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Item 1.4 Sanguinarine

Whilst I am a naturopath and herbalist I do not support or encourage the use of Black Salve or any medicines claiming to cure serious diseases like cancer. Nor do I advocate that patients self-manage conditions like this, or take medicines that are not manufactured under the appropriate conditions.

However the proposal to make Bloodroot (*S.canadensis*) a restricted substance would restrict Bloodroot from being used internally, and potentially restrict Greater Celandine (*Chelidonium majus*) a herb that has been used for hundreds of years for digestive disorders.

I am not aware of any naturopaths or herbalists that supply or make Black Salve. It appears that mostly it is ordered on-line (another practice I discourage) from international companies who are not Australian businesses. That being the case, I can't really see how making Bloodroot an S10 substance will actually stop companies that already have no regard for the law, to suddenly observe it. Therefore, we would lose access to these herbs and potentially others, for no real gain.

Why can't the suppliers of these medicines be policed? It seems like a more useful and fair approach to address the problem: being those that promote and sell a product which is potentially dangerous and which encourages dangerous behaviours.

Or/and if the main concern is topical use, can this particular use be scheduled?

In summary, I do not support the proposed amendment as it does seem like it will make a difference to the problem identified, and at the same unnecessarily limit access to medicines.

Item 2.1 Arbutin

Arbutin is a constituent of *Arctostaphylos uva-ursi* (Bearberry) a herbal medicine which has an established history of use throughout the world for lower urinary tract irritations and infections such as cystitis.

I have used it to treat patients with cystitis without any adverse effects. If symptoms continue, or the infection is protracted (more than 10 days) I recommend patients see their GP to reduce the risk of renal complications.

My reading on the substance suggests that the hydroquinone arising from arbutin is rendered inert through immediate metabolic pathways. So the risk to humans seems rather minimal.

I do not think the content restriction is necessary, but could accept it.

I support the application to dissociate arbutin from hydroquinone in the Index of the SUSMP, making herbs that contain arbutin available for use again.