

13 January 2019

To whom it may concern,

I am writing regarding the public consultation for regulatory options for appropriate access and safety controls for alkyl nitrites which is currently open for submission.

I strongly oppose any suggested change to move all alkyl nitrites to a Schedule 9 substance.

As a university educated gay male I have found the use of alkyl nitrites, commonly known as "Poppers" to be of therapeutic use in enabling sexual intimacy and fulfilment. Receptive anal sex for me would not be possible without the therapeutic benefit they provide. I have safely been using alkyl nitrites for many decades with the support of health care professionals such as my general practitioner.

Poppers are used by unscrewing the bottle, holding the bottle to one nostril, and inhaling the 'headspace' (the gas between the liquid and the bottle-cap). I am able to control the use by single dose and varying how I inhale (deeply or shallow) and how often I re-dose. The effect of Poppers works by relaxing smooth muscle in my body, which includes the inner anal sphincter, a ring of muscle therefore allowing receptive anal sex.

Without the use of Poppers earlier in life I experienced difficulties with initial anal penetration and tearing of the anal area making the entire sexual encounter awkward, uncomfortable and a health risk. To my knowledge (and that of my health care professionals) there are no other substances available to facilitate the same outcome for receptive anal sex besides illicit substances, something I am not prepared to use.

I have experienced minimal, if no side effects from the use of Poppers. Side effects are extremely rare for me and could be headache but most commonly loss of erection. Side effects are self-limiting by ceasing use. My medical health is not impacted by their use as demonstrated through regular contact with health care professionals.

I am openly comfortable with discussing my use with my health care professionals. Should a schedule change occur to Schedule 9 any use would not be discussed with my health care professionals. Through open discussion I am educated on potential risks of use such as interaction with drugs such as Viagra and the risks they pose when used together with alkyl nitrites. Through this education I ensure I am safe and my sexual partners are as well.

I experience no dependent use of Poppers are strictly only use them for the reason described in this submission.

Moving alkyl nitrites to a Schedule 9 substance would remove all education from the use of the substance that has a therapeutic benefit. The TGA has an opportunity to reduce risks associated with Poppers misuse and can be addressed through better labelling and packaging, together with community education by not creating a Schedule 9 for this substance.

I have experience no eye related difficulties and are aware of the risk of 'poppers maculopathy' that is relatively low and appears to be linked to one specific form of poppers (isopropyl nitrite) that is not commonly available in Australia.

In the Interim Decision the use of alkyl nitrites to facilitate sexual intercourse was listed as a form of abuse. I strongly suggest, based on this submission provided that Poppers have a legitimate use in facilitating sexual intercourse and this should not be seen as abuse.

I am strongly concerned that any ban would drive a black market of product substitution therefore increasing risk as has been seen overseas. Poppers will remain available on the black market for purchase online or through the illicit drug market — and the packaging of illicit products cannot be regulated.

As a gay male, member of the LGBTI community, I would welcome better labelling, safer packaging and more accessible information – but the proposed reschedule will actually prevent that from happening if it goes ahead. The TGA has options to create safer use without a Schedule 9 listing.

In summary I believe the TGA could enable safe use and reduce any harmful effects of alkyl nitrites by:

- Reschedule isopropyl nitrite (only) to Schedule 9; and leave other alkyl nitrites in Schedule 4 where they are now. As noted earlier isopropyl nitrite is the only substance that has any evidence to support health implications.
- Mandate better packaging, such as child-proof caps, and labelling that clearly states the product should not be swallowed. This could be done by moving Poppers to Schedule 5 ('Caution') or 6 ('Poison') instead of Schedule 9 or by collaboration with state governments.
- Work with LGBTIQ health organisations to develop appropriate health promotion materials to support safe use and minimise harms associated with overuse.
- Consider rescheduling some Poppers products in a way that would allow them to be sold in pharmacies or restricted premises (e.g. adult shops) with more appropriate packaging, labelling and with guidance/education about correct use.

Should the TGA move to make alkyl nitrites a Schedule 9 substance it will significant impact my abilities to have safe consensual sexual intercourse.

Yours Sincerely,

