



## **Submission**

### **Consultation: Notice of interim decisions on proposed amendments to the Poisons Standard - ACMS/ACCS/Joint ACMS-ACCS meetings, March 2020**

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#### **National Herbalists Association of Australia t/a Naturopaths and Herbalists Association of Australia**

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## BACKGROUND

### About the NHAAL

The NHAAL is the peak professional association for the naturopathy and Western herbal medicine profession in Australia. Established in 1920, it is also the oldest professional association of complementary therapists in the country. The NHAAL represents around 2,000 practitioners and is a member of the World Naturopathic Federation (WNL) which represents practitioners globally.

Our members provide primary care services to people suffering both acute and chronic disease. We use a combination of therapies, including diet, exercise, stress management, supplementation and herbal medicine formulations to deliver holistic treatments. We work alongside other health professionals to support conventional treatment. We play an important role in public health, including the quality use of medicines by Australian consumers.

The primary aims of the NHAAL are to:

- Promote, protect and encourage the learning, knowledge and service delivery of naturopathic and Western herbal medicine
- Disseminate such knowledge through available media and networks
- Encourage the highest ideals of professional and ethical standards
- Promote naturopathic and Western herbal medicine as safe and effective public healthcare
- Engage with legislative tools and their representatives as they relate to the practice of naturopathic and Western herbal medicine in Australia

The vision of the NHAAL is:

- Practitioners and the practice of naturopathic medicine and Western Herbal medicine are fully integrated into the primary healthcare system in Australia
- The NHAAL is recognised as the peak body for naturopathic and Western Herbal medicine
- Naturopathic and Western Herbal medicine is accessible to all
- The integrity of the profession of naturopathic and Western Herbal medicine is maintained
- The standards and quality of education of the professions continue to be promoted
- Career opportunities and research pathways for naturopathic and Western Herbal medicine professionals are developed and maintained
- The integration of traditional knowledge and evolving science is continued

The NHAAL publishes the quarterly *Australian Journal of Herbal & Naturopathic Medicine (AJHNM)*. The AJHNM publishes material on all aspects of medical herbalism and naturopathic practice including philosophy, phytochemistry, pharmacology and clinical application of medicinal plants. The NHAAL also holds annual seminars throughout Australia, with the Herbal and Naturopathic International Conference held biennially (recently in March 2019 the *11th Herbal & Naturopathic International Conference* kicked off the NHAAL's 100th year Celebrations). Since its inception, the NHAAL and its members have been at the forefront of naturopathic and Western Herbal medicine and have been influential in areas ranging from education and practice to ethical, regulatory and industry standards.

## Interim decisions on proposed amendments referred to the Advisory Committee on Chemicals Scheduling (ACCS #27, March 2020)

### 2.2 Interim decision in relation to arbutin

The NHAHA agrees with the distinction between the alpha-, beta-, deoxy-, and other forms of arbutin in the Schedules, each requiring individual controls based on their pharmacology.

The NHAHA is in support of the proposed scheduling of beta-arbutin in herbal medicines containing 500 mg or less of beta-arbutin per daily dose, noting that beta-arbutin (hydroquinone beta-D-glucopyranoside) is the only form of arbutin known to occur in plants (1), including in *Arctostaphylos uva-ursi* (Bearberry) (2), and *Turnera diffusa* (Damiana) (3). The NHAHA is also in support of the dissociation of beta-arbutin from hydroquinone in the Poisons Standard Index, with beta-arbutin showing a specific in vivo pharmacology which is distinct from hydroquinone (2).

The NHAHA is confident the proposed scheduling changes will re-enable appropriately qualified naturopaths and Western herbalists to safely prescribe herbs containing arbutin, such as *Arctostaphylos uva-ursi* and *Turnera diffusa*, within the proposed scheduling requirements, and is therefore in support of the proposed changes to the Poisons Standard regarding arbutin and hydroquinone.

### References

1. Seo D-H, Jung J-H, Lee J-E, Jeon E-J, Kim W, Park C-S. Biotechnological production of arbutins ( $\alpha$ - and  $\beta$ -arbutins), skin-lightening agents, and their derivatives. *Appl Microbiol Biotechnol*. 2012 Sep;95(6):1417–25.
2. Garcia de Arriba S, Naser B, Nolte K-U. Risk Assessment of Free Hydroquinone Derived from *Arctostaphylos Uva-ursi* folium Herbal Preparations. *Int J Toxicol*. 2013 Nov;32(6):442–53.
3. Piacente S, Camargo EES, Zampelli A, Gracioso JS, Souza Brito AR, Pizza C, et al. Flavonoids and arbutin from *Turnera diffusa*. *Z Naturforschung C J Biosci*. 2002 Dec;57(11–12):983–5.