

To whom this may concern,

I am writing in to you and the TGA in consultation regarding your proposal to reschedule alkyl nitrites (amyl/poppers) to a schedule 9 substance. I urge you to reconsider your position and continue to allow those who use amyl to continue to do so without becoming criminals overnight for using a very low risk substance they have been using for years. There are several reasons why I believe you should not start a prohibition on amyl which could be very damaging to some Australians, particularly those already vulnerable in society. Firstly, you should not criminalize the possession of amyl because of its significance to gay and bisexual men. Amyl facilitates receptive anal sex and can significantly reduce any pain. This is especially helpful for your young men just beginning to explore their sexuality and having anal sex for the first time, when they are inexperienced and in need of some comfort. Amyl really helped me when I was first learning to have safe and enjoyable receptive anal sex, otherwise the pain would have been very bad as I was inexperienced, and of course, gay/bi men do not receive adequate sex education to otherwise help prepare them. Statistics from a recent survey show that a very large proportion of gay and bi men, 40%, had used amyl in the last 6 months. To reschedule it to schedule 9 would make a massive proportion of the LGBTI community who are upstanding and law abiding citizens criminals overnight. Considering for most of Australia's history gay and bi men have had their relationships, sex, and mere existence criminalized and stigmatized, to change the laws now and make tens of thousands of us criminals once again just for living our lives and trying to enjoy sex together is I believe a truly horrid proposal. We still do not have full equality in the law, and now the laws could be used to stigmatize us greatly even more. The usage of amyl by these men to enable safe and enjoyable sex is not misuse at all, as the TGA previously and ignorantly claimed. Its usage so reduces the risk of tears, fissures and condom breakage for these men, thereby reducing the risk of STI's such as HIV; clearly beneficial.

Secondly, you should not criminalize amyl position because it has a very low risk of harm. They do have a legitimate therapeutic benefit (no matter what some say) as they help enable safe and enjoyable anal sex. They also have zero risk of dependency unlike the rest of substances in schedule 9. They are non-addictive, non-psychoactive and infrequently used. To classify such a substance in the same schedule as heroin is clearly overkill. And despite being so commonly used, there is very few reports of harm done by any. Banning it could also negatively affect gay and bi men's mental health who feel their sex is still being stigmatized and targeted by laws.

Furthermore, other drugs that enable safe and enjoyable sex are not prohibited for human use, such as Viagra. It seems completely hypocritical and discriminatory that a drug that facilitates enjoyable sex primarily used by heterosexual men is legal, regulated and accessible, while amyl primarily used by gay and bi men to help facilitate their sex is illegal. The difference is glaringly obvious, frustrating and borderline homophobic. A much better decision would be to regulate and package amyl similar to Viagra, along with better labelling and community education to reduce the risk of harm.

Moreover, the reported risk of eye damage has only been associated with one specific type of alkyl nitrite, isopropyl nitrite, which is not commonly used or available. Ban that if you will, but the more commonly used isobutyl nitrite, has been shown to be safe for human use and should be kept legal. In the EU, when isobutyl nitrite was banned, many users switched to using isopropyl nitrite, which caused more harm as a result. The same would likely happen in Australia. Any risks associated with isobutyl nitrite are straight forward to manage and could easily be minimized with regulation, so keeping it legal would be a much wiser decision and would be safer for those who use it.

For these reasons, I believe amyl should not be rescheduled to level 9 and I urge you to do the right thing and reconsider your decision.

Thank you for your time.