



## **PROPOSED AMENDMENTS TO POISONS STANDARD**

**ACMS Meeting June 2019**

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**Comments by The Pharmacy Guild of Australia to the proposed amendments referred by the delegate for scheduling advice for consideration by the Advisory Committee on Medicines Scheduling**

1. 1.4-dimethylpentylamine (DMPA)
2. Phenpromethamine
3. Sanguinarine
4. Arbutin

Date

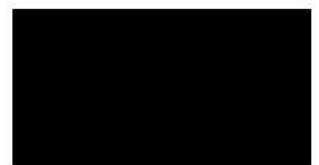
13 May 2019





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## 1. 1,4-DIMETHYLPENTYLAMINE (DMPA) 1

We note that this substance is currently under Schedule 10 due to its similarities to 1,3-dimethylamylamine (DMAA) and 1,3-dimethylbutylamine (DMBA) and that the new entry is proposed to remove any ambiguity about the scheduling of this substance.

This substance is prohibited by the World Anti-Doping Agency as a stimulant.<sup>1</sup>

We have no objection to the inclusion of 1,4-dimethylpentylamine (DMPA) in Schedule 10 of the SUSMP.

## 2. PHENPROMETHAMINE

We note that phenpromethamine is a member of the phenethylamine family which acts as a central nervous system stimulant.

This substance is prohibited by the World Anti-Doping Agency as a stimulant.<sup>2</sup>

We have no objection to the inclusion of phenpromethamine in Schedule 10 of the SUSMP.

## 3. SANGUINARINE

We note that sanguinarine is a toxic polycyclic ammonium ion which is extracted from many plants most commonly the bloodroot plant. Products including sanguinarine are claimed to treat a variety of skin conditions such as warts, moles and skin malignancies.

The TGA warned consumers about the use of Black and Red Salves in treating cancer in March 2012<sup>3</sup>. As noted by the TGA:

*“The recent use of products marketed as containing 'Black salve' in Australia has resulted in serious harm to the skin of three Australian consumers who used the black salves for various skin conditions including the treatment of a skin cancer. The TGA is not aware of any credible, scientific evidence which shows that any black or red salve preparation is effective in treating cancer. These types of salves have not been formally assessed by the TGA and are not included in the Australian Register of Therapeutic Goods or exempted from inclusion.”*

We would refer the ACMS to an article by Cliff Rosendahl of The University of Queensland, “Science or Snake Oil, what is black salve?”<sup>4</sup> that concluded:

*“In the future laboratory studies and ethical clinical trials might discover a beneficial role for blood-root products. But at present the use of black salve has no justifiable place in medical practice.”*

We have no objection to the proposal to include sanguinarine for therapeutic use (except in preparations containing 0.1 per or less) in Schedule 10 of the SUSMP.

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<sup>1</sup> <https://www.wada-ama.org/en/content/what-is-prohibited/prohibited-in-competition/stimulants>

<sup>2</sup> <https://www.wada-ama.org/en/content/what-is-prohibited/prohibited-in-competition/stimulants>

<sup>3</sup> <https://www.tga.gov.au/alert/black-and-red-salves-treating-cancer>

<sup>4</sup> <https://medicine.uq.edu.au/article/2018/05/science-or-snake-oil-what-black-salve>

## **4. ARBUTIN**

We note arbutin is currently cross referenced to hydroquinone in the SUSMP index. Arbutin is a glycosylated hydroquinone extracted from the bearberry plant. It is used as a skin lightening preparations.

We have no objection to the inclusion of arbutin as a separate entry in the SUSMP.