

14 January 2019

Attention: TGA

To whom it may concern,

RE: Regulatory options for appropriate access and safety control for alkyl nitrates

I am a gay male in my 40s, living in Melbourne. I am writing to express my concern regarding the proposed ban on alkyl nitrates (known also as “poppers” or “amyl”).

In my experience, poppers are widely used by men who have sex with other men, including myself, to enable safer and more enjoyable sex. I am a man who has had an incomplete sex life because of considerable pain. The use of amyl has enabled me to experience some enjoyment of sex. Without it, sex simply isn't an option for me. Clearly, an inability for a man such as me to have sex would be deleterious to my mental health and my relationships.

In my time using amyl, I have never experienced any adverse side-effects other than the occasional headache. Risks are easily managed by handling and consuming amyl with care.

It is my understanding that, when banning a substance, the TGA consider that the substance have “no currently established therapeutic value and is likely to present a high risk of dependency, abuse, misuse or illicit use.”

In my opinion, **the use of amyl has therapeutic value** both physically as it enables me to have a more complete sex life. It also has therapeutic value as it enables me to have more complete relationships. It is no secret that members of the LGBTIQ community suffer alarmingly high risks of mental health issues and suicide. There is a long history of marginalisation of my community, driven by outdated societal judgments regarding same-gender sexual conduct. With no other reasonable option, banning amyl will most likely lead to either increased stigma and marginalisation of my community or will result in the consumption of dangerous and criminal substances to enable men who have sex with other men to have a complete sex life. **Amyl is the safest option to achieve the required therapeutic value I seek.**

In my experience, and in line with all the research I have read, amyl is not addictive and therefore **amyl is not likely to present a high risk of dependency**. I do not use amyl daily and I do not crave amyl. Amyl helps me in certain circumstances and my use of amyl depends on these circumstances existing, much the same as my use of paracetamol is dependent on me having a headache. The nature of amyl is that it causes physical changes and not chemical changes (such as those caused by drugs such as amphetamines or nicotine). Hence, it is fair to

say that the risk of dependency of currently legal drugs such as nicotine and alcohol are far greater than that for amyl.

Amyl is almost impossible to accidentally **misuse or abuse**. The use of amyl is extremely common yet reports of harm are, at most, rare. The ratio of harm to use for poppers is negligible. Adverse events are extremely unlikely and, to the best of my knowledge, relate to only one type of amyl product - isopropyl nitrate. There are other types of amyl, such as isobutyl nitrate, which do not seem to cause any harm whatsoever. The manner in which amyl is consumed means that it is unlikely to be accidentally over-consumed. Good packaging and health advice (e.g. child-proof lids, do not drink this product) would manage any potential harms in the same way that such harms are managed for everyday household products.

Furthermore, **the use of amyl** as a facilitating product for more fulfilling sex **does not constitute misuse**. There is **no alternative product** which is as effective or as safe. Conversely, several products exist which facilitate male-female sexual activity and these are considered safe and legal, given the correct advice for usage. I need a product which enables me to experience a full sex life and amyl is the safest product which fulfils that purpose.

I understand that the use of all amyl-style products is not entirely risk-free. However, banning amyl would be deleterious to my sex life, to my relationships and potentially to my mental and physical health. Please consider working with my community and government organisations to develop educational systems and improve labelling so that people like me can continue the safe use of amyl products.

Thank you for considering my submission.