

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 2022

Organisation: National Drug Intelligence Bureau

Name of substance, mixture, preparation or article: bromazolam

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 society and has not been classified under the Misuse of Drugs Act 1975.

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

Bromazolam is a 'novel benzodiazepine' currently classified as a benzodiazepine under the Medicines Act 1981, however it has not been approved for medicinal use in New Zealand. It is also not approved for medicinal use in any international jurisdictions. 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 increase in consumption in New Zealand.

Bromazolam was first detected in New Zealand by the Institute of Environmental Science and Research (ESR) in August 2020 following a Police seizure and has since been identified in five other samples. Three of these samples were provided to ESR by drug checking services, and two were identified in seizures at the border. Besides a single sample of powder in August 2020, all samples tested were in tablet form.

It is not currently possible to measure consumption using the Wastewater Testing Programme, and there have been no academic studies to investigate its prevalence or usage rates in New Zealand. However, bromazolam has been regularly recorded as being sold on New Zealand-based dark web marketplaces and social media platforms. It has also been identified by drug checking services.

When ordered in bulk from international vendors online, bromazolam can cost as little as 20c per dose (2 mg)¹. Single tablets have been sold from online marketplaces in New Zealand for \$10-\$20 NZD each, this is cheaper than illicitly supplied medicinal benzodiazepines like alprazolam.

Bromazolam is sold in New Zealand in different tablet forms, including those designed to replicate the pharmaceutical drug alprazolam. These are produced under illicit circumstances, and often have varying amounts of bromazolam present leading to difficulties in dosing. Bromazolam has also been identified in New Zealand in capsule and liquid form.

Please provide supporting information to demonstrate that this substance poses, or may pose a risk of harm to individuals or society as outlined 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).*

Bromazolam has not yet been identified in forensic toxicology cases in New Zealand. However there have been anecdotal reports of people having strong effects from the use of bromazolam.

Internationally, bromazolam has been linked to one death in which no other new psychoactive substance (NPS) or benzodiazepines were present.² In the first quarter of 2022 the Center for Forensic Science Research and Education in the USA identified bromazolam in 60 toxicology samples. Since April 2020 the rate at which bromazolam is identified has been increasing.³ This is likely to be an underrepresentation of the total number of cases due to the difficulty in identifying NPS in toxicology samples.

Bromazolam, like other benzodiazepines is reported as causing drowsiness and amnesic type effects and loss of consciousness. Benzodiazepines are central nervous system depressants and are especially dangerous when used in combination with opioids, alcohol, cannabis, and other central nervous system depressants.⁴ Benzodiazepines are highly addictive substances with withdrawal symptoms that can be fatal without professional intervention.⁵

In 2019, there were more drug-related deaths from benzodiazepines than heroin in Edinburgh and were implicated in 814 Scottish drug deaths that year.⁶ This is a pattern increasingly prevalent across North America, the United Kingdom and Europe as demand for benzodiazepines rises and prescribing practices are increasingly restrictive.

General comment for justification

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

¹ Currently can be found online from international retailers for \$5,000USD for 500g

² Center for Forensic Science Research and Education (2020) Bromazolam monograph (https://www.npsdiscovery.org/wp-content/uploads/2020/05/Bromazolam_050120_NMSLabs_Report.pdf)

³ Center for Forensic Science Research and Education (2022) Trend Report – Q1 2022: NPS benzodiazepines in the United States (https://www.npsdiscovery.org/wp-content/uploads/2022/04/2022-Q1_NPS-Benzodiazepines_Trend-Report.pdf)

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

⁵ 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.

⁶ National Records of Scotland (2020) Drug-related deaths in Scotland in 2019.

