

Re: Proposed Amendments to the Poisons Standard (Medicines/Chemicals); Alkyl Nitrites

To Whom it May Concern,

I am writing in response to the call for further submissions relation to the TGA's interim decision to schedule: alkyl nitrates, isopropyl nitrate, propyl nitrate, cyclohexane nitrate, amyl nitrate, butyl nitrate, isoamyl nitrate, isobutyl nitrate and octyl nitrate to the Schedule Nine poison standard.

I am vehemently opposed to this decision. I believe that rescheduling these substances is not only counter-productive to the intentions of the TGA but also to the tenets of Australian democracy.

I have read extensively about the substances in question with regards their make-up, creation methods, distribution, safe use and potential side effects. It is clear to me as a result that the majority of harm caused by these substances occurs entirely as a result of (1) recently altered manufacturing processes due to international regulation, and, (2) misuse or abuse of the substance as a direct result of ignorance of the user.

These are substances that have been in widespread use as inhalants as both party and sexual aids since the 1950's. It is well worth noting that side effects of their use have routinely worsened as a result of government (local and international) regulation altering the purity of their make up. Regulating these products as dangerous without directly regulating the cause of that danger is counter-productive in the extreme; especially if health and welfare of the user is the specific concern.

Further, the dangers to the eyes and to the cardio-vascular system as advised by the TGA are the side effects of ignorance amongst a slim margin of those choosing to use them. "Poppers," while widely legally available in Australia, are still treated with an unhealthy air of stigma. This has resulted in a great deal of ignorance about the products available. People don't know how to use them correctly, what their shelf life is, where and how they are made, what they contain or what the side effects are if they are mis-used. To re-label them as schedule 9 drugs suggests that all use is mis-use. Medically, this is not the case. To even suggest otherwise is to openly defy all available evidence.

Far more effective means of controlling the negative side-effects of the mis-use of alkyl nitrates are available than the draconian rendering of their use as illegal. Further, I would strongly argue that to do so would only risk endangering people further. Removing a substance from sale as illegal historically has never stopped its use. Usually it results in a lack of available, credible information as to how the substance should be safely used and forces its manufacture underground. Unregulated popper manufacture or the use of alternative similar substances as inhalants can surely only lead to far greater medical consequences and more dangerous mis-use.

I would recommend that these items remain as Schedule 4 substances and that a campaign of information begin to assist those people who choose to use them to do so correctly and with a greater understanding of the chemical make up of the inhalants, how to safely use them and what the potential side effects are of misuse.

I would also recommend a review of who makes these inhalants and what they are made from with regulations of manufacturing standards and labelling content the key result. The current stigma of these inhalants needs to be converted into a functional campaign aimed at spreading safety information rather than penalising those who choose to use it.

I would suggest that a significant reason for this decision by the TGA appears to be to actively discriminate against the LGBTQI+ community, this community being widely accepted as the most common users of alkyl nitrates et al. If this is not the case, I would ask you to very carefully consider the actions of this body and the perceptions they are currently generating. At present, as a healthy, educated, gay man who uses poppers frequently and safely, I view the TGA as deliberately and prejudicially making moves to curtail my freedom. I perceive your evidence for making these moves to be slight and your response extreme. Australia is a Westminster democracy in which the freedoms of individual lives and individual choice is sacrosanct. To curtail these rights must be done only in instances of danger and deprivation so obvious that they immediately speak for themselves.

Of all the substances available legally in Australia which our citizens choose to inhale, "Poppers" do not, in any possible realm of understanding, rank as the most dangerous or the most deadly. Anyone, whatever their degree of expertise who chooses to otherwise inform you is speaking from prejudicial self-interest alone.

As an Australian citizen and a member of the LGBTQI+ community, I can only passionately request that you urgently reconsider the redesignation of alkyl nitrates et al as schedule 9. Doing so runs counter to the best interests of Australians, both their health and their right to choice.

Yours Sincerely,