



October 15, 2015

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852

RE: [Docket No. FDA-2015-N-0045] for International Drug Scheduling; Convention on Psychotropic Substances; Single Convention on Narcotic Drugs; Ketamine; Phenazepam; Etizolam; 1-cyclohexyl-4-(1,2-diphenylethyl)-piperazine (MT-45); N-(1-Phenethylpiperidin-4-yl)-N-phenylacetamide (Acetylfentanyl); α -Pyrrolidinovalerophenone (α -PVP); 4-Fluoroamphetamine (4-FA); para-Methyl-4-methylaminorex (4,4'-DMAR); para-Methoxymethylamphetamine (PMMA); 2-(ethylamino)-2-(3-methoxyphenyl)-cyclohexanone (Methoxetamine or MXE); Request for Comments

Dear Dr. Hunter:

The American Veterinary Medical Association advocates for continued availability of medicinal products that are pure, safe, potent and efficacious for animals, and contends that access to ketamine is critical for veterinary medicine. In the United States, ketamine is currently a Schedule III drug under the Controlled Substance Act, and strict regulations and safeguards are in place to help prevent its illegal use.

We submit our concerns regarding possible international control of ketamine for review as the Department of Health and Human Services (HHS) develops its recommendations related to ketamine and other substances for consideration by the World Health Organization (WHO) later this fall. We understand that ketamine is not currently controlled internationally under either the Psychotropic Convention or the Single Convention on Narcotic Drugs. We also understand that the WHO Expert Committee on Drug Dependence (ECDD) reviewed ketamine at its 34th, 35th, and 36th meetings and has recommend that ketamine not be placed under international control. The ECDD will review ketamine again, along with a number of other drugs, at its upcoming 37th meeting next month.

Earlier this year, the AVMA became aware and concerned about a proposal to the UN Commission on Narcotic Drugs (CND) to place ketamine in Schedule I of the 1971 UN Convention on Psychotropic Substances. This proposal was amended during the March 2015 CND meeting to place ketamine in Schedule IV of the 1971 Convention. The CND subsequently postponed consideration of this amended proposal to allow for additional information to be gathered from the WHO.

Although the AVMA understands the WHO is currently seeking information pertaining to international regulation of ketamine in Schedule IV of the 1971 Convention, we remain extremely concerned about the potential for ketamine to be placed in a more stringent international schedule (e.g., Schedule I as had been originally proposed to the UN-CND). On the basis of discussions with the U.S. Drug

Enforcement Administration (DEA) earlier this year, our understanding is that scheduling ketamine internationally at a level more stringent than it currently is in U.S. regulations would result in a change in U.S. scheduling to align it with the more stringent international control. We have been more recently advised by the FDA Center for Veterinary Medicine that this interpretation may not be correct and that international scheduling of ketamine at any level would not impact US scheduling of this drug. Because of this ambiguity, the AVMA believes it is essential to continue to convey our concerns with any changes to the regulation of ketamine, internationally or nationally, that would result in this essential drug being less accessible—or even inaccessible—to the veterinary profession.

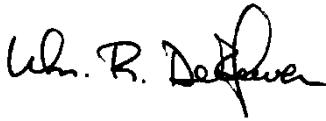
We reiterate that ketamine is a key component of veterinary medical anesthetic and pain management protocols worldwide, and any regulatory action that limits its availability to the veterinary profession would gravely impact animal health and welfare. Ketamine is used for animal immobilization, sedation, and pain management by veterinarians who are members of the AVMA. Real-life examples include, but are not limited to the following:

- **Companion animal medicine**
Ketamine is used by veterinarians in performing needed medical procedures on pets that are experiencing pain or significant discomfort. An AVMA member from Florida shared his experience with a family whose beloved dog required treatment of a particularly problematic ear infection. Because the dog became aggressive when restrained, ketamine was used to safely sedate the dog so that it could be treated without risk of injury to itself or its human handlers. In the veterinarian's own words, "This dog would have been euthanized were it not for the availability of ketamine."
- **Large animal medicine**
Ketamine is important for performing surgical procedures and controlling pain in horses. Among AVMA members responding to our request for information were board-certified large animal surgeons who emphasized that ketamine is an important agent for the induction of anesthesia in surgical patients prior to their receiving inhalant anesthesia. Ketamine provides effective anesthesia for short surgical procedures in horses, and is also effective when used as a continuous-rate infusion to manage pain in patients after surgery.
- **Wildlife management and research**
Ketamine is used to assist in handling a range of wildlife species, such as grizzly bears, wolverines, river otters, wolves, deer and martens. A member in Alaska reported that during one particular 10-day period, she administered ketamine to safely perform a long-distance air transport for translocation of 99 black bears and grizzly bears in Alaska. Based on this veterinarian's experience, use of ketamine was directly responsible for helping to save the lives of these bears because of ketamine's ability to provide safer and longer anesthesia than other agents. Its use also improved safety for the bears' human handlers.

We appreciate the opportunity to voice our concerns through our response to this Federal Register notice and to provide examples of the importance of continued access to ketamine for use in veterinary medicine with appropriate controls to limit misuse.

The AVMA, founded in 1863, is one of the oldest and largest veterinary medical organizations in the world, with more than 86,500 member veterinarians worldwide engaged in a wide variety of professional activities and dedicated to the art and science of veterinary medicine. For further clarification regarding the AVMA's comments, please contact Dr. Lynne White-Shim at (800) 248-2862 ext. 6784 or at lwhite@avma.org.

Respectfully,

A handwritten signature in black ink that reads "W. Ron DeHaven". The signature is written in a cursive style with a large, stylized initial "W".

W. Ron DeHaven, DVM, MBA
Executive Vice President and CEO

LWS/KH/EAS

c: Dr. Bernadette Dunham, Director, FDA Center for Veterinary Medicine