



## Alaska State Veterinary Medical Association

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The Honorable Mike Dunleavy  
Governor of Alaska  
Office of the Governor  
P.O. Box 110001  
Juneau, AK 99811-0001

Dear Governor Dunleavy:

The Alaska State Veterinary Medical Association (AKVMA) and the Alaska Farm Bureau are reaching out to address the emerging public health threat posed by illicit xylazine while preserving veterinary access to this essential prescription animal sedative. The AKVMA represents member veterinarians in the state of Alaska and the Alaska Farm Bureau represents individuals engaged in the agriculture industry in the State of Alaska.

The Alaska State Veterinary Medical Association and the Alaska Farm Bureau recognize the threat of illicit xylazine, which has now been found in all 50 states mixed with fentanyl and other narcotics. This potent drug combination poses grave health and safety risks to human users. Xylazine is not approved for use in humans. Governors in Pennsylvania and Ohio have signed executive orders to schedule xylazine as a Schedule III controlled substance. If this happened in Alaska, it would drastically change the way veterinarians are able to care for their patients, making it an animal welfare and human safety issue. As you can imagine, this is a huge concern for veterinarians and livestock producers.

We are reaching out to inform you of the negative consequences we expect to see if xylazine is scheduled and to emphasize the importance of xylazine in veterinary medicine in Alaska. Xylazine is a non-narcotic veterinary sedative, analgesic, and muscle relaxant that has been approved in the United States for veterinary use since 1972. It is used across veterinary medicine and is especially important when working with large animals, zoo animals, wildlife, and laboratory animals to facilitate safe medical evaluation, treatment, and surgical care.

Sedation of fractious and large animals with xylazine is critical to keeping people and animals safe. This drug is needed for safe cattle handling and when performing procedures such as disbudding/dehorning, treating leg or hoof injuries, and handling obstetrical complications such as pulling calves, performing Caesarian sections, and correcting uterine torsions. Xylazine can also be used to immobilize injured animals at processing plants before euthanizing and disposal in compliance with USDA humane handling requirements. There is no practical alternative for sedation in cattle. Limiting veterinary access to this critical drug will jeopardize animal welfare and human safety.

There are currently only two manufacturers of xylazine for veterinary use in the United States. Xylazine is a low-volume generic drug that generates little revenue for manufacturers. We do not believe there is a significant diversion of xylazine from the legitimate veterinary distribution channel. Increased

regulations on legitimate xylazine to address illicit xylazine will result in supply chain disruptions or eliminate the product from the market. If xylazine is scheduled as a controlled substance, there is a very real risk that it will cease to be available in Alaska because of the increased regulatory burden and costs for the manufacturers and distributors. Our understanding is that one of the manufacturers has already ceased making the product until there is more clarity and that one of the major distributors has ceased distributing it to states that have scheduled xylazine. This leaves one manufacturer currently providing product to the entire US market.

The veterinary community is not taking the drug epidemic and the role xylazine plays lightly. Discussions with the U.S. Drug Enforcement Administration (DEA) and lawmakers led to federal legislation that would address this issue with enforcement tools to target illicit xylazine traffickers. The Combating Illicit Xylazine Act (H.R. 1839/S. 993) was introduced on March 28, 2023. This bicameral, bipartisan bill is supported by a long list of stakeholders, including the American Veterinary Medical Association and the Alaska State Veterinary Medical Association. The legislation would engage and equip the DEA with tools to combat illicit xylazine trafficking while maintaining veterinarians' access and ability to legitimately use this critical animal sedative regulated by the Food and Drug Administration as a prescription animal drug.

It includes a provision to track the legitimate orders of xylazine through manufacturers and distributors using the DEA ARCOS system to detect any unusual ordering patterns. This feature would not normally be part of scheduling a drug like xylazine. Additionally, any diversion of xylazine from the veterinary supply chain for unlawful use in humans would be subject to harsher penalties under the Controlled Substances Act.

The Alaska State Veterinary Medical Association and the Alaska Farm Bureau hopes that you will avoid any premature action in response to this important issue as has been seen in Ohio and Pennsylvania and allow the well-thought and proactive actions on the federal level to take effect to both ensure the health and safety of the public as well as our veterinary patients. Indeed, we ask you to reach out to Alaska's congressional delegation and ask them to help expedite Congress' enacting of the Combating Illicit Xylazine Act (H.R. 1839/S. 993).

We would appreciate further discussion with you on this issue.

Sincerely,



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Attachment: Combatting Illicit Xylazine Act H.R. 1839/S. 993