



10<sup>th</sup> February, 2020

The Delegate  
Therapeutic Goods Administration

**Re.: Proposed amendment to the Poisons Standard – arbutin**

I am writing on behalf of Integra Healthcare to express my support for the proposed amendments to the scheduling of arbutin (alpha-, beta-, deoxy- and other derivatives).

In particular, I support the proposal to treat arbutin compounds as being distinct from hydroquinone in the Poisons Standard, and to create new Schedule 4 and 6 entries for beta-arbutin that exempt oral herbal preparations containing 500 mg or less of beta-arbutin per recommended daily dose.

I agree with the delegate's assessment that arbutin compounds and hydroquinone are separate chemical entities with differing toxicological profiles, and that several herbal medicines containing beta-arbutin have a long history of safe, traditional use.

I also support the exemption from scheduling of beta-arbutin in cosmetic face creams containing 7 per cent or less beta-arbutin (with  $\leq 1$  ppm hydroquinone).

Further, I recommend that the cross referencing of 'arbutin' with 'hydroquinone' in the index of the Poisons Schedule be deleted (as per the Delegate's interim decision that preceded the current proposal). As the current proposal includes new index entries for the arbutin compounds and treats these as distinct from hydroquinone, any cross-referencing is redundant and likely to cause confusion.

I am a pharmacognocist with extensive experience in medicinal plants and their safety. I served on the TGA's Complementary Medicines Evaluation Committee (CMEC) 2008-2009 and the Advisory Committee on Complementary Medicines (ACCM) 2010-2015.

Yours sincerely,



Hans Wohlmuth PhD  
Head of Research & Development  
Integra Healthcare Pty Ltd  
Adjunct Associate Professor, The University of Queensland and Western Sydney University