

SECTION V

REGULATIONS

CHAPTER TWELVE

REGULATIONS FOR RESTRICTING THE AVAILABILITY OF ANABOLIC STEROIDS

INTRODUCTION

12.1 The Committee received a considerable body of credible evidence concerning the detrimental effects of sports drugs. These issues were discussed at length in Section II. At this point, however, it should be observed that the evidence supported the Interim Report's advice that:

In the Committee's view there is no doubt that drugs currently used to enhance performance pose a health risk. All of the classes of drugs used have side effects which can be both immediate and longer term. (para. 2.93)

12.2 With regard to anabolic steroids, the Interim Report advocated controls to be the same for both human use anabolics and veterinary anabolic steroids. Recommendation 10 (iii) put forward this concept; it recommended that the meeting of Commonwealth and State Ministers investigate the possibility of making veterinary anabolic steroids subject to the same degree of control as applies to anabolic steroids for human use.

12.3 Since making that recommendation, the Committee has received significant evidence, including evidence provided in camera, confirming its concern that the same controls should apply for human and veterinary anabolic steroids. On one hand, for example, the Committee was advised by Mr Kriss Wilson, that Dr Jeremijenko prescribed human anabolics for him on the basis of a program written out by a gym coach. (Evidence, pp. 2192-8) And on the other, the Committee received evidence from a Brisbane pharmacist, Mr Leon Azar, that he filled a significant number of doctors' prescriptions with veterinary steroids. (Evidence, pp. 2498-9) Mr Azar claimed that the doctors had written the

prescriptions specifically for veterinary steroids. (Evidence, p. 2465)

12.4 The Committee, then, has received evidence confirming that:

- anabolic steroids are being used extensively as sports drugs;
- there are significant detrimental physical and psychological effects of steroid use;
- anabolic steroids are being recognised as drugs of dependence;
- some doctors have been prescribing anabolic steroids specifically as sports drugs;
- some doctors have also been prescribing veterinary anabolic steroids; and
- some pharmacists have been filling prescriptions for anabolic steroids as sports drugs; they have provided both human use anabolic steroids and veterinary steroids for the purpose.

The Committee is therefore convinced that strict controls must be in place for limiting the availability of anabolic steroids and restricting their use; the controls must result in the same degree of restriction for human use anabolic steroids as for veterinary anabolics. Without such uniform restrictions, those abusing anabolic steroids would move to the variety most easily obtainable.

12.5 Accordingly, the Committee endorses recommendation 10 (iii) of the Interim Report: the restrictions on the availability of human use anabolic steroids and veterinary anabolics must result in a uniform control for those drugs.

IMPORTATION CONTROLS

12.6 The Committee has noted that the Minister for Housing and Aged Care requested the Minister for Science, Customs and Small Business in 1989 to implement changes to the Customs (Prohibited Imports) Regulations to tighten controls over the importation of substances used to enhance sporting performances. The Minister for Community Services and Health advised in a letter to the Committee Chairman (10 July 1989) that:

These changes will close loopholes previously in the legislation which enabled arriving passengers to bring unlimited quantities of medicines into Australia and will specifically restrict the importation by arriving passengers of substances such as anabolic steroids which may be used in attempts to enhance sporting performance. It will also remove the exemption from import control previously applied to many substances imported for veterinary use.

The Committee notes that these changes were gazetted on 21 December 1989. Importantly, anabolic steroids for human use and veterinary anabolics are not distinguished for this control - for importation purposes they are now subject to the same Customs Regulations.

12.7 Essentially, the changes bring anabolic steroids within the scope of Regulation 5A (I) of the Customs (Prohibited Imports) Regulations. The importation of substances named in that Regulation is prohibited unless permission, in writing, has been provided by the Secretary of the Department of Community Services and Health. In effect, importation of small amounts for personal use is not allowed as a matter of course; Departmental approval is required in every case.

12.8 The Committee is satisfied that the Customs Regulations have been amended to enable the prosecution of importers of even small quantities of anabolic steroids destined for performance drug use. Further, the Committee notes that the measure taken to

ensure this control over anabolic steroids complies with Recommendation Eight of the Interim Report:

The Committee recommends that regulations concerning the importation of veterinary anabolic steroids be made as stringent as those that apply to anabolic steroids for human use.

DISTRIBUTION CONTROLS

Anabolic Steroids for Human Use

12.9 Since the Interim Report, the Committee has been able to devote some attention to the ways in which controls on the supply of anabolic steroids might be effected. The Interim Report recommended (Recommendation 10) that Commonwealth and State Ministers:

- (i) agree to make anabolic steroids prepared for human use a Schedule Eight drug.

This recommendation has been acknowledged by the Minister for Community Services and Health. In his letter to the Committee Chairman dated 10 July 1989, Dr Blewett confirmed that the Ministerial Council on Drug Strategy had agreed to form a working party to examine options for putting in place additional controls on anabolic steroids. The working party was due to meet in September 1989. However, the domestic airline dispute caused that meeting to be postponed. It is now scheduled to be held after the tabling of this Report.

12.10 The Committee confirms its recommendation that anabolic steroids prepared for human use should be a Schedule Eight drug; Schedule Eight covers drugs of dependence. The Committee notes in support of its recommendation that anabolic steroids are becoming recognised as drugs of dependence. The Journal of the American Medical Association in the first week of December 1989 published a report from the Yale University School of Medicine. This report advised that 'evidence reviewed by the researchers points to a:

previously unrecognised drug addiction, a sex steroid hormone-dependence disorder. (Reuter report, 7 December 1989)

The researchers concluded that the steroid dependence was characterised by extended use, failed attempts to quit despite psychological damage, withdrawal symptoms and use of hormones to relieve such symptoms.

Recommendation Forty-Two

12.11 That anabolic steroids prepared for human use be listed as Schedule 8 drugs and that only medical practitioners (and not veterinarians) be entitled to prescribe them.

Veterinary Anabolic Steroids

12.12 The Interim Report advised (at para. 4.11) that any controls over banned drugs would need to extend to veterinary as well as human pharmaceuticals. Recommendation Six prescribed:

action to make the supply for human use of any anabolic steroid labelled for veterinary use a criminal offence punishable by the same penalties as those that apply to the unauthorised use of human anabolic steroids.

12.13 It was noted in the Interim Report that the Government of Western Australia was to introduce a regulation to make the administration and supply to humans of any medium labelled for veterinary use an offence under the Poisons Regulations. The Report advocated (para. 4.17) that this lead be followed by the other States.

12.14 The Health Department of Western Australia has since advised that the human use of veterinary preparations has been proscribed in that State. (Letter to Committee Secretary from Health Department of Western Australia, 24 October 1989) Regulation 33A of the Poisons Regulations was gazetted on 11 November 1988; it states:

A person shall not:

a) administer to himself or another person

or

b) sell or supply for human use a medicine or other product which contains a poison and which was prepared for use in animals.

12.15 Further, Queensland has adopted similar regulations. The human use of veterinary steroids in Queensland has been proscribed through subregulation A5.04 of the Poisons Regulations 1973. The subregulation, which was gazetted on 19 August 1989, is as follows:

A5.04 A person shall not:

(a) administer to himself or to any other person; or

(b) prescribe, dispense, sell, supply or use for human use a dangerous drug, restricted drug or poison which is manufactured, prepared, packed or labelled for use in the treatment of animals, unless he has received the written approval of the Director-General.

12.16 The Committee considers that regulations and/or legislation of the kind adopted by Western Australian and Queensland is essential for all States and Territories. It covers the supply and administering of veterinary steroids to humans, a restriction that needs to be in place across Australia. The question remains, however, whether (even for those States with such legislation) those controls are comprehensive enough.

12.17 The Committee considers that the risk of veterinary steroid abuse by humans will in fact rise should all States and Territories list human anabolic steroids as Schedule Eight drugs.

While it will continue to be necessary to have a prescription for human anabolic steroids, veterinary steroids would be available on the understanding that they were intended for animals.

12.18 The Committee was advised by a veterinary drug wholesaler, Mr G. Zeltzer, that vets would very seldom write a prescription for Schedule 4 drugs.

Vets do not need to give a scrip, according to the Act. They can prescribe medicine and hand it over to their client or inject it into the animal without writing any script. I think the law states that they can leave up to seven days' treatment at any one time, per animal. (Evidence, pp. 2960-1)

With regard to Schedule Eight drugs Mr Zeltzer advised that:

There are some S8 and products such as prostaglandins, where the Veterinary Association has stated that he must actually administer the drug. He cannot hand over the drug to you. Vaccines are of that nature, for instance. (Evidence, p. 2962)

The following discussion then took place:

CHAIRMAN - So if steroids were made S8 you could not actually sell them to the owner of the dog and let him walk out the building with them?

Mr Zeltzer - As far as I understand it, that is right.

CHAIRMAN - They would have to be administered by the vet?

Mr Zeltzer - He would have to administer it, yes.

CHAIRMAN - And you would have to keep a record, presumably, of the transaction?

Mr Zeltzer - We keep a daily book on all transactions of S8 products.

CHAIRMAN - Would the vet have to keep that as well? He would have to account for them, would he not?

Mr Zeltzer - In practice I have not seen any vet keep that kind of record.

CHAIRMAN - For S8 drugs.

Mr Zeltzer - But he should have a record of any treatment that he gives to any animal.

CHAIRMAN - So you are obliged to keep a register of S8 drugs but the vet is not?

Mr Zeltzer - As far as I know. I am not exactly sure of that; I have not had any experience with it. (Evidence, p. 2962)

12.19 The Committee considers that there are three major principles to be observed in attempting to constrain the abuse of veterinary steroids by administration to humans; two concern access to the drug. First, access to anabolic steroids should be restricted as far as is possible. Second, where possible pastoralists should have reasonable access to anabolic steroids for the purpose of preventing pizzle rot in sheep and stimulating growth promotion in food producing animals. Third, the human abuse of veterinary anabolics should be punishable by law.

12.20 Essentially, the Committee considers that the first principle is necessary because it is not sufficient to control a problem as widespread as that concerning anabolic steroids simply by relying on legal sanctions centred on use. Were it possible to possess veterinary anabolic steroids without penalty or other limitation, many persons tempted to use steroids would take the veterinary form if:

- human anabolic steroids become a Schedule 8 drug obtainable only on prescription, and
- the risk of detection of the administration of steroids for a person involved in say, bodybuilding, would be very remote; the chances of a successful prosecution of such an offence then would be quite low.

The black market in steroids demonstrates the lengths to which steroid users will go to use anabolic steroids.

12.21 Accordingly, there should be an effective regime in place for veterinary anabolic steroids that:

- . allows legitimate necessary access by pastoralists;
- . provides sanctions against human use; and
- . restricts possession of veterinary anabolic steroids as tightly as possible.

12.22 This situation is achievable in a number of steps.

ACCESS

12.23 Anabolic steroids for pizzle rot and promoting growth are available to pastoralists without prescription as Schedule 6 drugs. Schedule 6 drugs are those:

Poisons that must be available to the public but are of a more hazardous or poisonous nature than those classified in Schedule 5. (NHMRC Standard for the Uniform Scheduling of Drugs and Poisons No. 3)

To prevent the open availability of veterinary steroids suitable for human use, anabolic steroids available under this schedule should not include injectable forms. That is, anabolic steroids listed as Schedule 6 drugs should be limited to those with a subcutaneous (pellet) application. The Tasmanian Department of Health Services advised that:

Pellets appear to have a limited liability to misuse. Pellets could be taken orally, but the effects are likely to be weak because of metabolism in the liver. Subcutaneous implants of testosterone are already used in human medicine (eg Organon brand, 100 and 200 mg), and it is possible that the veterinary product could be illegally used subcutaneously in a similar way. However, the number of pellets required and the unpleasant procedure make it unlikely that any but the most determined drug

user would consider employing this procedure.
(Letter to Committee Secretary, 19 October
1989)

12.24 The Committee received advice that there continues to be a legitimate need for injectable oil-based anabolic steroids in veterinary practice. The Australian Veterinary Association Ltd advised the Committee:

Both sub-cutaneous implants and oil based preparations of testosterone are used in wethers with the recommendation in both cases that treatment should not be given within 21 days of slaughter. The significant difference is that pellets are used largely for prevention or protection in periods of risk while the oil based injections are given as treatment once balanoposthitis begins to occur ...

In summary both implants and oil based injections have specific uses but the implants would be inconvenient to use and less effective in most cases and in most animal species. (Letter to Committee Secretary, 10 January 1990)

12.25 The Committee recognises the possibility that there may continue to be a need for pastoralists in certain circumstances to have their animals treated with the oily injectable form of veterinary anabolic steroid. For this reason the Committee takes the view that this form of treatment should continue to be available, but only through the administration of an injection by veterinarians. The Tasmanian Department of Health Services, in supporting this view, concluded that:

In summary, therefore, a prohibition on the possession and use of oily injections by anyone other than a veterinary surgeon, and the replacement of the oily injection by wider use of pellets, would appear to be a practicable way of tightening of controls to limit opportunities to misuse steroids. However, the impact on pastoral practices needs to be considered closely before a final decision is made. Amendments would need to be made to poisons legislation in each jurisdiction to implement such a prohibition. (Letter to Committee Secretary, 10 January 1990)

12.26 Significantly, the Committee was advised only that oily injectables continue to be necessary; no such claim was made for water-based anabolic steroids.

Recommendation Forty-Three

12.27 The Committee recommends that no injectable veterinary anabolic steroids be available as Schedule 6 drugs. Veterinary anabolic steroids available to the community without prescription under Schedule 6 should be limited to the pellet form, having subcutaneous application.

SCHEDULING

12.28 Of course, the objective behind removing injectable veterinary anabolic steroids from Schedule 6 - the removal of access to them by the general public - will not be satisfied merely by removing those drugs from Schedule 6; they must be relisted so as to prevent general access.

12.29 The Minister for Primary Industry and Energy, in a letter to the Committee Chairman, provided a briefing paper on rescheduling measures for veterinary anabolic steroids. That paper advised that rescheduling veterinary steroids as Schedule 8 drugs would be inappropriate:

Schedule 8 drugs are those illicit narcotic and stimulant drugs referred to DPSC for scheduling by the Drugs of Dependence Branch of the Department of Community Services and Health

- inclusion of drugs in Schedule 8 is a consequence of Australia's obligations under the International Conventions dealing with narcotic and psychotropic drugs and accords with the recommendations of the Williams Report resulting from the 1980 Australian Royal Commission of Inquiry into Drugs

... Consequently it would seem inappropriate to place anabolic steroids

in Schedule 8. (Letter to Chairman, 2 June 1989)

The paper, however, went on to suggest that:

Whilst scheduling has never been completely successful in restricting availability and possession of drugs, eg heroin and cocaine, if this option was to be pursued, the most appropriate schedule would appear to be Schedule 4, Appendix D, of the Standard for the Uniform Scheduling of Drugs and Poisons. Such a move will no doubt be seen by some as an over reaction to the perceived use of these veterinary preparations in humans.

- The list of drugs in Appendix D includes substances in S4 and S8 to which additional controls on possession and/or supply should be imposed by State/Territory Regulation. Controls may relate to possession, recording, destruction, prescribing and dispensing. (Letter to Chairman, 2 June 1989)

12.30 The Committee accepts this suggestion. Were oily injectable veterinary anabolic steroids listed under Schedule 4 Appendix D with a notation that required both administration and possession only by registered veterinarians, an adequate control over possession of such drugs would be in place, while permitting them to be administered to animals as necessary.

12.31 Support for this proposed scheduling came from the Health Department Victoria. The Acting Chief Manager advised the Committee:

The Health Department Victoria would support the following actions intended to control access to veterinary anabolic steroids for inappropriate human use:

- . amendments to drugs and poisons legislation to proscribe the supply for human use of anabolic steroids intended for veterinary purposes;
- . the inclusion in Appendix D of the NH&MRC's Standard for the Uniform Scheduling of Drugs and Poisons of those veterinary anabolic steroids which are

the subject of inappropriate human use, in order to confine their supply to the prescription of a veterinarian; and

- . the rescheduling to Schedule 4 of those current formulations of Schedule 6 anabolic steroids intended for veterinary purposes which have been found to be the subject of inappropriate human use. (Letter to Committee Secretary, 11 January 1990)

Recommendation Forty-Four

12.32 The Committee recommends that oily injectable veterinary anabolic steroids be listed under Schedule 4 Appendix D with the notation that possession and administration is proscribed except by registered veterinarians, who must maintain strict records of such administration. Further, the only form of injectable veterinary anabolic steroid available even to veterinarians should be the oil-based versions which are relatively easy to detect if ultimately misused for human consumption.

SCHEDULING VERSUS LAWS PROSCRIBING USE

12.33 The view has been put to the Committee that the rescheduling of veterinary anabolic steroids to Schedule 4 Appendix D will not be as efficacious as (simply) legislating to proscribe human use of veterinary products (as Queensland and Western Australia have done). The Western Australian Commissioner of Health has advised that:

Concerning the proposal by the Commonwealth Department of Primary Industries and Energy to place injectable veterinary steroids in Appendix D of Schedule 4 of the Standard for the Uniform Scheduling of Drugs and Poisons proscribing supply to veterinarians, I do not believe this would assist our objectives to the same extent as Regulation 33A mentioned earlier. I would not, however, oppose the proposal provided the injectable steroids referred to are those currently in Schedule 4 and not those in Schedule 6 which, I am advised, must be available to farmers without prescription for growth promotion purposes and

prevention of pizzle rot in sheep. (Letter to
Committee Secretary, 24 October 1989)

The question, then, is whether the scheduling of veterinary anabolic steroids is necessary where the law proscribes application to humans.

12.34 The Committee's view is that it is necessary to have both appropriate scheduling of veterinary anabolic steroids, and laws proscribing human use. The reasons are as follows.

12.35 The Committee has recommended that human anabolic steroids become a Schedule 8 drug and that veterinary anabolic steroids be subject to the same degree of control. However, the Department of Primary Industry and Energy has advised that it would be inappropriate to list veterinary anabolic steroids under Schedule 8 (see para. 12.29), and pastoralists are currently perceived to have a legitimate need for access to some steroids. Therefore, the Committee has recommended that pellet form veterinary steroids should remain available under Schedule 6. Injectable veterinary anabolics (having possible human application), however, should be listed under Schedule 4 Appendix D so that they may be used only by a veterinarian.

12.36 It may be asked, then, why legislation is required proscribing human use of veterinary anabolics if this scheduling regime is in place. The answer is that those laws perform three functions:

- they provide sanctions against the application to humans of the (freely available) Schedule 6 veterinary drugs;
- importantly, in the law as adopted in Queensland, they proscribe the prescribing of injectable veterinary steroids (Schedule 4 drugs) by doctors; and
- they proscribe the retailing of veterinary anabolics by veterinarians.

12.37 Approaching the problem from the other side, if such legislation is in place, why is scheduling necessary? The answer is that without scheduling, the possession of these drugs would not be subject to control. The fact that the illegal human application of those drugs would take place in private with real prospect that it would not be detectable, means that the temptation for people (like bodybuilders) to use veterinary anabolics would be very considerable. Possession of such drugs would not be illegal and human application would be difficult to detect and prosecute.

12.38 Further, because possession of veterinary anabolic steroids of any form by anyone would not be illegal without scheduling, there would be no definition of the veterinary anabolic black market unless scheduling was in place. While there may be laws against human use, veterinary drugs sold privately for that purpose could not be identified as such. Indeed, there could be no assurance that veterinary anabolic steroids sold in any circumstances were not bought for that purpose. If veterinary anabolic steroids are scheduled as this Report recommends, however, then any possession of Schedule 4 veterinary steroids by anyone except a licensed wholesaler or registered veterinarian would amount to black market possession. The prospects for controlling human application, therefore, are much greater with scheduling (in addition to legislation against use) than without it. And the task of law enforcement regarding these substances would be facilitated.

CONSEQUENCES FOR RACING, PACING AND COURsing

12.39 The Committee is mindful of the fact that the restrictions that it has recommended for veterinary anabolic steroids will have implications beyond the pastoral industry. In particular, the consequences will be felt in animal sports.

Racing

12.40 The Committee's recommendations should have minimal effect, however, on Thoroughbred horse racing. The Australian Rules of Racing are administered in each State and Territory by the relevant Turf Club and its racing stewards. Those rules provide, since 1 August 1988, for the testing of horses (on the days that they race) for anabolic steroids. A raceday sample positive for anabolic steroids would be a breach of the requirement for trainers to present horses free of 'prohibited substances'. Notably, the Australian Jockey Club has advised that 'since the ban on steroid usage in racehorses has been imposed there have been no confirmed positives to them as yet in Australia'. (Letter to Director, NSW Department of Sport, Recreation and Racing, 6 October 1989) The point is that limiting possession of injectable veterinary anabolics to veterinarians would not impose constraints on Thoroughbred racing additional to those already in place.

12.41 Indeed, the Manager of Racing Services for the Queensland Government has advised that in that State the Rules of Racing countenance the therapeutic application of anabolic steroids provided that it does not result in detection in raceday samples and that:

it has been prescribed by and administered under the supervision of a registered veterinary surgeon. (Letter to Committee Secretary, 2 November 1989)

12.42 The Committee's recommendation on the availability of veterinary steroids should have no effect on Thoroughbred racing in that:

- steroids are proscribed substances in raceday samples, and
- for Queensland at least, the administration of anabolic steroids to registered racehorses must occur under the supervision of a veterinarian; if the Committee's

recommendation is adopted that will be the case in all States.

12.43 Further, the Committee notes that the Thoroughbred racing industry has ceased the use of anabolic steroids on the scale practised prior to the banning of them from August 1988. The Committee was advised by the General Manager of United Veterinary Supplies that:

Since then there has been a dramatic drop in sales of anabolic steroids. In fact, there has been approximately a 75 percent drop, which indicates that the main use of the anabolic steroid was to enhance the performance of racing animals. (Evidence, p. 2974)

Pacing

12.44 For Standardbred Pacing the Committee understands that the situation varies across Australia. The Western Australian Office of Racing and Gaming has confirmed that:

At present, there is no ban on the administration of steroids to pacers. However, this position is under review by the Australian Harness Racing Council.

Despite the use of steroids not being banned, swabs are taken from pacers and tested for steroids. Data on the prevalence of these substances is being collated. (Letter to Committee Secretary, 23 November 1989)

In Tasmania, by contrast:

they are not permitted to be used on racing animals so as to affect the performance of such animals in a race at a registered race meeting. (Letter to Committee Secretary, 19 October 1989)

And the South Australian Harness Racing Board advised that:

The Australian harness racing industry through its controlling body the Australian Harness Racing Council is undertaking an in depth

study of the question of the use of anabolic steroids. (Letter to South Australian Department of Recreation and Sport, 12 October 1989)

12.45 While anabolic steroids are not banned throughout Australia in Pacing in the way adopted by the Thoroughbred racing authorities, it seems that the question of nominating the drug as a proscribed substance in raceday samples is under review. It is difficult to conceive that the Pacing authorities could have objections to this option such that it could be adopted for Thoroughbred racing but not Standardbred pacing. Accordingly, the Committee considers that its recommendations concerning veterinary steroids ought not to be an inconvenience to the Pacing industry.

Coursing

12.46 For Greyhound racing, there is also a varied picture across Australia on anabolic steroids. In Western Australia both anabolic and cortico steroids are prohibited and the analysis of swabs is routinely carried out. While the Greyhound Racing Association has successfully proceeded against several trainers for the use of dexamethasone, the Western Australian Office of Racing and Gaming has advised that there is no process available to the Government Chemical Laboratories to test for anabolic steroids. It is hoped, however, that a procedure will be available in early 1990. (Letter to Committee Secretary, 23 November 1989)

12.47 In South Australia, steroids are permitted for therapeutic treatment of Greyhounds as long as they are not administered within seven days of a race. Further, the Greyhound Racing Control Board advised the South Australian Department of Recreation and Sport that a new testing laboratory was being set up in Melbourne capable of detecting steroids in Greyhounds; the laboratory is known as Racing Analytical Services Ltd. Nevertheless, the Chairman of Stewards in South Australia considered that, because of inadequate statistics on the persistence of steroids in Greyhounds, it would be difficult for

stewards handling an inquiry into a positive swab. (Letter to South Australian Department of Recreation and Sport, 18 October 1989)

12.48 The Committee understands that the anabolic steroid issue is under consideration by Greyhound racing authorities and recommendations concerning the administration of steroids to racing Greyhounds are being developed. Significantly, there is no indication that the Committee's recommendation to limit the administration of injectable veterinary steroids to veterinarians would inconvenience unduly the Greyhound racing industry. Provided they were administered by a veterinarian within the rules of Greyhound racing, trainers would continue to be able to treat their animals with steroids for therapeutic purposes.

12.49 That said, the Committee considers that the health effects of the use of anabolic steroids in racing animals is likely to be similar to that in humans. That is, racing animals may be at risk of serious physical and psychological damage.

RECOMMENDATIONS

Recommendation Forty-Five

12.50 The Committee recommends that the Pacing and Coursing industries ban the use of anabolic steroids in racing animals in order to limit the legitimate demand for veterinary anabolic steroids.

Recommendation Forty-Six

12.51 The Committee recommends that the Senate refer the matters raised in Chapter Twelve of this Report to the Senate Select Committee on Animal Welfare for investigation and report.

