARE

SUBJECT MATTER: Protecting Veterinarians’ Access to Ketamine

BACKGROUND INFORMATION:

Ketamine is widely used for animal immobilization, sedation and pain management in veterinary medicine around the world. Access to ketamine is essential, because it is the only injectable anesthetic agent that is safe and well-tested in the full range of species that veterinarians must treat, including both large and small domestic animals and wildlife.

Concerns have been expressed about the diversion and illicit use of ketamine; however, in the United States, ketamine is currently a Schedule III drug under the Controlled Substances Act, and strict regulations are in place to help prevent its illegal use. Ketamine is not currently controlled internationally under either the Psychotropic Convention or the Single Convention on Narcotic Drugs.

The World Health Organization (WHO) Expert Committee on Drug Dependence reviewed ketamine at its 34th, 35th, and 36th meetings, and plans to review ketamine again, along with a number of other drugs, during its upcoming 37th meeting in Geneva on November 16-20, 2015. The November review relates to a revised proposal pending before the United Nations (UN) Commission on Narcotic Drugs to control ketamine under Schedule IV of the 1971 Psychotropic Convention. On March 13, 2015, the UN Commission on Narcotic Drugs decided by consensus to postpone consideration of this proposal and to request additional information from the WHO. The original proposal brought to the March meeting by China was to place ketamine in Schedule I. On October 5, 2015, via the Federal Register, the Food and Drug Administration (FDA) issued a request for comments regarding the abuse potential, actual abuse, medical usefulness, trafficking and impact of schedule changes on the availability of 10 drug substances—including ketamine. Due on October 15, those comments will be considered as FDA prepares a response to the WHO’s Expert Committee on Drug Dependence regarding the abuse liability and diversion of these drugs.

The international scheduling of ketamine has the potential to adversely affect its availability to veterinarians. Accordingly, veterinarians from across the United States have responded to the FDA’s call for comments with examples of ketamine’s use in clinical settings, emergency response, and research. In addition, and in response to the discussions being conducted by the WHO’s Expert Committee on Drug Dependence, the World Veterinary Association and World Small Animal Veterinary Association have issued policy expressing veterinarians’ needs for continued access to ketamine and opposition to increased international control.

The United States Animal Health Association recognizes that veterinarians’ access to anesthetics and analgesics that are pure, safe, potent and efficacious for animals is imperative for quality patient care. This includes ketamine, which is used for animal immobilization, sedation and pain management. In some areas, ketamine is the only analgesic/anesthetic agent available to the veterinary profession and additional restrictions on its use would have a significant negative impact on animal health and welfare on a global scale.
RESOLUTION:

The United States Animal Health Association (USAHA) opposes international and domestic regulatory action, specifically changes in scheduling, that would result in ketamine becoming more difficult, if not impossible, to obtain within the United States by licensed veterinarians for the authorized treatment of animals. The USAHA also requests that the Food and Drug Administration consider this resolution as they develop their comments to the World Health Organization Expert Committee.