

Dear TGA delegate,

I do not support the proposed amendments to the current Poisons Standards for alkyl nitrites because I have experienced the effects of a ban on the sale of all alkyl nitrites. In 2013, Health Canada without any warning or consultation imposed their unjustified ban.

Living in a country prohibiting alkyl nitrites has led to feelings of marginalization and persecution. The prohibition of poppers pushes one to the margins of society in the never-ending search for alternative products and new suppliers. Otherwise law abiding citizens engage in dubious behaviours such as smuggling products across borders or importing products from internet sites. Such activities may have negative impacts on the health of users; increase their exposure to fraudsters and even has possible legal ramifications.

Feelings of persecution arise because decisions of national health bodies result in criminalization of how persons have sex. Health authorities who impose a discriminatory ban cause people to hide their lifestyles. Tolerance of the LGBT community is not acceptance but merely hypocrisy. Pierre Trudeau, a former Canadian Prime Minister famously stated that the state has no business in the bedrooms of the nation. In the field of government regulations, significant exceptions are made for the psychoactive drugs used by the dominant population of such products as cannabis, alcohol, tobacco and coffee.

I would like to draw attention to the presentation, dated July 25<sup>th</sup>2018, given by Cameron Schwartz, a researcher at Simon Fraser University on the Effects of the ban of alkyl nitrites in Canada. The internet address for the complete webinar, presentation and answers to questions, is <https://www.youtube.com/watch?v=5JN7phAYZPM>. A conclusion of the presentation is that the ban of the sale of alkyl nitrites by Health Canada has not reduced the usage of these products. The percentage of people using poppers has not changed following the imposition of the ban in 2013. However a consequence of the ban is that consumers cannot obtain their usual brands of products from reliable sources. This results in increased harms due to the usage of unknown products with unknown compositions obtained from less reliable sources.

The failure of Health Canada to reduce the usage of the products despite draconian measures must be attributed to omissions of the benefits brought about by usage of alkyl nitrites, an exaggeration of their harms coupled with a failure to recognize the relatively small number of persons adversely affected.

An often overlooked benefit comes from the enhanced focus on physical and corporal sensations brought about by poppers (sense of warmth, giddiness and a pounding heart) rather than mental distraction in which peripheral thoughts (of unfinished business, child care, body self-consciousness and day-to-day domestic annoyances) block the abandonment to sensation, vital for a full sexual experience. Of course, no chemical can substitute for trust, intimacy and respect, but in otherwise positive situations, nitrites may facilitate the process of "letting go." A sensation of timelessness mixed with immersion in the immediate moment is described by many users. This results in better mindfulness and decreased anxiety during sexual activity. Another benefit is the well-known muscle relaxation effect enabling less painful penetration during anal sex and for women suffering from vaginismus. The dilation

of the blood vessels can lead to enhanced erections due to increased blood flow. Finally there is the pleasure aspect. All of these benefits brought about by a single product rather than several drugs. Also the user can determine the dosage needed for them rather than taking a fixed dosage that may or may not produce the desired effects (do the job).

Advisories issued by Health Canada provide a litany of possible harms such as potentially life threatening low blood pressure, *difficulty breathing, muscle weakness, loss of consciousness (fainting or passing out), respiratory depression, and damage to the liver or kidney*. It is difficult to reconcile such harms with the conclusion of the reputable Merck Manual of Diagnosis and Therapy which states that there is little evidence of significant hazard associated with inhalation of alkyl nitrites. Although the ACMD report, dated March 16, 2016, identifies some potential harm associated with poppers, the most common after-effect is head-ache. The report's conclusion on harms is that "*Poppers .... is not seen capable of having harmful effects sufficient to constitute a social problem.*" This conclusion was first reached in a 2011 report by the council and re-iterated in the 2016 report. In 2009, the Conseil d'Etat in France lifted a ban on the commercialization of poppers because it was excessive and disproportionate to any possible harm to the users of the products.

The harms associated with poppers usage are legendary and frightening. Health authorities evoke the spectre of possible death. Cameron Schwartz reports that there were 250 million recreational doses consumed in the US and there have been no known deaths from inhalation. Similar data were reported by Thomas P. Lowry, M.D., in the Journal of Psychoactive Drugs; Jan-Jun, 1982; Vol. 14(2): 77-79. Few over-the-counter medications have as good safety data. A frightening increase in the percentage of calls to the emergency centres yet the actual number is still low. Large percent increases are easily obtained when using a small population size.

The reports of poppers maculopathy are disquieting. The medical literature has conflicting reports concerning the duration of any link between the inhalation of alkyl nitrites and vision. More is unknown than known about poppers and vision disturbance. What is certain is that only a small number of individuals have been affected. The most significant uncertainty is the lack of a mechanism linking vision impairment to the inhalation of poppers. Other medical reports implicate certain poppers based on isopropyl nitrites but not the traditional poppers. It is possible that some impurity is the culprit and not the alkyl nitrite. Then there are the questions of pre-existing eye disorders and dosage. Anecdotal stories or empirical findings are not a replacement for scientific evidence. This is only too reminiscent of the stories claiming that poppers caused suppression of the immune system and AIDS. Good science showed these claims to be untrue. Acting without knowing the whole story is fool-hardy and hurts the credibility of health authorities.

To conclude I would like to thank you on holding public consultations and seeking input from the stakeholders. Such a consultation was not undertaken by Health Canada before their arbitrary imposition of a ban on the sale of alkyl nitrites. According to the Supreme Court of Canada a meaningful consultation occurs when measures are undertaken to mitigate the concerns of the stakeholders. Just listening is not good enough. Please do not put restrictions on how Australians choose to live their lives.