

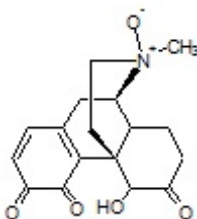
Drug Status Report

Drug: 5-Hydroxy-17-methyl-3,4-dihydromorphinan-17-oxide-3,4,6-trione

Drug Name Status: 5-Hydroxy-17-methyl-3,4-dihydromorphinan-17-oxide-3,4,6-trione is the chemical name

Chemical Name: 5-Hydroxy-17-methyl-3,4-dihydromorphinan-17-oxide-3,4,6-trione

Chemical structure:



Molecular Formula: C₁₇H₁₉NO₅

Pharmacological class / Application: opiate related substance

International status:

US: The substance is not currently listed on the schedules to the US Controlled Substances Act and is not mentioned on the DEA website. However the definition of narcotic drug in the CSA “(A) Opium, opiates, derivatives of opium and opiates, including their isomers, esters, ethers, salts, and salts of isomers, esters, and ethers, whenever the existence of such isomers, esters, ethers, and salts is possible within the specific chemical designation” may include 5-hydroxy-17-methyl-3,4-dihydromorphinan-17-oxide-3,4,6-trione. Hydrocodone is listed on Schedule II to the CSA. In addition, 5-Hydroxy-17-methyl-3,4-dihydromorphinan-17-oxide-3,4,6-trione may also be controlled by the CSA under the analogue provision, “..controlled substance analogue means a substance - the chemical structure of which is substantially similar to the chemical structure of a controlled substance in schedule I or II”.

United Nations: The substance is not listed on the Yellow List - List of Narcotic Drugs under International Control nor the Green List - List of Psychotropic Substances under International Control.

Canadian Status: Item 1 of Schedule I to the CDSA is “Opium Poppy (*Papaver somniferum*), its preparations, derivatives, alkaloids and salts, including:

- (1) Opium
- (2) Codeine (methyldmorphine)
- (3) Morphine (7,8-didehydro-4,5-epoxy-17-methylmorphinan-3,6-diol)

(4) Thebaine (paramorphine)
and the salts, derivatives and salts of derivatives of the substances set out in subitems (1) to (4),
including:”

There then follows a list of 27 substances to illustrate the types of substances included in this item of the schedule. This list has been interpreted to include, as well, the salts, derivatives and salts of derivatives of these substances.

Item 1 of Schedule I has been interpreted to include a broad range of substances related to the opium alkaloids and the substances included specifically in item 1. In assessing the status of substances in the past four years, no substance similar to any of the opium related substances has been determined to be “non-controlled”, i.e., outside the application of the CDSA. During the same period, many substances related to the opium alkaloids have been declared to be “controlled”.

Structurally, 5-Hydroxy-17-methyl-3,4-dihydromorphinan-17-oxide-3,4,6-trione can also be considered to be included in item 10 of Schedule I, “Morphinans, their salts, derivatives and salts of derivatives”.

Recommendation: 5-Hydroxy-17-methyl-3,4-dihydromorphinan-17-oxide-3,4,6-trione is included in Item 1 of Schedule I to the CDSA and is a controlled substance.

June 1, 2009