



---

# NAMIBIA MEDICINES REGULATORY COUNCIL

---

Ministerial Building  
Harvey Street  
Private Bag 13198  
Windhoek

OFFICE OF THE REGISTRAR OF MEDICINES

Tel: No: 061 -2032465  
Fax No: 086 451 8283  
bertha.alpo@mhss.gov.na

Inq: Bertha Alpo

19 October 2021

Ref no: 13/3/1/1

**CC: PHARMACEUTICAL SOCIETY OF NAMIBIA  
NAMIBIA MEDICAL SOCIETY  
MEDICAL ASSOCIATION OF NAMIBIA  
ALL ALLIED HEALTH PROFESSIONS SOCIETIES  
VETERINARY COUNCIL OF NAMIBIA  
VETERINARY SOCIETY OF NAMIBIA**

Dear Sir/Madam

**REF - CURRENT REGULATIONS FOR SPECIFIED SCHEDULED 3 (NS3\*\*) MEDICINES**

**Background**

The Namibia Medicines Regulatory Council (NMRC) is considering to regulate specified schedule 3 medicines the same way as schedule 4 medicines. The need to consider stricter controls is necessitated by the following:

1. Regulations for specified schedule 3 medicines in terms of record keeping are only applicable to importers/exporters, there is a need to apply these regulations to prescribing and dispensing healthcare professionals.
2. The misuse of the specified schedule 3 medicines exists, therefore additional controls are needed.

In light of the above, the NMRC would like to consult associations/ stakeholders to assist in making an informed decision. The NMRC is therefore seeking your organisation's input on the need to regulate specified schedule 3 medicines the same way as schedule 4 medicines/substances. Kindly submit your input before or on the 12<sup>th</sup> November 2021.

Please find attached the list of specified schedule 3 substances for your easy reference.

Your input in this regard will be highly appreciated.

Yours sincerely,



**MR JOHANNES GAESEB**  
**REGISTRAR OF MEDICINES**

**Schedules of Medicines (Gazette No. 7509, 19th April 2021)**

**SCHEDULE 3**

Specified Schedule 3 substances listed in this schedule are subject to additional controls in terms of section 29 of the Act as required under the provisions of the 1971 Convention on Psychotropic Substances and are denoted by \*\*

Alprazolam**
Barbituric acid**, unless listed in another Schedule, but not amobarbital, cyclobarbital, pentobarbital and Secobarbital (NS2) and not preparations and mixtures containing more than 90 milligrams of phenobarbital per minimum recommended or prescribed dose if intended for continued use in epilepsy (NS2).
Benzodiazepines**, unless listed in another Schedule and except flunitrazepam (NS4).
Bromazepam**
Chlordiazepoxide**
Clobazam**
Clonazepam**
Clonazolam (Benzodiazepine) **
Clozapine**
Clorazepic acid**
Diazepam**
Diclazepam (Benzodiazepine) **
Estazolam**
Flubromazolam (Benzodiazepine) **
Flurazepam**
Ketazolam**
Loprazolam**
Lorazepam**
Lormetazepam**
Medazepam**
Midazolam**
Nitrazepam**
Oxazepam**
Phenazepam**
Prazepam**
Quazepam**
Temazepam**
Triazolam**
Zolpidem**
Zopiclone**