Consultation Options Assessment

Title:	Rescheduling of Gamma-Butyrolactone (GBL) and 1,4-Butanediol (1,4-BD)
Type of measure:	Tightening of control measures applicable to GBL and 1,4-BD to Schedule 1.
Department or agency:	Home Office
OA number:	HO COA 1025
Contact for enquiries:	GBLConsultation@homeoffice.gov.uk
Date:	16 June 2026

1. Summary of proposal

1) Gamma-Butyrolactone (GBL) and 1,4-Butanediol (1,4-BD) are drugs that are closely related to Gamma-hydroxybutyric Acid ('GHB'). Together, these drugs are referred to as 'GHB and related substances' ('GHBRS'). GHBRS can cause profound unconsciousness and have been used in crimes such as drug-facilitated sexual assault (DFSA), murders, and robberies. Due to a unique exemption from standard drug controls, it is currently lawful to import, export, produce, supply, and possess GBL and 1,4-BD for legitimate use without a licence. Criminals can access GBL and 1,4-BD illegally, imposing high harms and costs on society. Government intervention is proposed to reduce the misuse of GBL and 1,4-BD and harms imposed on society.

2) The Advisory Council on the Misuse of Drugs (ACMD) provided advice relating to the misuse and harms of GHBRS in 2020[1]. It recommended that that GHBRS be moved from Class C to B (implemented April 2022). It also recommended that the government abolish the exemption applicable to GBL and 1,4-BD under regulation 4B of the Misuse of Drugs Regulations 2001 ('the 2001 Regulations') and place them under Schedule 1 of the 2001 Regulations instead. The result of this would have been that industrial users required a licence to import, export, possess, produce or supply GBL and 1,4-BD.

[1] ACMD, 2020. An assessment of the harms of gamma-hydroxybutyric acid (GHB), gamma-butyrolactone (GBL), and closely related compounds. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936953/Final_GHBRS_report_20_November_2020.pdf#:~:text=This%20report%20reviews%20the%20evidence%20of%20harms%20of,prodrugs%2C%20GBL%20and%201%2C4-butanediol%20%281%2C4-BD%29%20in%20%5BACMD%2C%202008a%5D.

3) The then government introduced the Misuse of Drugs (Amendment) (England, Wales and Scotland) Regulations 2021 ('the 2021 Regulations')[2], to meet this recommendation. These were due to come into force on 15 June 2022 but were revoked before then because evidence had emerged that the impact on legitimate industry would be higher than estimated in the impact assessment ('IA') accompanying the regulations[3].

4) The Home Office committed to consult with industry on how best to deliver the ACMD's recommendation without causing disproportionate impacts to business. This consultation seeks views on how to effectively tighten controls on GBL and 1,4-BD, while avoiding a disproportionate negative impact on legitimate industrial use. The government's proposal would require those dealing with high purity GBL and 1,4-BD to obtain a licence to import, export, supply, possess, or produce them, while seeking to ensure that legitimate products made with them remain exempt from licensing.

2. Strategic case for proposed regulation

Licensing of GBL and 1,4-BD

5) GBL and 1,4-BD are central nervous system depressants that are also industrial solvents, used in the manufacturing of many products. These chemicals are being misused as recreational drugs and to commit drugs-facilitated sexual assault (DFSA) and other crimes. Data on the prevalence of their misuse in the UK is limited. The ACMD conducted a review of the available literature on prevalence which found that, overall, the prevalence of misuse is relatively low in the UK but noted the lack of systematic data collection on this.

6) The review found that prevalence increased steadily from 2005 to 2015 and has plateaued since 2015[4]. The prevalence of GHB drug use has decreased in recent years, from 18,000 16 to 59 year olds reporting use of GHB in the last year in 2022/23 to 8,000 in 2023/24[5].

7) ACMD reported that the harms from criminal misuse of GBL and 1,4-BD are significant, including harms from drug-facilitated murder, sexual assault, and robbery. The ACMD concluded that the harms from these crimes are severe and, in the worst cases, result in death. Survivors of DFSA require support from a variety of services for complex and wide-ranging harms. When weaponised, GBL and/ or 1,4-BD can leave the victim in a state of

2 Definition: The 2001 Regulations determine in what circumstances it is lawful to possess, supply, produce, export, and import controlled drugs. The authorised scope of activity will depend on the schedule to which the controlled drug is assigned. There are five schedules. Schedule 1 contains those drugs that are considered to have little or no therapeutic value and are subjected to the most restrictive control. Schedule 5 contains drugs that are considered to have therapeutic value and are commonly available as over the counter medicines.
The regulations can be found here: The Misuse of Drugs (Amendment) (England, Wales and Scotland) Regulations 2021: https://www.legislation.gov.uk/en/uksi/2021/1427/made

3 Home Office, 2022. Circular 004/2022: Gamma-Butyrolactone (GBL) and 1,4-Butanediol (1,4-BD): revocation of rescheduling, GOV.UK. Available at: https://www.gov.uk/government/publications/circular-0042022-gamma-butyrolactone-gbl-and-14-butanediol-14-bd-revocation-of-rescheduling/circular-0042022-gamma-butyrolactone-gbl-and-14-butanediol-14-bd-revocation-of-rescheduling

4 As reported in footnote reference 1.

5 ONS, 2024. Drug misuse in England and Wales – Appendix table. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/drugmisuseinenglandandwalesappendixtable

profound unconsciousness and can cause amnesia. The drug however is rapidly eliminated from the body, making it very difficult to definitively identify in criminal cases.

8) The illicit use of GBL and 1,4-BD imposes costs on wider society. These societal costs include, but are not limited to: the physical and emotional trauma experienced by victims, the costs incurred by the healthcare services used by the victims, and the costs incurred by the criminal justice system (CJS) to bring the criminals to justice. In addition, businesses that produce or supply GBL or 1,4-BD may not take sufficient precautions to reduce the risk of criminal misuse.

9) GBL and 1,4-BD are not placed in a Schedule in the 2001 Regulations. They have a bespoke status, under which it is lawful to import, export, produce, supply, and possess them in circumstances where they are not intended to be used for the purposes of human ingestion, other than as a flavouring in food. However, some suppliers (particularly overseas) market these substances as (for example) purported cleaning products, enabling their purchase for human consumption.

The Consultation

10) As summarised in the **Summary of Proposal**, the then government introduced the 2021 Regulations to meet the ACMD’s recommendation to place GBL and 1,4-BD under Schedule 1 of the 2001 Regulations, but this was revoked prior to implementation because the impact on industry was higher than had been estimated. In particular, Schedule 1 controls would have had the effect that products containing GBL and 1,4-BD (notably inks and coatings) required licences, creating a significantly greater regulatory burden than anticipated as it implies end users rather than just manufacturers would need licences.

11) This consultation Options Assessment (OA) sets out the estimated costs, benefits, and risks of a revised exemption that would subject businesses seeking to import, export, produce, possess, or supply high purity GBL and 1,4-BD to the Home Office licensing regime while exempting mixtures containing them.

12) The consultation aims to improve decision-making by expanding the evidence base regarding the legitimate market for GBL and 1,4-BD. This will be achieved by finding out the market size of the GBL and 1,4-BD industry, the number of producers and the number of customers. The consultation survey will also aim to understand how businesses would respond to an exemption in the legislation relating to products with different concentrations of GBL or 1,4-BD.

3. SMART objectives for intervention

13) The policy objective is to protect UK citizens from the misuse and harmful application of GBL and 1,4-BD. The overarching strategic objective of this intervention is to meet the Home Office objective of reducing crime to improve public safety. This policy intervention will contribute to tackling violence against women and girls[6].

14) The intervention aims to inhibit the ability of criminals and drug users to access GBL and 1,4-BD on the open market. Currently, the conditional exemption for GBL and 1,4-

[6] The Labour Party (2024). Take back our streets. Available at: https://labour.org.uk/change/take-back-our-streets/#vawg

BD is exploited as a loophole. The licensing regime proposed would seek to reduce the ability of criminal consumers to participate in the market, while not preventing legitimate businesses to use GBL and 1,4-BD for industrial purposes.

15) The intended outcomes are restricting access to high purity GBL and 1,4-BD to legitimate users and, concurrently, reducing the quantity of GBL and 1,4-BD available to criminals and drug users. This in turn should decrease the prevalence of criminal misuse for the purposes of committing crimes such as DFSA and murder.

16) These objectives and outcomes are:

   a. **Specific**: The intervention proposed is narrow and targeted to focus on specific concentrations on GBL and 1,4-BD.

   b. **Measurable**: The reduction in the prevalence and misuse of GBL and 1,4-BD will be measurable through the Office for Health Improvement and Disparities (OHID) substance misuse treatment statistics which records the number of adults in treatment for GHB/GBL[7]. Reductions in the relevant offences will be measurable in Police Recorded Crime statistics.

   c. **Achievable**: Clear expectations will be set by the regulation. Policy design and consultation will ensure that impacts do not over-burden industry.

   d. **Realistic**: The government will use the findings of the consultation to identify an appropriate concentration of GBL/1,4-BD for rescheduling that can be applied at the border.

17) **Consultation risk:** There is a risk that not all businesses will respond to the consultation survey, so the results will not be representative of the entire GBL and 1,4-BD market. The Home Office has engaged with the industry in advance to ensure this risk is reduced and will encourage industry bodies to share the consultation with a wide range of affected businesses.

4. Description of proposed intervention options and explanation of the logical change process whereby this achieves SMART objectives

18) Policy options 1 and 2 would both move GBL and 1,4-BD from a bespoke status in the 2001 Regulations to Schedule 1, which will impose the strictest control laws on the two substances. This will introduce a licensing requirement for businesses that import, export, produce, supply, and possess high purity GBL/1,4-BD.

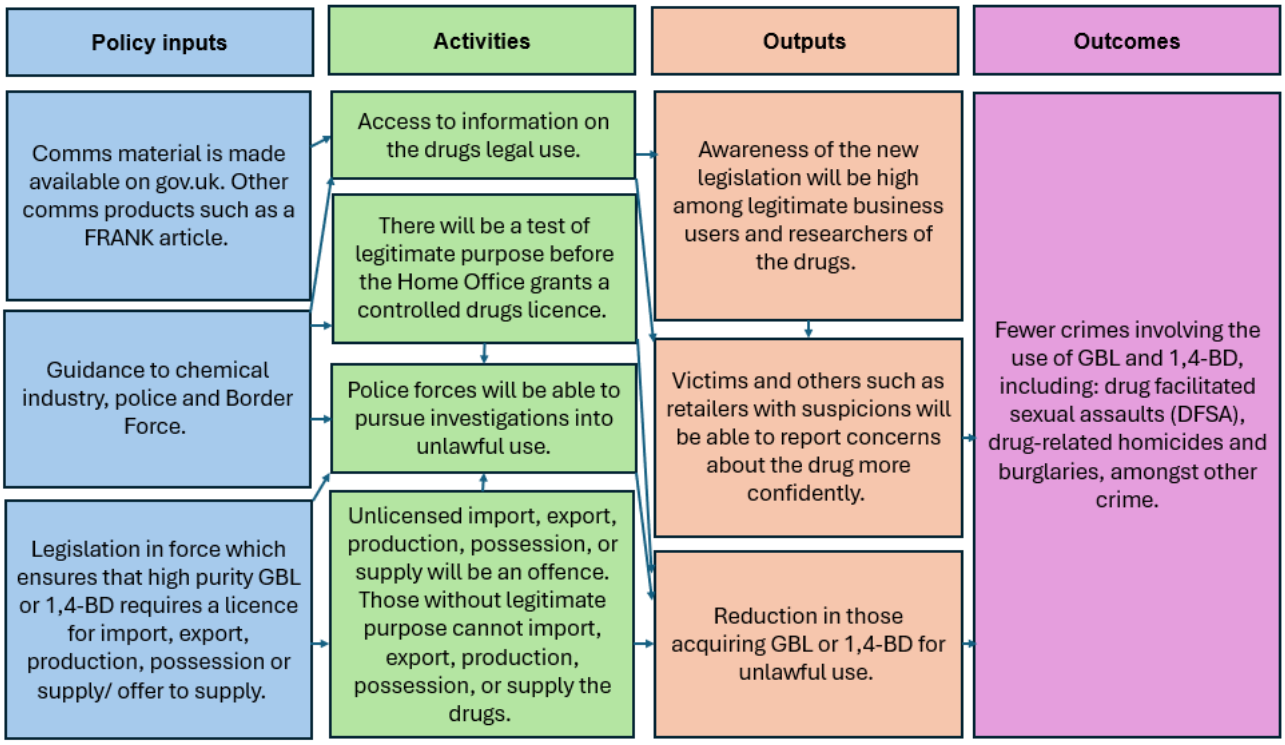
19) This achieves the policy objectives by ensuring people and businesses without a legitimate purpose are unable to import, export, produce, supply, and possess high purity GBL/1,4-BD (because they will not be granted a licence). Communications material and guidance made available to the public and chemical industry will ensure individuals are able to report concerns about the drug more confidently. The legislation in force will allow police forces to pursue investigations into unlawful import, export,

[7] Office for Health Improvement and Disparities. Substance misuse treatment for adults: statistics 2024 to 2025, https://www.gov.uk/government/statistics/substance-misuse-treatment-for-adults-statistics-2024-to-2025

possession, production and supply, thereby reducing the acquisition of GBL/1,4-BD for unlawful use.

20) The theory of change diagram (Figure 1) demonstrates the mechanism by which the policy options will achieve their desired outcomes.

Figure 1: Theory of Change



Note: Talk to FRANK is a government supported website that provides comprehensive guidance on drug use, including associated risks, how to consume drugs safely, and relevant legal information.

5. Summary of long-list and alternatives

21) As set out above, the then government introduced legislation to remove the exemption, which would have made all GBL and 1,4-BD subject to licensing. The legislation was revoked before it came into force[8].

22) The rescheduling of GBL and 1,4-BD for all mixtures irrespective of concentration was therefore the primary option previously considered against the ‘Do nothing’ option which remains the status quo.

23) Following the revocation of the 2021 Regulations, the Home Office committed to consult with industry on how best to deliver the ACMD’s recommendation without causing disproportionate impacts to business.

24) As such, the policy options considered in this consultation OA consider exemptions pertaining to the mixture concentration. The options differ on the concentration threshold of GBL/1,4-BD required to meet licensing thresholds and all options in the

[8] Home Office, 2022. Circular 004/2022: Gamma-Butyrolactone (GBL) and 1,4-Butanediol (1,4-BD): revocation of rescheduling, GOV.UK. Available at: https://www.gov.uk/government/publications/circular-0042022-gamma-butyrolactone-gbl-and-14-butanediol-14-bd-revocation-of-rescheduling/circular-0042022-gamma-butyrolactone-gbl-and-14-butanediol-14-bd-revocation-of-rescheduling

long list are moved forward to the short list. Two options are considered in this analysis, and further alternation to concentration thresholds in policy options will be considered following consultation when impacts to business are better understood.

6. Description of shortlisted policy options carried forward

25) This is a consultation stage OA that considers the rescheduling of GBL and 1,4-BD; this is outlined in Option 1 and Option 2. The government has no preferred option at this stage; however, Option 1 has been more thoroughly explored through stakeholder engagement and is the option that most likely achieves the policy objectives. Option 2 is also a viable means to achieving these objectives and the consultation will seek evidence on the feasibility of Option 2 to aid analysis. These options would both reduce the harms caused by illicit supply and misuse of GBL and 1,4-BD. Rescheduling and placing GBL and 1,4-BD into Schedule 1 of the 2001 Regulations would end the current exemption under which purchasers in the UK can freely purchase GBL and 1,4-BD, which is exploited as a loophole especially through the online sale of purported cleaning products and similar products.

26) It can also make it expensive for legitimate businesses to purchase and distribute products containing GBL and 1,4-BD. The government is consulting to ensure that the impact on legitimate businesses is not disproportionate.

27) The results of this consultation will then be used to establish an exemption which closes the loophole of illegitimate usage while allowing legitimate businesses to continue to operate. The only difference between Option 1 and Option 2 is the percentage of concentration for GBL and 1,4-BD in exempted products. This is explained in further detail in each option below. Three options have been considered:

Option 0: 'Do nothing'

28) This option represents the 'Do nothing' approach whereby no intervention takes place, and the current situation remains. The current criminal and drug misuse of GBL and 1,4-BD will continue.

29) Currently GBL and 1,4-BD are controlled drugs but subject to exemptions that mean that they can be imported, exported, possessed, supplied and produced without a controlled drugs licence as long as they are not for human ingestion (other than a flavouring in food). **In practice, this has allowed the UK consumer to purchase these substances for illicit purposes in the form of purported "cleaning products" and similar products**.

30) Based on the evidence provided by the ACMD[9], laying out the significant harms which GBL and 1,4-BD cause, this option would not be acceptable as access to GBL and 1,4-BD would continue, as would the associated harms of its misuse.

Option 1: Rescheduling of GBL and 1,4-BD adding an exemption for mixtures containing 70 per cent or less GBL or 1,4-BD.

[9] Controlled drugs regulations - GOV.UK (www.gov.uk) – More information on scheduling of drugs, https://www.gov.uk/government/publications/information-about-controlled-drugs-regulations

31) This option involves rescheduling GBL and 1,4-BD under Schedule 1 of the 2001 Regulations. This means that businesses will require a licence to import, export, produce, supply, or possess GBL or 1,4-BD unless it is exempt. The exemption will be:

a. When the concentration of GBL or 1,4-BD in a mixture is 70 per cent or less, as long as the GBL or 1,4-BD is mixed with one or more organic solvents, not including water, ethanol or 1,4-BD (in the case of GBL) or GBL (in the case of 1,4-BD);

b. In all cases (as now), the product must not be intended for human ingestion other than as food flavouring.

32) In this option, businesses seeking to import, export, possess, supply, or produce high purity GBL and 1,4-BD (defined as 70% purity or more) would need to apply for a licence from the Home Office to do so. This licence would impose direct costs to some businesses in the form of application and renewal fees for the licence. There will also be indirect costs, such as administrative costs associated with record keeping; and under certain conditions there will be a requirement for an authorised witness, named on the licence, to be present in the destruction of this substance. This could include, for example, where businesses purchase large quantities of GBL/1,4-BD.

33) The extent of any burden will depend on whether the businesses are currently holders of Home Office controlled drug licences for Schedule 1 drugs and their regulatory preparedness. If businesses are already holders of a controlled drugs licence, then they will not need to apply for one. The burden will also depend upon the activities that the businesses intend to undertake (production and manufacture licences are more expensive than those for possession and supply) and whether they engage in import or export activities.

Option 2: Rescheduling of GBL and 1,4BD adding an exemption for mixtures containing less than 99 per cent GBL or 1,4 BD.

34) This option involves rescheduling 1,4-BD and GBL under Schedule 1 of the 2001 Regulations. This means that businesses will require a licence to import, export, produce, supply, or possess GBL or 1,4-BD unless it is exempt. Exemptions include:

a. When the concentration of GBL/1,4-BD in a mixture is 99 per cent or less, as long as the GBL or 1,4-BD is mixed with one or more organic solvents, not including water, ethanol or 1,4-BD (in the case of GBL) or GBL (in the case of 1,4-BD);

b. In all cases (as now), the product must not be intended for human ingestion other than as food flavouring.

35) Indirect costs will apply for Option 2, as it does for Option 1.

36) The only difference between Option 1 and Option 2 is the concentration threshold where businesses would require a licence. In Option 1 more businesses may require a controlled drug licence than in Option 2. Option 1 may align with the government's aim to reduce the loophole for the illicit supply of GBL/1,4-BD more closely without imposing additional burdens on businesses.

37) **The government does not have a preferred option at this stage, though** Option 1 has been more developed and thoroughly explored through stakeholder engagement at this stage.

38) **In relation to Small-and-Medium sized business impact**, the impacts of the Options 1 and 2 on micro and Small-and-Medium sized businesses (SMBs) are uncertain. The consultation survey aims to find out how many micro and SMBs currently trade/possess/supply GBL or 1,4-BD. The consultation will aid the decision on the most effective exemption to be used for products containing GBL or 1,4-BD.

39) It is important that micro and SMBs are accounted for as they are often most impacted by regulatory change and the requirement of a controlled drugs licence. In early communication with several SMBs, they have outlined that the regulatory change without an exemption would force their operations to close. This would threaten domestic jobs and lead to a more concentrated market with fewer firms having greater dominance in the market. This could result in customers becoming worse off due to reduced options/choice or from higher prices.

7. Monitoring and evaluation

40) Home Office analysts are working with the Office for National Statistics (ONS) to extend the question relating to GHB to include related substances (including GBL) usage into the Crime Survey for England and Wales (CSEW) which will assist in monitoring any changes in trends.

41) Crime reductions regarding rape, sexual assault, homicide and robbery will be monitored through contact with the police and border force and will be maintained to aid the Home Office's consideration of the effects of the legislation.

42) Effects on business will be monitored through continued liaison with industry bodies, including collection of data on the number of licences granted.

8. Minimising administrative and compliance costs

43) Administrative and compliance costs will impact businesses seeking to import, export, produce, supply, or possess non-exempt GBL or 1,4-BD under the selected policy option. The consultation will collect information from affected businesses to assess associated costs.

44) Administrative costs will involve, for example, paying for and obtaining licences and complying with applicable conditions. These have been quantified in the analysis to estimate the impact on businesses, and will be considered in determining the preferred option in the final stage IA following the consultation.

45) Exemptions will ensure these costs do not have a disproportionate effect on legitimate businesses.

Declaration

Department:	Home Office

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Minister responsible:	Sarah Jones

I have read the Consultation Options Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed:

Date: Date 16/06/26

Summary: Analysis and evidence

Price base year: 2026/27

PV base year: 2026/27

	Option 0: Do nothing (baseline)	Option 1: Rescheduling of GBL and 1,4-BD adding an exemption for mixtures containing 70 per cent or less GBL/1,4-BD.	Option 2: Rescheduling of GBL and 1,4-BD adding an exemption for mixtures containing 99 per cent or less GBL/1,4-BD.
Net present social value (with brief description, including ranges, of individual costs and benefits)	NA – no change in relation to baseline	**Central NPSV is estimated to be -£1.43 million,** with low and high estimates ranging between -£0.76 million and -£7.35 million. Several costs have been monetised and discounted over the 10-year appraisal period. The licence and enhanced Disclosure and Barring Service (DBS) checks costs represent an economic transfer where the total cash amount paid by businesses is equal to the cash amount received by the government. An equal value is featured in benefits. In the absence of more specific data, no other benefits have been monetised. GBL and 1,4-BD are difficult to detect in a medical setting after consumption. The misuse of GBL and 1,4-BD is likely to be significantly under-reported and several	**Central NPSV is estimated to be -£1.00 million,** with low and high estimates ranging between -£0.65 million and -£3.45 million. Several costs have been monetised and discounted over the 10-year appraisal period. The licence and enhanced DBS checks costs represent an economic transfer where the total cash amount paid by businesses is equal to the cash amount received by the government. An equal value is featured in benefits. In the absence of more specific data, no other benefits have been monetised. GBL and 1,4-BD are difficult to detect in a medical setting after consumption. The misuse of GBL and 1,4-BD is likely to be significantly under-reported and several factors are likely to be involved in drug-facilitated crimes.

		factors are likely to be involved in drug-facilitated crimes. Descriptions of monetised costs and benefits discounted over the 10-year appraisal period are given below: • **Administrative purchases business cost** (arises from businesses purchasing necessary products to abide to records requirements): £0.02 million (low), £0.03 million (central), £0.09 million (high). • **Business familiarisation cost** (arises from businesses reading guidance): £0.04 million (low), £0.31 million (central), £3.57 million (high). • **Police and Border Force familiarisation cost** (arises from police and border force staff reading guidance): £2,100 (low), £8,400 (central), £29,000 (high). • **Licence cost to business (Economic Transfer – ET):** £0.62 million (low), £0.91 million (central), £2.83 million (high). • **Enhanced DBS checks cost to business (ET):** £0.02 million (low), £0.03 million (central), £0.08 million (high).	Descriptions of monetised costs and benefits discounted over the 10-year appraisal period are given below: • **Administrative purchases business cost:** £0.02 million (low), £0.02 million (central), £0.04 million (high). • **Business familiarisation cost:** £0.03 million (low), £0.21 million (central), £1.67 million (high). • **Police and Border Force familiarisation cost:** £2,100 (low), £8,400 (central), £29,000 (high). • **Licence cost to business (ET):** £0.53 million (low), £0.63 million (central), £1.32 million (high). • **Enhanced DBS checks cost to business (ET):** £0.02 million (low), £0.02 million (central), £0.04 million (high). • **Administrative time business cost:** £0.05 million (low), £0.10 million (central), £0.34 million (high). • **Administrative public sector cost:** £0.54 million (low), £0.65 million (central), £1.36 million (high). • **Licence and enhanced DBS checks fees benefit to public sector (ET):**

		• **Administrative time business cost** (arises from businesses applying for licences and DBS checks): £0.06 million (low), £0.15 million (central), £0.74 million (high). • **Administrative public sector cost** (arises from government processing licences and DBS checks)**:** £0.64 million (low), £0.93 million (central), £2.91 million (high). • **Licence and enhanced DBS checks fees benefit to public sector (ET):** £0.64 million (low), £0.93 million (central), £2.91 million (high).	£0.54 million (low), £0.65 million (central), £1.36 million (high).
Public sector financial costs (with brief description, including ranges)	NA – no change in relation to baseline	Monetised public sector financial costs are negative. There are **monetised public sector financial benefits** which are the cash amount paid by businesses and received by government for licences and enhanced DBS checks. These benefits are estimated to range between **£0.64 million, and £2.91 million**, with a central estimate of **£0.93 million.**	Monetised public sector financial costs are negative. There are **monetised public sector financial benefits** which are the cash amount paid by businesses and received by government for licences and enhanced DBS checks. These benefits are estimated to range between **£0.54 million, and £1.36 million**, with a central estimate of **£0.65 million.**
Significant un-quantified benefits and costs (description, with scale where possible)	NA – no change in relation to baseline	**Costs:** There may be additional administrative and compliance costs to firms to comply with a controlled drugs licence under Schedule 1 of the 2001 Regulations such as increased security, better storage facilities and improved infrastructure. These costs could be substantial enough for some firms to exit the market or discontinue producing or selling products containing GBL/ 1,4-BD.	

		Benefits: A total of 14 deaths were registered in England and Wales in 2021 which mentioned GHB-related poisonings on the death certificate. The cost of a homicide is estimated at £4.50 million and rape at £55,100 (2026/27 prices). The central scenario monetised costs of the policy over the 10-year appraisal period are £2.37 million for Option 1 and £1.66 million for Option 2. These would be offset if one death or four rapes for Option 1, and three rapes for Option 2, were prevented each year. If the interventions decrease the misuse of these drugs there may be reduced healthcare costs, as well as costs of prosecution and subsequent imprisonment of criminals for associated crimes.
Key risks (and risk costs, and optimism bias, where relevant)	NA – no change in relation to baseline	• **Volume of businesses impacted** may be underestimated where businesses are not currently aware of the proposed legislative change. This risk is accounted for in scenario analysis. The consultation aims to address these gaps and the necessary modifications to this appraisal will be made in the final-stage IA to reflect the consultation's findings. • **Some compliance costs remain non-monetised** where businesses may need to make infrastructure changes at their sites and ensure there is sufficient safe storage. Depending on whether the business already has experience in handling similar chemicals and its size, these costs may be minimal and unlikely to impact on the NPSV/BNPV. The consultation aims to test this assumption and the necessary modifications to this appraisal will be made in the final-stage IA to reflect the consultation's findings. • **Number of businesses required to obtain an import consignment** licence is uncertain. It is not known whether the number of businesses will change post-implementation. Some business will be more likely to consolidate small import orders. This is a practice that is likely already occurring in the industry. Given awareness of this analytical risk Home Office analysts will seek to improve this analysis post-consultation.

Results of sensitivity analysis	NA – no change in relation to baseline	**Break-even analysis** Break-even analysis has been undertaken using the unit costs for homicide, rape, and other sexual offences. The offences selected do not cover the full range of crimes facilitated by the misuse of GBL and/or 1,4-BD. In practice, a combination of these offences is facilitated by GBL/1,4-BD, however break-even analysis in the **central scenario** is used to give a sense of the extent of harms against the monetised costs. • **0.5 homicide offences;** • **40 rape offences;** • **or 260 other sexual offences** would need to be prevented over a 10-year period to offset monetised costs in the central scenario.	**Break-even analysis** Break-even analysis has been undertaken using the unit costs for homicide, rape, and other sexual offences. The offences selected do not cover the full range of crimes facilitated by the misuse of GBL and/or 1,4-BD. In practice, a combination of these offences is facilitated by GBL/1,4-BD, however break-even analysis in the **central scenario** is used to give a sense of the extent of harms against the monetised costs. • **0.4 homicide offences;** • **30 rape offences;** • **or 180 other sexual offences** would need to be prevented over a 10-year period to offset monetised costs in the central scenario.

Annex

A. Evidence Base

1. The appraisal in this section aims to build on related previous analysis from 2021[10] and estimate the impacts to businesses and society. This consultation OA seeks to identify and, where possible, mitigate against any analytical risks. The purpose of the consultation is to expand the evidence base regarding the legitimate market for GBL and 1,4 BD. The Home Office will produce a final IA, informed by the findings of the consultation, before a decision is made on what action to take.
2. **On proportionality**, the analysis in this consultation OA contains best estimates for the costs and benefits of the policy options considered. Every effort has been made to ensure the analysis presents the best estimate of the likely impact of the options, given the time, resource and data available. These are quantified where data is available, with risks highlighted in Section 5. This is a proportionate effort to appraise the policy options considered.
3. The estimates provided in this OA will be reviewed following consultation responses to ensure they capture the impact on businesses as accurately as possible.

General Assumptions and Data

4. The main assumptions and data sources used in this consultation OA are listed below, with more detail on the cost and benefit assumptions given in the relevant sections. The net present social value (NPSV) is estimated over 10 years using a 3.5 per cent discount rate, in line with HM Treasury Green Book guidance[11]. The appraisal starts in the financial year 2026/27, with costs also presented in this year.
5. The effects of each option considered are modelled relative to the counterfactual 'do nothing' baseline. In essence, an option's costs and benefits are those that only exist because of that option being chosen over doing nothing, with Option 0 having zero costs and zero benefits by definition. The modelling compares the impact of tightening controls on GBL and 1,4-BD compared to GBL and 1,4-BD remaining subject to their current wide-ranging exemption.
6. Due to the small differences in the interventions and uncertainty regarding the number of businesses impacted at this stage, the costs and benefits for Option 1 and Option 2 are similar, with the difference driven by the number of businesses impacted.
7. The equivalent annual net direct cost to business (EANDCB) will be referred to as the **net cost to business per year** throughout this appraisal section. This cost refers to the **annual cost**, not the full 10-year appraisal period.
8. Monetised estimates are rounded to the nearest hundred or to two decimal places if presented in £ millions, unless otherwise stated.

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[10] Impact Assessment: Rescheduling of Gamma-Butyrolactone (GBL) and 1,4-Butanediol (1,4-BD) and reclassification of GHB and related substances (GHBRS), HO0399, legislation.gov.uk, https://www.legislation.gov.uk/ukia/2022/32/pdfs/ukia_20220032_en.pdf

[11] Green Book (2026), Available at: https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government

9. Where a business needs a controlled drug licence, they are only required to make one application per site (not each activity individually) and a fee is payable for the licence. A simplifying assumption has been made that businesses operate out of only one site and are only required to make one application. This assumption will be tested under consultation and reviewed before a Final Impact Assessment is produced.

10. There is significant uncertainty regarding the number of businesses that will require domestic controlled drug licences and import or export licences following the proposed change. The consultation aims to address these gaps. Not all costs have been monetised, such as all potential costs on businesses to comply with the proposed licence rules. Ranges are driven by the uncertainty around businesses impacted. The details of the exemption will be determined following consultation.

Monetised impacts

Costs

Volumes: Number of businesses impacted

11. In **Option 1**, businesses that import, export, produce, possess or supply products containing GBL or 1,4-BD at 70 per cent or above concentration will be required to obtain a controlled drugs licence. Currently, 98 businesses have already applied for a controlled drugs licence in anticipation of the rescheduling of GBL and 1,4-BD without any exemption[12]. This forms the basis for the central scenario.

12. The analysis assumes that 30 per cent of the 98 businesses that have applied for a licence engage in activities that may fall under an exemption[13], leading to an estimate of 69 businesses affected in the low scenario. A high estimate of 294 businesses (three times the central estimate) is used to represent the uncertainty regarding the number of businesses who are unaware and/or have not previously contacted the Home Office.

13. In summary, **Option 1** estimates that **between 69 and 294 businesses will be impacted, with a central estimate of 98.**

14. As **Option 2** would affect only businesses that import, export, produce, possess or supply GBL or 1,4-BD at 99 per cent or above concentration, the central scenario estimates 69 businesses that would be affected by the licensing. A range between 58 to 137 displays uncertainty around firms exiting the market and/or the businesses that currently have not applied for a licence but may require one. The low estimate of 58 businesses accounts for firms that may choose to exit the market given the costs of the controlled drugs licence, where 15 per cent of applications in progress are expected to be withdrawn following consultation.

15. The high estimate of 137 firms (two times the central estimate) accounts for the firms that still have not applied for licence yet and those businesses that may not know about the legislative change. The high estimate in **Option 2** is smaller as from early conversations with businesses and industries, the exemption included may affect a smaller number of businesses.

[12] Home Office internal estimate. Data relating to imports, exports, and other available licences for GBL and 1,4-BD was collated from Home Office data, site visits and meeting with businesses.

[13] Home Office internal estimate. This is an assumption based on current licence applications received by the Home Office.

16. In summary, **Option 2** estimates that **between 58 and 137 businesses will be impacted, with a central estimate of 69.**

17. **Assumptions:**

    a. Both assessments assume no material change in the number of licences required each year. Full compliance with the licensing regime is also assumed.

    b. The businesses identified are situated in England, Wales, and Scotland. No businesses have been identified to be operating in Northern Ireland.

    c. Volumes are kept constant over the 10-year appraisal period.

18. The volume of businesses affected will be reassessed post-consultation.

Set-up costs (Private and Public)

Cost 1: Administrative (purchasing) costs for businesses

19. Under the 2001 Regulations, Schedule 1 substances may only be produced, supplied or possessed under a Home Office licence. Licence holders must have records kept relating to quantities, and any missing amounts of drugs. Additional information such as the levels of stock, quantities produced, and quantities destroyed must also be recorded and accounted for. They will also need to meet storage and security conditions. The administrative costs of these processes will be imposed on businesses.

20. The cost assumptions include businesses purchasing a register (around £35), a CCTV camera (up to £230) and purchase/make padlock access taps (around £55)[14]. The unit cost per business is estimated to be **£320**[15] (2026/27 prices). This cost estimate is multiplied by the volumes of businesses impacted for each of the options. It is acknowledged that some businesses may already own these items, so the costs may be overestimated in the analysis.

21. **Option 1:** It is estimated that administrative purchasing costs will range between **£22,100 and £94,600,** with a central estimate of **£31,500** (2026/27 PV) in year 1 only.

22. **Option 2:** It is estimated that administrative purchasing costs will range between **£18,800 and £44,200,** with a central estimate of **£22,100** (2026/27 PV) in year 1 only.

Cost 2: Familiarisation costs to the public sector and businesses

23. The familiarisation cost estimates cover guidance for the public sector (police and Border Force officers) and businesses, who will need to familiarise themselves with the changes to the rescheduling of GBL and 1,4-BD. Familiarisation costs are the opportunity cost to businesses and organisations of the time spent reading and comprehending new guidance / legislation issued. Familiarisation costs are incurred in year 1 of implementation and no further familiarisation costs are calculated over the 10-year appraisal period. It is likely that new staff will familiarise themselves over that time and these costs may be underestimated. Familiarisation costs are estimated as:

    Time taken to read the guidance x wage rate x volume of people reading

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[14] Estimates provided by Home Office operational colleagues, based on company visits.

[15] Value uplifted from 2022/23 prices (£280) into 2026/2027 Prices, using GDP deflators at market prices. Source: HM Treasury, https://assets.publishing.service.gov.uk/media/69cbaf242d120d9d5ec0f2fd/GDP_Deflators_Qtrly_National_Accounts_March_2026_update.xlsx

24. **Public sector assumptions:** A previous Home Office circular[16], which conveys regulatory changes relevant to reclassification and rescheduling, is used as a proxy for the length of guidance, producing an estimate of 2,200 words. At a central reading speed estimate of 400 words per minute, with a range of 200 to 700 words per minute,[17] it is estimated that it will take between 4 and 17 minutes to read the guidance, with a central estimate of 7 minutes. Median gross hourly wage data by occupation published by the ONS[18] is selected for senior police officers (£31 per hour, 2026/27 prices) and uplifted by 22 per cent for public sector workers to account for non-wage costs[19].

25. In the absence of more specific data, between 5 and 15 senior officers[20], with a central estimate of 10, are assumed to be required to read and understand the changes in each of the 45[21] police force areas and 140 Border Force suites[22]. This range is selected in the absence of any other evidence of how many officers would need to read the guidance.

26. **Businesses assumptions:** Existing licensing guidance has been identified by policy colleagues as the guidance businesses will be required to read[23,24,25,26]. The total length of the guidance documents is 11,300 words. In the absence of more specific data, it is assumed that affected businesses do not currently hold a Schedule 1 licence for other drugs and will have no prior knowledge, although this may be an overestimate of familiarisation costs.

27. The reading time estimates are the same as for public sector familiarisation. Median wage data for Business, Research and Admin Professionals (£25 per hour, 2026/27 prices)

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16 Home Office, 2024. Guidance for Home Office Controlled Drug Licensing Annual Returns. Available from: https://assets.publishing.service.gov.uk/media/67655441ff2c870561bde94a/Annual+Returns+-+Updated+Guidance+2024+FINAL.pdf

17 Words per minute estimates for paper and screen reading, Readingsoft. Available here: http://www.readingsoft.com/. This is using words per minute estimates of 200, 400 and 700.

18 Earnings and hours worked, occupation by four-digit SOC: ASHE Table 14.5a - Office for National Statistics (ons.gov.uk), https://www.ons.gov.uk/file?uri=/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/occupation4digitsoc2010ashetable14/2024provisional/ashetable142024provisional.zip

19 Index of Labour Costs per Hour, non-seasonally adjusted - Office for National Statistics (ons.gov.uk), https://www.ons.gov.uk/file?uri=/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/indexoflabourcostsperhourilchseasonallyadjusted/current/ilchtablestemplatesa1.xls

20 A Senior Officer is an officer who leads a team of offices within a force.

21 Includes Northern Ireland and Scotland Police Forces

22 Media factsheet: Border Force, Home Office, https://homeofficemedia.blog.gov.uk/2019/11/04/media-factsheet-border-force/

23 Home Office, 2025. Guidance on Controlled Substance Domestic Application and Case Processing. Available here: https://assets.publishing.service.gov.uk/media/68834cc81e72aed40611aee4/Application+and+process+guide-+Domestic+Licensing-+July+2025+v1.4.pdf

24 Home Office, 2025. Guidance on Controlled Drugs: standard operating procedures guidelines. Available here: https://www.gov.uk/government/publications/guidelines-for-standard-operating-procedures/guidelines-for-standard-operating-procedures

25 Home Office, 2022. Security guidance for all existing or prospective Home Office controlled drug licensees and/or precursor chemical licensees or registrants. Available here: https://assets.publishing.service.gov.uk/media/63a1b6c8e90e075874d91825/Security_Guidance_for_all_Businesses_and_Other_Organisations_v1.5_Nov_2022.pdf

26 Home Office, 2024. Guidance on Home Office controlled drug licensing annual returns. Available here: https://assets.publishing.service.gov.uk/media/67655441ff2c870561bde94a/Annual+Returns+-+Updated+Guidance+2024+FINAL.pdf

is used[27] to reflect the wages of administrative personnel, uplifted by 17 per cent for private sector workers to account for non-wage costs[28].

28. In the absence of more specific data, between one and five workers per business, with a central estimate of three, are assumed to need to read and understand the guidance. This figure is used as a point estimate given the majority of these businesses are medium or large firms. These were then applied to the estimated volumes of businesses impacted in Options 1 and 2.

29. **Police and Border Force (public sector) familiarisation** is estimated to range between **£2,100 and £29,000,** with a central estimate of **£8,400** (2026/27 PV) in year 1 only**.** This cost is the same for Option 1 and Option 2.

30. **Business familiarisation for Option 1** is estimated to range between **£0.04 million and £3.57 million,** with a central estimate of **£0.31 million** (2026/27 PV) in year 1 only.

31. **Business familiarisation for Option 2** is estimated to range between **£0.03 million and £1.67 million,** with a central estimate of **£0.21 million** (2026/27 PV) in year 1 only.

Total set-up cost

32. **Option 1:** Total set-up costs for Option 1 are estimated to range between **£0.06 million and £3.70 million** (2026/27 prices), with a central estimate of **£0.35 million** in year 1 only.

33. **Option 2:** Total set-up costs for Option 2 are estimated to range between **£0.05 million and £1.74 million** (2026/27 prices), with a central estimate of **£0.25 million** in year 1 only.

Ongoing costs (Private and Public)

Cost 3: Licensing costs to possess, supply or produce controlled drugs (economic transfer)

34. There are four 'activities' which require a domestic license that businesses may need to apply for and maintain each year. They only need to make one application per site and a fee is payable for the licence, not each activity individually. These four licence activities are:

    - a licence to possess controlled drugs,
    - a licence to supply, or offer to supply controlled drugs,
    - a licence to produce preparations containing controlled drugs and,
    - a licence to produce controlled drugs.

35. The type of licence a business will require under the new regime will depend on the activities of the company. This consultation OA recognises that there are no licence fees in Northern Ireland. Any business costs for Northern Irish businesses would be purely administrative in nature. Given no businesses in Northern Ireland were initially identified, this has no impact on the analysis.

[27] Earnings and hours worked, occupation by four-digit SOC: ASHE Table 14.5a - Office for National Statistics (ons.gov.uk), https://www.ons.gov.uk/file?uri=/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/occupation4digitsoc2010ashetable14/2024provisional/ashetable142024provisional.zip

[28] Index of Labour Costs per Hour, non-seasonally adjusted - Office for National Statistics (ons.gov.uk), https://www.ons.gov.uk/file?uri=/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/indexoflabourcostsperhourilchseasonallyadjusted/current/ilchtablestemplatesa1.xls

36. A business requires only one licence to carry out an activity for multiple controlled drugs, meaning a business would only need to possess one licence to supply, possess or produce GBL and/or 1,4-BD. If a business already held a licence for Schedule 1 drugs, they would not need to apply for another for GBL or 1,4-BD. In rare cases, licence holders may need to apply to adjust conditions on renewal, but relevant conditions are generally limited to specific drugs and unlikely to affect businesses handling GBL or 1,4-BD. If a business already holds a Home Office controlled drugs licence for another scheduled substance (for example, a Schedule 2 licence), then they would need to obtain a Schedule 1 licence to handle GBL or 1,4-BD at the same site. An additional Schedule 1 licence fee is expected to be £1,371 per site[29].

37. Based on operational colleagues' intelligence from the industry, it is understood that none of the businesses which deal with GBL or 1,4-BD currently possess a Home Office controlled drugs licence. These businesses will need to pay for at least one licence in full. Some businesses do have 'Drug Precursor Chemical' licences and whilst this does not impact the fees that would be payable by businesses as these licences are a different type, they would have a degree of regulatory preparedness meaning a business 'set up' cost for the licence would likely be lower, as less 'regulatory learning' is likely needed.

38. One licence is required per site that does not currently own any other controlled drugs licence. The analysis assumes all affected businesses only have one site and will pay for one licence. The maximum licence issue fee that a business will have to pay for a site is £4,700[30]. Some firms may have multiple sites which they will be required to apply for a licence for each, and this may present an underestimate.

39. Each year the business must pay £326 to renew the licence provided the business does not require a site visit. If a site visit is required, the fee is £1,371. A site visit is needed on average once every four years. If a business is not compliant their licence will be revoked, and they will be unable to renew. There is no additional cost associated with revocation. The analysis assumes that no licenses are revoked as this is assumed to be a rare circumstance.

40. The licence costs are as follows, where each business will pay the maximum application fee in year 1, a site visit fee every 4 years, and a maintenance fee every year in between. The cost schedule for a single business is displayed in Table 1:

Table 1: Licence cost to possess, supply and produce controlled drugs, £, PV, 2026/27 prices.

Appraisal year	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**
Licence cost (£)	4,700	300	300	300	1,200	300	300	300	1,000	200

Source: Home Office estimates, 2025. Discounted over a 10-year period. Estimates rounded to nearest hundred.

41. The licensing costs for both options are treated as economic transfers because the licence price is assumed to be set at a level where it recovers all costs of processing the licence. As

29 Controlled Drugs and Precursor Chemicals: License Fees, Home Office, 2019, Controlled drugs and precursor chemicals: licence fees - GOV.UK (www.gov.uk) , https://www.gov.uk/guidance/controlled-drugs-licence-fees

30 Controlled drugs and precursor chemicals: licence fees - GOV.UK (www.gov.uk), https://www.gov.uk/guidance/controlled-drugs-licence-fees

such, the cash amount paid by the licensee if equal to the cash amount received by the government. The equal amount received by the government is included as a monetised benefit, and the economic transfer is cancelled out in the overall estimate of Net Present Social Value (NPSV)[31]. These amounts are included to reflect the financial burden to the licensee in the cost to business which contribute to the Business Net Present Value (BNPV) estimates.

42. The licensing costs are multiplied by the estimated volume of businesses impacted for each option to obtain the licencing costs to business.

43. **Option 1:** Licencing costs to business for Option 1 are estimated to range between **£0.61 million and £2.61 million** (2026/27 prices), with a central estimate of **£0.87 million** over the 10-year period (PV)[32]. These costs are an economic transfer so cancel out in the NPSV for Option 1.

44. **Option 2:** Licencing costs to business for Option 2 are estimated to range between **£0.52 million and £1.22 million** (2026/27 prices), with a central estimate of **£0.61 million** over the 10-year period (PV)[33]. These costs are an economic transfer so cancel out in the NPSV for Option 2.

Cost 4: Licensing costs to import and export controlled drugs (economic transfer)

45. A firm seeking to import or export-controlled drugs must pay a £24 fee for a single consignment. A single consignment may be of any size. All these consignments are imports as discussions with industry and the licensing team suggest no exports of GBL or 1,4-BD are expected.

46. In the absence of more specific data, between 10 to 20 per cent of the volumes of business, with a central estimate of 15 per cent, affected are assumed to import, based on internal conversations with Home Office operational colleagues. These businesses are typically brokers that will import 100 per cent of their business. It is not known whether this will change post-consultation / implementation. Some businesses will be more likely to consolidate small import orders. This is a practice that is likely already occurring in industry.

47. For illustrative purposes, a range of 6 to 18 import consignments annually, with a midpoint of 12 has been agreed by Home Office Operational colleagues to demonstrate the scale of this cost. This range was used in the absence of any other available evidence, and the number of important consignments each business makes per year will vary depending on the size of the firm.

48. As per paragraph 41, import and export consignment licences are also an economic transfer and feature an equal government revenue benefit in paragraph 67. The economic transfer is cancelled out in the NPSV but does contribute to BNPV.

49. **Option 1:** Import licencing costs to business for Option 1 are estimated to range between **£8,500 and £218,600** (2026/27 prices), with a central estimate of **£36,400** over the 10-year

[31] Green Book (2022), Section 6.3, Available at: https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-governent/the-green-book-2020

[32] 10-year cost discounted by 3.5 per cent each year and inflated to show present value and real prices. https://www.gov.uk/government/publications/green-book-supplementary-guidance-discounting

[33] 10-year cost discounted by 3.5 per cent each year and inflated to show present value and real prices. https://www.gov.uk/government/publications/green-book-supplementary-guidance-discounting

period (PV)[34]. These costs are an economic transfer so cancel out in the NPSV for Option 1.

50. **Option 2:** Import licencing costs to business for Option 2 are estimated to range between **£7,200 and £102,000** (2026/27 prices), with a central estimate of **£25,500** over the 10-year period (PV)[35]. These costs are an economic transfer so cancel out in the NPSV for Option 2.

Cost 5: Enhanced Disclosure and Barring Service (DBS) checks (economic transfer)

51. An additional requirement to obtain a controlled drugs licence is that the licence holder has at least one enhanced DBS check. These cost £50 each and need to be renewed after three years, after which businesses must apply again, unless they have subscribed to the update service. Costs are split evenly across the three years.

52. In visits to some of these businesses, Home Office operational colleagues found that firms would need between one and four enhanced DBS checks, so an average of two DBS checks per business was used. These are applied to the estimated volumes of businesses impacted in Options 1 and 2.

53. As per paragraph 41, enhanced DBS checks are also an economic transfer and feature an equal government revenue benefit in paragraph 67. The economic transfer is cancelled out in the NPSV but does contribute to BNPV.

54. **Option 1:** Enhanced DBS costs to business for Option 1 are estimated to range between **£19,500 and £83,500** (2026/27 prices), with a central estimate of **£27,800** over the 10-year period (PV)[36]. These costs are an economic transfer so cancel out in the NPSV for Option 1.

55. **Option 2:** Enhanced DBS costs to business for Option 2 are estimated to range between **£16,600 and £39,000** (2026/27 prices), with a central estimate of **£19,500** over the 10-year period (PV)[38]. These costs are an economic transfer so cancel out in the NPSV for Option 2.

Cost 6: Administrative (time) costs for businesses

56. Businesses will incur additional administrative costs from filling in the required paperwork to obtain and renew a controlled drug licence, import and export licences if required, and enhanced DBS checks. Information on Standard Operating Procedures (SOP) may also be required[37]. These represent an opportunity cost to businesses of the time spent undertaking administrative tasks.

57. Low, central and high estimates of the duration of time required to apply for and renew a controlled drugs licence were calculated based on information provided by Home Office operational colleagues. Assuming basic IT literacy and the business already adopts ‘good’ audit and standard Health and Safety practices[38], the duration of employer’s time required for an individual business to apply for a controlled drugs

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34 10-year cost discounted by 3.5 per cent each year and inflated to show present value and real prices. https://www.gov.uk/government/publications/green-book-supplementary-guidance-discounting

35 10-year cost discounted by 3.5 per cent each year and inflated to show present value and real prices. https://www.gov.uk/government/publications/green-book-supplementary-guidance-discounting

36 10-year cost discounted by 3.5 per cent each year and are corrected for inflation show present value and real prices. https://www.gov.uk/government/publications/green-book-supplementary-guidance-discounting

37 Domestic licensing: application guidance, gov.uk, https://www.gov.uk/government/publications/domestic-licensing-application-guidance/domestic-licensing-application-guidance-accessible-version

38 Auditing and reporting: Leading health and safety at work, HSE, https://www.hse.gov.uk/leadership/auditing.htm

licence ranges from three to eight hours, with a central estimate of five hours. Administration costs for DBS check applications and renewals are incurred every three years, and it is assumed the time taken for a renewal is equivalent to the initial application. This is estimated to be between one and four hours with a central estimate of two hours[39].

58. The analysis assumes that businesses will allocate one employee to the administrative task of applying for and renewing licenses and DBS checks. The time required per business is multiplied by the median gross hourly pay for Business, Research and Admin Professionals (£26 per hour, 2026/27 prices)[40], and the volumes of businesses impacted for each of the options. Hourly pay is adjusted to account for non-wage labour costs, estimated to be 17 per cent for private sector workers[41].

59. Administrative (time) costs are estimated as follows:

*Time taken to complete administrative tasks * wage rate adjusted for non-wage labour costs * volume of staff undertaking tasks*

60. **Option 1:** It is estimated that administrative time costs will range between **£0.06 million and £0.74 million,** with a central estimate of **£0.15 million** (2026/27 PV).

61. **Option 2:** It is estimated that administrative time costs will range between **£0.05 million and £0.34 million,** with a central estimate of **£0.10 million** (2026/27 PV).

Cost 7: Administrative costs for public sector

62. For the required licences and enhanced DBS checks for businesses, government resource will be required to process the licenses, checks, and carry out any relevant investigations including site visits. It is assumed that all fees are set on a cost recovery basis, as confirmed by relevant Home Office colleagues. The cost of the fees is equal to the cost to government of processing and resourcing the licence applications, including for import and export licenses (Costs 3 and 4), and the enhanced DBS checks (Cost 5). Assumptions for the number of licenses and checks required per businesses are the same as for Costs 3, 4, and 5.

63. **Option 1:** Administrative costs for public sector for Option 1 are estimated to range between **£0.64 million and £2.91 million** (2026/27 prices), with a central estimate of **£0.93 million** over the 10-year period (PV)[38].

64. **Option 2:** Administrative costs for public sector for Option 2 are estimated to range between **£0.54 million and £1.36 million** (2026/27 prices), with a central estimate of **£0.65 million** over the 10-year period (PV)[38].

Total Costs

65. **Option 1:** Total monetised costs for Option 1 are estimated to be between **£1.40 million and £10.26 million**, with a central estimate of **£2.37 million** (2026/27 PV) over 10 years.

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39 Internal estimate supplied by Home Office operational colleagues

40 Earnings and hours worked, occupation by four-digit SOC: ASHE Table 14.5a - Office for National Statistics (ons.gov.uk), https://www.ons.gov.uk/file?uri=/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/occupation4digitsoc2010ashetable14/2024provisional/ashetable142024provisional.zip

41 Index of Labour Costs per Hour, non-seasonally adjusted - Office for National Statistics (ons.gov.uk), https://www.ons.gov.uk/file?uri=/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/indexoflabourcostsperhourilchseasonallyadjusted/current/ilchtablestemplatesa1.xls

These are formed of set-up costs to the public sector (police and Border Force) and businesses, and ongoing costs to business.

66. **Option 2:** Total monetised costs for Option 2 are estimated to be between **£1.19 million and £4.81 million**, with a central estimate of **£1.66 million** (2026/27 PV) over 10 years. These are formed of set-up costs to the public sector (police and Border Force) and businesses, and ongoing costs to business.

Benefits

Benefit 1: Government revenue from licence and DBS check fees

67. The only monetised benefit is the government revenue from licensing and DBS check fees. As explained in paragraph 41, the licensing fees and enhanced DBS check fees represent an economic transfer where the fees paid by businesses are equal to the cash amount received by the government.

68. **Option 1:** Government revenue from licence and DBS check fees is estimated to range between **£0.64 million** and **£2.91 million,** with a central estimate of **£0.93 million** (2026/27 PV) over 10 years.

69. **Option 2:** Government revenue from licence and DBS check fees is estimated to range between **£0.54 million** and **£1.36 million,** with a central estimate of **£0.65 million** (2026/27 PV) over 10 years.

70. It is possible to reliably estimate and monetise any other potential benefits associated with the options considered due to insufficient data. GBL and 1,4-BD are difficult to detect in a medical setting after consumption. The misuse of GBL and 1,4-BD is likely to be significantly under-reported and several factors are likely to be involved in drug-facilitated crimes.

71. The costs of the misuse of GBL and 1,4-BD are expected to be large and significant when used in facilitating crime. These include the costs to victims of drug-facilitated sexual assault, rape, robbery, and homicide. The following break-even analysis has been undertaken to represent the scale of the harm of these crimes against the costs.

72. There are also several non-monetised benefits detailed from paragraph 89.

Sensitivity Analysis - Breakeven Analysis

73. A breakeven analysis is conducted to illustrate the scale of the benefits required to offset the economic costs. The analysis shows the number of the crimes commonly associated with the misuse of GBL and 1,4-BD which must be avoided for the regulatory change to breakeven. If any further crimes are avoided over and above this breakeven point, then the regulations will have provided a net benefit to society. It is important to note that whilst GBL and 1,4-BD facilitate a range of crimes, they are not the sole driver, and these crimes may still happen in the absence of the drugs. Breakeven analysis is carried out with the assumption that at least some crimes would not occur without the availability of GBL and 1,4-BD.

74. For **Option 1, on average just over four rapes (4.30) must be avoided per year** because of this regulatory change for the intervention to provide a net societal benefit if assessment is based solely on this benefit. This is because a rape imposes many different costs on society, for example, costs to the healthcare system, mental health, and policing costs. If just **one homicide (0.53) is avoided over 10 years** because of this regulatory change, this intervention will not only recover the costs of this intervention

but will also provide significantly greater benefits than the cost. This is because the cost avoided due to a prevented homicide is £4.50 million (2026/27 prices).

75. For **Option 2, similarly on average just over three rapes (3.01) must be avoided per year**. Alternatively, if just **one homicide (0.37) is avoided over 10 years** because of this regulatory change, this intervention will not only recover the costs of this intervention but will also provide significantly greater benefits than the cost.

Overall

Total costs and benefits, NPSV, BNPV and net cost to business

Option 1

76. Total monetised costs are estimated to be between **£1.40 million to £10.26 million**, with a central estimate of **£2.37 million** (2026/27 PV) over 10 years. These are formed of set-up and ongoing costs to the public sector and businesses, including licence and DBS check fees paid by businesses. Total monetised benefits are estimated to be between **£0.64 million** and **£2.91 million**, with a central estimate of **£0.93 million**. These are the government revenue generated from licence and DBS check fees.

77. The net present social value (NPSV) is estimated to be between **– £0.76 million** and **-£7.35 million**, with a central estimate of **-£1.43 million**. However, the lack of other monetised benefits means this does not accurately reflect the overall benefits of the policy option.

78. The business net present value (BNPV) is estimated to be between **–£0.76 million** and **-£7.32 million**, with a central estimate of **-£1.42 million**.

79. The net cost to business per year (EANDCB) is estimated to be between **–£75,900** and **-£732,000**, with a central estimate of **-£142,200.**

Option 2

80. Total monetised costs are estimated to be between **£1.19 million to £4.81 million**, with a central estimate of **£1.66 million** (2026/27 PV) over 10 years. These are formed of set-up and ongoing costs to the public sector and businesses, including licence and DBS check fees paid by businesses. Total monetised benefits are estimated to be between **£0.54 million** and **£1.36 million**, with a central estimate of **£0.65 million**. These are the government revenue generated from licence and DBS check fees.

81. The net present social value (NPSV) is estimated to be between **–£0.65 million** and **-£3.45 million**, with a central estimate of **-£1.00 million**. However, the lack of other monetised benefits means this does not accurately reflect the benefits of the policy option.

82. The business net present value (BNPV) is estimated to be between **–£0.65 million** and **-£3.42 million**, with a central estimate of **-£1.00 million**.

83. The net cost to business per year (EANDCB) is estimated to be between **–£64,500** and **-£341,600,** with a central estimate of **-£99,500.**

Table 2: Option 1 - Summary costs, benefits, NPSV, BNPV and EANDCB £ million (PV), 10 years, 2026/2027 prices.

Summary of Costs and Benefits	**Low**	**Central**	**High**
Total set up costs	0.06	0.35	3.70
Private sector set up costs	0.06	0.34	3.67
Public sector set up costs	0.00	0.01	0.03
Total ongoing costs	1.34	2.02	6.57
Private sector ongoing costs	0.70	1.08	3.65
Public sector ongoing costs	0.64	0.93	2.91
Total costs	**1.40**	**2.37**	**10.26**
Private sector benefits	-	-	-
Public sector benefits	0.64	0.93	2.91
Total benefits	**0.64**	**0.93**	**2.91**
Net Present Social Value	-0.76	-1.43	-7.35
Business Net Present Value	-0.76	-1.42	-7.32
Net Cost to Business (EANDCB)	-0.08	-0.14	-0.73

Source: Home Office estimates, 2025. £ million estimates rounded to 2 decimal places (unless less than +/- £0.005 million).

Table 3: Option 2 - Summary costs, benefits, NPSV, BNPV and EANDCB £ million (PV), 10 years, 2026/2027 prices.

Summary of Costs and Benefits	**Low**	**Central**	**High**
Total set up costs	0.05	0.25	1.74
Private sector set up costs	0.05	0.24	1.71
Public sector set up costs	0.02	0.02	0.04
Total ongoing costs	1.14	1.41	3.06
Private sector ongoing costs	0.59	0.76	1.70
Public sector ongoing costs	0.54	0.65	1.36
Total costs	**1.19**	**1.66**	**4.81**
Private sector benefits	-	-	-
Public sector benefits	0.54	0.65	1.36
Total benefits	**0.54**	**0.65**	**1.36**
Net Present Social Value	-0.65	-1.00	-3.45
Business Net Present Value	-0.65	-1.00	-3.42
Net Cost to Business (EANDCB)	-0.06	-0.10	-0.34

Source: Home Office estimates, 2025. £ million estimates rounded to 2 decimal places (unless less than +/- £0.005 million).

Non-monetised impacts

Non-Monetised Costs

Cost 8: Other administrative costs

84. Under the 2001 Regulations, those entitled to produce or supply a Schedule 1 drug must keep records of amounts obtained, supplied and destroyed. These would constitute additional administrative costs for the businesses affected by the options considered; however, Schedule 1 is subject to fewer recording requirements compared to other Schedules due to simpler exemptions.

85. To understand how significant these costs to businesses may be, analysts consulted the relevant Home Office operational teams. Business engagement suggests it is likely businesses already have data collection and record-keeping practices in place for the chemicals which they deal with. Hence, **the additional cost to businesses of maintaining records for GBL or 1,4-BD is likely to be negligible, especially if low-cost hard-copy registers are used and/or their records already are 'compliant' with regulatory requirements**. It has not been possible to estimate how many firms will face the additional administrative costs associated with data collection and record-keeping practices, so this cost has not been monetised.

86. Given the likely inclusion of an exemption, there is also likely to be a short-term additional burden on Home Office operational colleagues needing to offer advice to businesses regarding whether or not they are covered by the exemption. This cost is expected to be relatively minor.

Cost 9: Compliance costs

87. Under a Schedule 1 controlled drugs licence, firms will need to comply with storage requirements. Many firms are industrial and possess large quantities of GBL or 1,4-BD. This means that those firms, if infrastructure is not already in place, will need to build sufficient infrastructure to keep the product secure or adapt existing premises. If GBL or 1,4-BD is not securely kept, it could be diverted to the illicit market.

88. It is not possible to estimate how many firms may require additional infrastructure, so this cost is not monetised. This may mean that the compliance costs are underestimated. Based on early industry intelligence, businesses have reacted well to improving security in their factories and have also found less costly methods to comply with storage requirements.

Non-Monetised Benefits

89. It has not been possible to monetise any of the benefits outlined in this section. This is because of the difficulty in obtaining reliable estimates of the number of victims and users. Society may accrue the benefits described below if the rescheduling results in a decrease in the illicit supply of GBL and 1,4-BD and a subsequent decrease in the quantity of these drugs being consumed and/or used to commit crimes.

90. It is likely that the rescheduling of GBL and 1,4-BD from a bespoke status to Schedule 1 will lead to a reduction in the supply of these drugs because, in practice, the current legislation allows for access to these drugs.

Benefit 2: Reduction in GBRS-related poisonings and deaths.

91. In 2024/25 there were 884 adults in treatment for GHB/GBL[42] in England. In addition, 30 deaths were registered in England and Wales in 2024 which mentioned GHB-related poisonings on the death certificate[43]. If the intervention is successful in preventing the illicit supply of GBL and 1,4-BD, this is likely to reduce the healthcare costs associated with an overdose, alongside mitigating the wider societal and economic impacts associated with deaths caused by GHB and related substances.

Benefit 3: Costs of harms avoided

92. There are several harms incurred by society from the misuse and weaponisation of GBL and 1,4-BD, including homicide and rape. In recent years there have been several cases of rapes committed using these or similar substances[44]. The economic and social cost of a homicide is £4.50 million, and the economic and social cost of rape is £55,100 (both in 2026/27 prices)[45].

93. These costs are driven by a number of factors, such as physical and emotional harm, health services and lost output. If the intervention is successful in reducing the misuse and weaponisation of GBL and 1,4-BD, and successfully reduces the incidence of such crimes, there would be a benefit in terms of socio-economic costs avoided.

Benefit 4: Police and Crime and Justice System (CJS) costs avoided

94. If the intervention is successful in preventing the illicit supply of GBL and 1,4-BD to criminals to misuse in weaponisation including DFSA, and to recreational users consuming the drugs consensually, there may be fewer individuals requiring police intervention, saving police costs and time. It may also reduce the number of criminals entering the CJS to be prosecuted and subsequently imprisoned. These reductions in costs would be a benefit to the UK taxpayer. If illicit supply did continue it would be easier for police and the CJS to charge and prosecute offenders, although this would also incur additional costs.

Expected overall impacts

95. The expected impact of the policy proposal on social welfare is positive where non-monetised benefits are expected to outweigh the monetised and non-monetised costs. The impact will be positive for households where the licensing of GBL or 1,4-BD may bring several benefits including a reduction in deaths and other serious harms. These are expected to be outweighed by the costs which will fall on businesses in the form of administrative and familiarisation costs and ongoing licence and DBS check costs.

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42 Office for Health Improvement and Disparities. Substance misuse treatment for adults: statistics 2024 to 2025, https://www.gov.uk/government/statistics/substance-misuse-treatment-for-adults-statistics-2024-to-2025

43 ONS. Deaths related to drug poisoning by selected substances, England and Wales: 2024 registrations edition, https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/datasets/deathsrelatedtodrugpoisoningbyselectedsubstances

44 BBC News Article: GHB: The drug used as a 'rapist's weapon of choice', https://www.bbc.co.uk/news/uk-51006504?link_location=live-reporting-story

45 Home Office. The economic and social costs of crime - Table 1, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/732110/the-economic-and-social-costs-of-crime-horr99.pdf

Distributional Impacts

Groups affected

96. The main groups affected by Options 1 and 2 are expected to be the businesses who will require a licence from the Home Office to possess, import, export, produce or supply GBL or 1,4-BD; victims of DFSA; and those who consume GBL and 1,4-BD voluntarily. Voluntary consumption of GBL and 1,4-BD is thought to be particularly prevalent amongst men who have sex with men (MSM)[46].

97. Businesses that import, export, produce, supply, or possess high purity GBL or 1,4-BD will need to apply for and be granted licences, including payment of the appropriate fees, and will also be required to maintain standards such as record keeping and secure facilities. These represent costs to the industry.

98. MSM who may use GBL or 1,4-BD for chemsex[47] are likely to be disproportionately affected by this policy change, which is expected to reduce access to these substances. MSM may initially consent to the taking of GBL or 1,4-BD but may subsequently become unable to give or rescind sexual consent due to their intoxicated state, putting them at risk of harm. Any potential benefits from reducing the prevalence and harms from GBL or 1,4-BD misuse may disproportionately benefit MSM.

Small and Micro Business Assessment (SaMBA) impacts

99. The impacts of Options 1 and 2 on micro and SMBs are uncertain; the consultation survey aims to find out how many micro and SMBs currently trade/possess/supply GBL or 1,4-BD. The consultation will aid the decision on the most effective exemption to be used for products containing GBL or 1,4-BD.

100. It is important that micro and SMBs are accounted for as they are often most impacted by regulatory change and the requirement of a controlled drugs licence. In early communication with several businesses, they have outlined that the regulatory change without an exemption would force their operations to close. This would threaten domestic jobs and lead to a more concentrated market with fewer firms having greater dominance in the market. This could result in customers becoming worse off due to reduced options/choice or from higher prices.

101. There is a risk that the costs associated with licensing fees will be impactful enough that some firms may exit the UK market for products containing GBL and 1,4-BD, although it is more likely that they would alter their processes (for example, to import lower concentration mixtures). It is unlikely that large chemical firms would find the licensing cost high enough to exit the UK market. Affected firms who use products not subject to the exemption on a small scale or with marginal returns may not find the licensing costs worth it and discontinue that aspect of their operations.

102. SaMBA impacts and associated risks are greater in **Option 1** than **Option 2**. This is because in **Option 1**, more businesses would require a licence.

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[46] ACMD, 2020, paragraph 10.19. Available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936953/Final_GHB RS_report_20_November_2020.pdf

[47] Definition: Chemsex is "the use of drugs before or during planned sexual events to facilitate, enhance, prolong and sustain the experience" (Maxwell S, Shahmanesh M, Gafos M. Chemsex behaviours among men who have sex with men: A systematic review of the literature. Int J Drug Policy. 2019 Jan; 63:74-89)

Impacts on wider government priorities

International Considerations

103. This policy is unlikely to have a significant negative impact on imports or exports. No UK businesses export controlled drugs, but there may be a small impact on imports due to the additional licensing costs to import or export controlled drugs. The consultation aims to address these gaps and the necessary modifications to this appraisal will be made in the final-stage IA to reflect the consultation's findings.

Policy Risks

104. **Business Environment - Loss of business and jobs:** If businesses cannot replace non-exempt products containing GBL or 1,4-BD some businesses may be forced to make cuts elsewhere. This may be in the form of employment cuts or a reduction of products. The legislative change could impose costs on multiple industries including chemicals, inks, printing, flavouring, pesticides and more.

105. **Business Environment - Market power risk**: If too many firms choose to exit the market due to high licensing costs, there may be a higher concentration of market power among the remaining firms. The result of this lack of competition may be an increase in the market price of products containing GBL or 1,4-BD, such as household cleaning products, for consumers which may decrease the quantity of products containing GBL or 1,4-BD that consumers will purchase as well as reduce consumer choice. This risk is greater in **Option 1** than **Option 2**. This is because in **Option 1**, more businesses would require a licence.

106. **Business Environment – Risk the illegal market for GBL and 1,4-BD continues:** The benefits of tightening the control of GBL and 1,4-BD are based on harm reduction associated with a reduction in drug misuse and criminal activity. The intervention is intended to deter the criminal consumers and allow only legal consumers to participate in the market. It is still possible for GBL and 1,4-BD to be illegally trafficked into the UK. The licensing regime may well increase the price that criminals and drug users must pay to buy GBL and 1,4-BD; but it is likely that it would still be possible for criminals and drug users to obtain GBL and 1,4-BD through an illicit market.

107. If the exemption does not sufficiently prevent all routes for illegitimate access to GBL or 1,4 BD, then rescheduling would fail to reduce criminality associated with the substances. For example, if the price is sufficiently inelastic, then criminals may be able to continue purchasing exempt mixtures, from which to extract GBL and 1,4-BD by chemical processes.

108. The risk may be higher with **Option 2** than **Option 1**. This is because the concentration threshold for exemption is higher meaning extraction might be easier, or the product could be consumed directly which is especially likely where mixtures below 99 per cent concentration are exempt under Option 2.

109. **Criminal Environment – Demand for GBL and 1,4-BD is unresponsive to price, increasing price and revenue for criminals supplying**: If GBL and 1,4-BD becomes very difficult to obtain due to this intervention, the price on illegal markets may increase. If the price elasticity of demand for GBL and 1,4-BD is relatively inelastic, then the quantity of the drugs demanded by criminals and drug users will decrease only slightly, if at all. In this case, the increase in price would lead to higher revenues for suppliers, and the associated harms caused by caused by the misuse of GBL and 1,4-BD would

likely persist. However, if demand is elastic, a price increase would decrease the quantity demanded of GBL and 1,4-BD, reducing the harms imposed on society.

110. In the instance that the price on illegal markets increases but demand is relatively inelastic, there will be an increase in the revenue generated for criminals supplying the drugs. This increase in the available revenue in the market may, as some literature from America suggests[48], result in an increase in serious violence. This violence would impose further harms on society without reducing the harms from GBL and 1,4-BD misuse.

111. **Criminal Environment - Substitutability of demand for GBL and 1,4-BD:** The benefits of this intervention are based on harm reduction. However, if this intervention is successful in diverting criminals from accessing GBL and 1,4-BD they may substitute these with another drug. If the harms associated with this drug are equal or greater to those of GBL and 1,4-BD use, then the intervention will have had no overall benefit whilst imposing costs on UK businesses. This risk is mitigated because likely substitutes are highly likely to also be controlled under the Misuse of Drugs Act 1971 and in any case would be subject to the Psychoactive Substances Act 2016.

[48] Evelina Gavrilova, Takuma Kamada, Floris Zoutman, Is Legal Pot Crippling Mexican Drug Trafficking Organisations? The Effect of Medical Marijuana Laws on US Crime, The Economic Journal, Volume 129, Issue 617, January 2019, Pages 375–407, https://doi.org/10.1111/ecoj.12521

B. Statutory Equalities Duty

Mandatory specific impact test - Statutory Equalities Duties	Complete
There is limited data available to test the impact of Options 1 and 2 on all protected characteristics. Available evidence does not indicate that the proposals are likely to give rise to a disproportionate impact by reference to age. Reported population prevalence of GHB was relatively low in England and Wales in 2024/25; 0.03 per cent of 16 to 59 year olds reporting GHB use in the previous year in the CSEW, the same as the previous year[49]. Reported population prevalence for GHB, GBL and closely related compounds was also relatively low in 2011/2012; 0.13 per cent of 16 to 59 year olds reporting use in the previous year in the CSEW [Home Office, 2012], an increase from 0.04 per cent the previous year.[50] More recent prevalence data is not available yet but other data would indicate the prevalence is likely to be still relatively low. According to Public Health England data on the number of new treatment presentations citing GHBRS as a problem drug, in 2018 to 2019 there were 314 cases; in most recent year 2021/2022, there were 348 new presentations for treatment for GHB and related substances. The number of offenders convicted of offences under the Misuse of Drugs Act 1971 related to GHBRS is very low at approximately ten offenders per year[51]. GHBRS has wide-reaching social harms. In recent years, GHBRS have been used to facilitate serious crimes including murder, rape, sexual assault and robbery. In 2016, Stephen Port was found guilty of four counts of murder, four counts of rape, and other crimes - facilitated by GHBRS[52]. Gerald Matovu was also convicted of drugging men with GHBRS and stealing from them after meeting for sex. He had induced an overdose in one of his victims[53]. Reynhard Sinaga was convicted of 136 counts of rape of men in a series of trials between July 2018 and December 2019[54]. Expert evidence suggested he used GHBRS to incapacitate his victims before raping them. Zhenhao Zou was convicted of raping 10 women after incapacitating them with GHBRS in 2025[55]. While these high-profile crimes are evidence of the impact of GHBRS, when it is used without consent, there is a severe lack of data on the use of GHBRS in DFSA. One of the reasons for this lack of data is that it is suggested that only 14.7 per cent of sexual assault by rape or penetration victims (including DFSA by rape or penetration) in England and Wales report it to the police [56]. The ACMD concluded that DFSA is under-reported "because sexual assault in general is:	Yes

[49] ONS, 2025. Drug misuse in England and Wales – Appendix table. Available here: https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/drugmisuseinenglandandwalesappendixtable
[50] Unless otherwise stated, the evidence is set out in the ACMD's report – "An assessment of the harms of gamma-hydroxybutyric acid (GHB), gamma-butyrolactone (GBL), and closely related Compounds". Available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936953/Final_GHBRS_report_20_November_2020.pdf
[51] Criminal Justice Statistics quarterly, December 2020. Available here: https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-december-2020
[52] Reported here: https://www.bbc.co.uk/news/uk-england-london-58800989
[53] Reported here: https://www.bbc.co.uk/news/uk-england-london-49661915
[54] Reported here: https://www.bbc.co.uk/news/uk-50987823
[55] Reported here: https://www.bbc.co.uk/news/articles/cwyjxv1j9g8o
[56] To note: this is only related to rape or assault by penetration (including attempts) experienced since the age of 16 years. The reporting rate of rape and assault by penetration may be higher than all sexual assault offences.
Source: ONS, 2025. Nature of sexual assault by rape or penetration, England and Wales. Available here: https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/natureofsexualassaultbyrapeorpenetrationenglandandwales

• under-reported; • forensic testing is needed to identify any drugs, which is challenging retrospectively; and • because victims often do not report the assault, and if it is reported it is not often reported immediately." The planned policy changes have been identified as having particular relevance for a group sharing a protected characteristic, namely MSM, given the documented patterns of criminal misuse of GHBRS. However, the government does not consider that the measures are likely to give rise to a disproportionate negative impact. The measures pursue a legitimate aim and are considered a proportionate means of achieving that aim, namely reducing the ability of criminals to acquire and weaponise GHBRS, for the benefit of all potential victims, including MSM. In line with the ACMD's recommendation, the government has considered these recommendations together to mitigate any unintended consequences. **The SRO has agreed these summary findings.**	

Clarity of legislation Introducing new legislation provides an opportunity to improve the clarity of existing legislation. Legislation with multiple amendments should be consolidated, and redundant legislation removed, where it is proportionate to do so.	Yes