

June 2, 2025

Representative Ryan Spain  
73rd District  
Deputy Minority Leader  
314 Capitol Building  
Springfield, IL 62706

Re: Concerns with SB1773

Dear Representative Spain:

On behalf of The Alliance for Pharmacy Compounding, we appreciate the opportunity to submit comments regarding concerns with Senate Bill 11773, now held for Third Reading/Final Action in the House, which seeks to reschedule Xylazine products, with exceptions for veterinary use.

The Alliance for Pharmacy Compounding is the voice for pharmacy compounding, representing more than 600 compounding small businesses – including compounding pharmacists and technicians in both 503A and 503B settings – as well as prescribers, educators, researchers, and suppliers. We have a large number of members located in the state of Illinois.

Xylazine is a drug used in veterinary medicine as a sedative with analgesic and muscle relaxant properties. It is used on many different animal species such as horses, dogs, bear, deer, rats, elk, and numerous large species of wildlife and zoo animals to calm and facilitate handling, perform diagnostic and surgical procedures, relieve pain, or act as a local anesthetic. Xylazine is approved by the U.S. Food and Drug Administration (FDA) for veterinary use only. It is available in liquid solutions at 20, 100, and 300 mg/ml. Typically, this drug is administered either alone or in conjunction with other anesthetics (e.g., ketamine or barbiturates) intravenously, intramuscularly, or orally for sedative and relaxant properties. In certain animal species (e.g. Brown Bears) and for certain procedures, xylazine must be compounded in more concentrated doses or in combination with another drug. The ability to have xylazine compounded for these animals and procedures is critical to their success.

Reports and alerts indicate an increased prevalence of xylazine as an adulterant in drugs of abuse mixtures, and we applaud the Illinois State Legislature for taking measures to address this rising problem. However, the proposed language in SB1773 included in the new Section 309.1 allows that:

Xylazine shall not be considered a controlled substance when:

1. used by licensed Illinois veterinarians dispensing or prescribing for, or administering to, a nonhuman species of a drug containing xylazine that has been approved by the U.S. Food and Drug Administration;
2. used by licensed Illinois veterinarians dispensing or prescribing for, or administering to, a nonhuman species that is permissible under the Federal Food, Drug, and Cosmetic Act;
3. manufactured, distributed, or used as an active pharmaceutical ingredient for manufacturing an animal drug approved under the Federal Food, Drug, and Cosmetic Act;

Unfortunately, compounded medications of the type that might be used in wildlife and zoo animals are not approved by the Food and Drug Administration. If passed as written, SB1773 would not exempt the compounding of xylazine containing preparations from Schedule 3 for these animals. We would, therefore, respectfully suggest adding the following language at the end of subsection (3), “or a compounded form of xylazine labeled for veterinary use and prescribed or dispensed by a licensed veterinarian.” This language provides the desired restriction on accessibility of xylazine products for human use while preserving veterinary access to all forms of the drug that might be required for patient care.

We strongly urge the Illinois State Legislature to ensure that the final language of this bill recognizes that compounded medications, including compounded xylazine preparations, when prescribed by a licensed veterinarian, are a valid and necessary part of patient care. We appreciate the opportunity to comment on this legislation and encourage you to reach out to us with any questions or concerns.

Sincerely,



Scott Brunner, CAE Chief Executive Officer [scott@a4pc.org](mailto:scott@a4pc.org)

cc: Representative Robyn Gabel

Representative Norine K. Hammond

Representative Kam Buckner

Representative Elizabeth "Lisa" Hernandez