

Request for a Temporary Class Drug Order

Misuse of Drugs Act 1975

Please forward completed form to: tcdo@health.govt.nz. An email will be sent to acknowledge receipt of this request within two working days.

Date: June 2021

Organisation: National Drug Intelligence Bureau

Name of substance, mixture, preparation or article: Etizolam

Has the substance (or mixture, preparation or article) been identified by ESR?

Yes

No

The Minister of Health must not make an order unless satisfied that the substance, preparation, mixture, or article that is to be specified in the order poses, or may pose, a risk of harm to individuals or to the public.

Supporting information should include at least one of the below examples.

- Evidence of drug abuse *eg, prevalence of the drug, levels of consumption, drug seizures, and/or potential appeal to vulnerable populations*

Etizolam is a 'novel benzodiazepine' currently classified as a benzodiazepine derivative under the Medicines Act 1981, however has not been approved for medical use in New Zealand. It is a controlled drug and not approved for medical use in most international jurisdictions. On 3 November 2020 etizolam was placed under international control at the 63rd session of the Commission on Narcotic Drugs.¹ It is commonly sold as a 'research chemical' through internet and social media platforms. This has led to a large increase in availability, and likely consumption in New Zealand.

Etizolam has been detected by the Institute of Environmental Science and Research (ESR) on 22 occasions resulting from seizures since 2014. These tests have found etizolam in powder, tablet, liquid, and paper blotter form. Separately, etizolam has been seized by the New Zealand Customs Service (NZCS) on at least 38 occasions since 2019. These seizures consisted of 3,536 tablets and 17.1 grams of powder (the equivalent of 8,500 doses).²

It is not currently possible to measure consumption using the Wastewater Analysis Programme, and there have been no academic studies to investigate its prevalence or usage rates in New Zealand. However, etizolam has been regularly recorded as being sold on

¹ United Nations Office of Drugs and Crime (2020) Current NPS Threats Volume 3.

² New Zealand Customs Service seizure statistics (2019-2021).

New Zealand-based dark web marketplaces and social media platforms. Etizolam is likely the most common novel benzodiazepine in New Zealand.

When ordered online, etizolam can cost as little as 50c per dose (2 mg). While little is understood about the about the user group of etizolam, this low cost is likely to appeal to vulnerable populations. This will especially affect people currently suffering from addiction to the illicitly diverted, but more expensive prescribed benzodiazepines which can cost up to \$10 per dose (for diazepam).

Due to its high potency (500 doses in one gram of powder), etizolam is easily imported into New Zealand and concealed. Due to its low dosage and inability to be accurately weighed, it is often volumetrically dosed in water and concealed in smaller containers such as eye drops or imported in the form of paper blotter tabs. This presents a challenge for New Zealand Police (Police) and NZCS to detect this substance.

Etizolam is also often sold in counterfeit 'Xanax' tablets designed to replicate the pharmaceutical drug alprazolam. These are produced under illicit circumstances, and often have varying amounts of etizolam present, leading to difficulties in dosing. This particular scenario was the subject of a Drug Information and Alert New Zealand (DIANZ) notification in August 2020.³

Please provide supporting information to demonstrate that this substance poses, or may pose a risk of harm to individuals or the public below

- Specific effects of the drug *eg, behavioural effects (disorientation, aggression, violence), toxicological effects (adverse health effects such as vomiting or seizing) or pharmacological effects (intoxication).*

Etizolam has been identified in four New Zealand coronial cases since August 2020 and one drug facilitated sexual assault case. As the coroner has yet to rule on these cases it is not possible to ascertain whether etizolam was the primary cause of death. The amount of etizolam is not quantifiable, making it impossible to ascertain whether the level of etizolam is comparable to the level found in etizolam-caused fatalities overseas. However, the necessary reference standard is currently being acquired by the ESR to allow this assessment.

Etizolam causes drowsiness and loss of consciousness, even at low doses. As a central nervous system depressant, it is especially dangerous when used in combination with opioids, alcohol and other central nervous system depressants.⁴ Etizolam is much stronger than any benzodiazepines legally prescribed in New Zealand with 1 mg of etizolam the equivalent of 10 mg of diazepam.⁵

Etizolam is a highly addictive substance, and withdrawal, like other benzodiazepines can be fatal without professional intervention.⁶ Individual reports on harm-reduction and drug information forums describe a large number of user reports covering tolerance, craving and

³ <https://www.highalert.org.nz/alerts-and-notifications/increase-in-fake-xanax-tablets/>

⁴ United Nations Office of Drugs and Crime (2020) Current NPS Threats Volume 3.

⁵ Drug Enforcement Administration (2020) Etizolam.

⁶ Licata, S. C., & Rowlett, J. K. (2008). Abuse and dependence liability of benzodiazepine-type drugs: GABAA receptor modulation and beyond. *Pharmacology Biochemistry and Behavior*, 90(1), 74-89.

withdrawal from etizolam.⁷ Other reports contain warnings to other people who use etizolam about the potential for overdose and other adverse health effects.

Internationally, in 2018 etizolam was implicated in the death of 548 people in Scotland alone, accounting for more than 80% of 'street benzodiazepine' deaths.⁸ In 2019, more people died from benzodiazepines than heroin in Edinburgh and were implicated in 814 Scottish drug deaths that year.⁹ This is a pattern that is increasingly prevalent across North America, the U.K and Europe as demand for benzodiazepines rises while prescribing practices are increasingly restrictive.

General comment for justification

The National Poisons Centre has stated "etizolam has a significant risk of harm as it is an unregulated psychoactive. There's a risk of harm with any use as dose, potency, are never guaranteed. Risks would include coma, seizures, and death by various mechanisms".¹⁰

With its low price and ease of availability online it is possible New Zealand will follow the trajectory of similar countries in seeing increasing levels of etizolam harm in line with a likely increase in consumption.

It is likely importation and distribution in New Zealand is at least partially incentivised by its status as a benzodiazepine derivative under the Medicines Act 1981, and the lower accompanying penalties relative to the Misuse of Drugs Act 1975.

⁷ For more information on these sources see Drug Foundation (2014) Erowid et al <https://www.drugfoundation.org.nz/matters-of-substance/may-2014/erowid-et-al/>

⁸ World Health Organisation (2019) Critical Review Report: Etizolam

⁹ National Records of Scotland (2020) Drug-related deaths in Scotland in 2019.

¹⁰ Private conversation (2021) Adam Pomerleau, Director of the National Poisons Centre.