RESEARCH ADVISORY PANEL OF CALIFORNIA

FRIDAY, APRIL 10, 2026 - 1:30 PM

(REGULAR SESSION)

MEETING MINUTES

## OPEN SESSION

1. **Call to Order, Establishment of a Quorum, and General Announcements**

Acting Chair: Panel Member Boris Heifets served as Acting Chair in the absence of Chair Jennifer Mitchell. Acting Chair Boris Heifets called the meeting to order and asked for quorum to be established.

Panel Members present: Boris Heifets, James Gasper, Kelly Lee, Daniele Piomelli, Judy Aoyagi, April Powell-Willingham.

Panel Members absent: Chair Jennifer Mitchell.

Quorum was established.

RAPC staff present: Executive Officer Tanveer Khan

**2. Approval of the February 13, 2026 Panel Meeting Minutes**

Panel members had no comments on the February meeting minutes that were previously distributed. Panel Member Piomelli made the motion to approve, and Acting Chair Heifets confirmed approval of the meeting minutes as distributed.

**3. Schedule II Controlled Substances for Non-Human Research**

Acting Chair Heifets said that part of AB 1103 gave RAPC purview over Schedule I and Schedule II controlled substance use in both human and non-human studies, and this created a lot of new requirements for institutions across California that are using these drugs for routine veterinary purposes like euthanasia. The Panel had previously discussed whether RAPC could issue waivers to institutions so that they would not need to ask permission every time to use certain drugs for euthanasia. He asked for any specific decision points the Panel would make.

Panel Member Piomelli pointed out that as soon as the new piece of information went around, he received a slew of emails from researchers and his colleagues who were not happy. He said they should do something, they could do something, and the sooner they do it, the better off.

Acting Chair Heifets suggested there were a couple of options RAPC could opine on, such as what is gained from the legislation and whether what RAPC would want is a waiver for a broad swath of schedule II activities.

The Executive Officer summarized the previous discussion: That AB 1103 was broadly worded and includes studies that are not actually studying pentobarbital but using it for the purpose of euthanasia. Panel Members were given sixty days to reach out to their colleagues and find out what kind of concerns, questions, and comments they had. And the waiver would basically be sent not to individual researchers, but to the Office of Research or other similar entity within institutions. This would be one exemption and that if there were other exemptions that were needed, they would be handled separately. The previous discussion ended with just this exemption for Schedule II's used for non-animal research for euthanasia. One of the questions that came up was whether it is just pentobarbital or whether other schedule II substances are being used for euthanasia.

Panel Member Piomelli indicated that 90% is pentobarbital, that there is also etorphine and carfentanil for those who do veterinary work, and that they are used for restraint, mostly.

Panel Member Lee asked whether there is a way to group the agents that are used specifically for euthanasia rather than listing specific products, or maybe inclusive to all.

The Executive Officer agreed the intention was to be inclusive of all Schedule II's that could be used for euthanasia.

Acting Chair Heifets asked what input was needed to move forward with a solution like that.

Panel Member Piomelli asked how the Executive Officer saw this happening and that he thought the Office of Research was the right counterpart.

The Executive Officer suggested the idea would be to keep it as easy, simple and efficient as possible, so instead of requiring individual researchers, one central office of research or whomever is the hierarchical top of research at each organization, institution, or company to send RAPC a of list of these studies with information identifying the studies, the substance that's being used and the attestation that they're not also studying the effects of those drugs in these animals, and that they are not also studying, for example, the effects of MDMA in these animals. The study sends that to RAPC. The Executive Officer suggested that the idea is to address any concerns to make it as streamlined and efficient as possible.

Panel Member Piomelli asked whether that meant asking universities to do a census of their studies, a priori or a posteriori. He clarified his question about whether RAPC would be asking them to collect information from investigators and send it back to RAPC each year because that would be substantially burdensome and the a priori would be almost impossible.

Executive Officer Khan said the goal was to meet the requirements of the statutory change in the most efficient way possible, and that is for the Panel to determine.

Panel Member Piomelli said it would be administratively challenging to keep track of all animals being treated, the amount of pentobarbital being used and measuring it, so his recommendations would be to give a blanket waiver as long as the pentobarbital is being used in animal research. He said that would be the best possible scenario in a difficult situation.

Executive Officer Khan said she thought the intent of the discussion in February was to submit a list of studies using pentobarbital for euthanasia to meet the statutory requirement in the most practical way possible.

Panel Member Piomelli said he figured that, practically, the IACUCs could provide the Office of Research of each university with a list of protocols that have pentobarbital in them, so the investigators would not have to do anything. That the IACUCs would have to send an email once a year, which would probably be enough. He asked whether the other Panel Members would be satisfied because that would be satisfactory to him. He pointed out that Panel Member Powell-Willingham would be quite important.

Acting Chair Heifets offered an alternative - a blanket exemption for all veterinary research from the requirement on Schedule IIs - but said that would probably be more than they could do. He said he was still trying to understand why they are reviewing schedule II work as it is not driven by veterinary concerns, and who inserted that statutory language. He didn't believe the intention was to regulate animal research in this way.

Panel Member Piomelli said he assumed methamphetamines and amphetamines are the reason, as those are schedule II drugs with some relevance.

Acting Chair Heifets guessed they would need legislation for a blanket exemption for animal schedule II use, but he didn't know how they would go about that. He asked Panel member Piomelli whose input would be needed to determine the scope of their authority.

Panel Member Piomelli said he didn't know and that he liked the suggestion to send a letter to all the Offices of Research in the State of California telling them of the new rule and explaining that RAPC did not make the rule but is now trying to help. They know they use pentobarbital and they could also add etorphine and carfentanil because they are also used in vet contexts. He suggested the Panel doesn't want to be reviewing applications about putting down a horse.

He said he wouldn't want to do that. They could pick those three drugs that are schedule II, and then through the IACUCs and the Office of Research, send RAPC whomever is using it. That way he doesn't think RAPC will get into problems with the letter of the law, but again maybe Panel Member Powell-Willingham would have comments about that. He asked Panel Member Powell-Willingham if she thought they could do this.

Panel Member Powell-Willingham said she would have to take a closer look at it but also determine whether she can advise on such a matter.

Panel Member Piomelli said the proposal that was discussed was quite realistic and helpful.

Panel Member Lee asked whether the IACUC or IRB are asked to communicate directly with RAPC because it was the investigator who was sending RAPC communications from the IACUC or IRB. She said they would need to take that into consideration.

The Executive Officer said the Panel could determine but suggested the Office of Research could collect the list from their IACUCs and then send it to RAPC.

Panel Member Piomelli said the hierarchy is clear with the Office of Research at the top, then the IACUC immediately under it.

Panel Member Lee said if that could happen, that would be best.

Panel Member Piomelli said the Office of Research is the one that makes the decisions.

Acting Chair Heifets asked Panel Member Powell-Willingham, to explore other options, if there is any precedent for RAPC blanket declining to review veterinary schedule II use.

Panel Member Powell-Willingham replied she felt it would not be appropriate to respond here, she could certainly take a look, but it would not happen right now.

Acting Chair Heifets asked whether the intent of inserting Schedule II drugs was that some Schedule II substances are powerful psychoactive drugs that may post some health risks to humans, and so RAPC should regulate them. It didn't have anything to do with veterinary use at all, and they've created an enormous regulatory burden. He asked if there's any mechanism by which RAPC can simply, depending on the language of the statute, decline any veterinary schedule II review.

Panel Member Piomelli responded that the approach Panel Member Heifets is suggesting has two issues; one issue is that he doesn't see it being necessarily any better than the other possibility, and the second is that RAPC would relinquish completely any supervision. He said, not being a lawyer, but having read the statute, he felt that would probably be too much. He gave an example of carfentanil use in horses and if RAPC is not supervising it, the carfentanil ends up in the hands of someone and that someone gets hurt. He said that the Executive

Officer's proposal was flexible and did not impose any burden on the investigators because it is just the IACUC sending protocols that have been approved anyways. He said every animal is killed according to a protocol. He said this was not burdensome and would be easier to implement. He said if they don't need to have Panel Member Powell-Willingham go up the chain of command to figure it out, they could get it done today. He liked Panel Member Heifets' idea, but he was concerned it would not be exactly right according to the letter of the law.

Acting Chair Heifets said they could do both; do this first and then continue the conversation about how to limit or narrow the focus of what schedule II work they are actually overseeing because clearly some of it is just unintentionally broad.

Panel Member Powell-Willingham asked whether at one point there was some drug or drugs that were specifically for veterinary use on animals, but that somehow entered the human market. Panel Member Heifets suggested xylazine and Panel Member Powell-Willingham agreed that was the one.

Acting Chair Heifets replied that there's nothing that RAPC could have done to prevent that, and there's no amount of oversight that could have prevented that.

Panel Member Powell-Willingham said that seems like a fundamental issue that impacts RAPC's ability to do anything, but she is not 100% clear on that.

Acting Chair Heifets suggested they move forward with the waiver at the Office of Research level and asked the Panel whether that sounded like a good plan and if there was anything else to attend to before they go into closed session.

The Executive Officer asked whether the Panel voted on a resolution.

Acting Chair Heifets asked for a vote – he requested a description of the proposal and then the Panel would move to vote on it.

Panel Member Piomelli made a motion: "To resolve, that we issue a waiver to all Institutions in the state of California for pentobarbital, etorphine, and carfentanil, based on the assumption that requiring from the institutions to provide through IACUCs, to RAPC a list of the protocols that make use of such drugs."

Acting Chair Heifets asked for a vote on the motion. After the vote, Panel Member Heifets announced the motion was adopted by a majority vote.

Motion: "To resolve, that we issue a waiver to all Institutions in the state of California for pentobarbital, etorphine, and carfentanil, based on the assumption that requiring from the institutions to provide through IACUCs, to RAPC a list of the protocols that make use of such drugs."

Vote on Motion:

- Boris Heifets - In favor
- James Gasper -Aye
- Judy Aoyagi – In favor
- Kelly Lee – In favor
- Danielli Piomelli – In favor
- April Powell-Willingham – Abstain but thinking about it.

Public comment:

There were no comments from the public.

## CLOSED SESSION

Panel members entered closed session at 2:05 pm under Government Code Section 11126, subd. (c)(20).

## OPEN SESSION

**Meeting Adjournment**

Panel members reentered open session at 3:06 pm and Acting Chair Heifets asked that a quorum be established.

Panel Members present: Boris Heifets, James Gasper, Kelly Lee, Daniele Piomelli, Judy Aoyagi, April Powell-Willingham.

Panel members absent: Chair Jennifer Mitchell

A quorum was established.

The Executive Officer confirmed the next Panel Meeting date of June 19th and at 3:09 pm Acting Chair Boris Heifets adjourned the meeting.

Approved. T.K., June 19, 2026