

The Secretary
Scheduling Secretariat
GPO Box 9848
CANBERRA ACT 2601

Re: Notice inviting public submissions under Regulation 42ZCZK of the Therapeutic Goods Regulations 1990

Thank you for the opportunity to provide comment on the proposed amendments to the Poisons Standard under Regulation 42ZCZK of the Therapeutic Goods Regulations 1990, to be discussed at the Advisory Committee on Chemicals Scheduling and Advisory Committee on Medicines Scheduling ACCS meetings being held in October 2011. ADCA is the national peak body representing the interests of the Australian non-government sector for alcohol and other drugs. It works collaboratively with the government, non-government, business and community sectors to promote evidence-based, socially just approaches aimed at preventing or reducing the health, economic and social harm caused by alcohol and other drugs to individuals, families, communities and the nation.

In a global environment where increasingly there are calls to change the approach of governments from a criminal justice and law enforcement focus to more humane and effective ways to reduce the harm caused by drugs, some Australian governments have been quick to ban synthetic cannabinoids in response to presentations at hospital emergency departments. After consuming these synthetic cannabinoids such as 'Kronic', there have been reported cases of people suffering from symptoms such as heart palpitations, hallucinations and paranoia. These experiences are indeed worrying and suggest that care needs to be taken in their use and that comprehensive research into the effects on short term and long term health is required. Little is known about these at this stage, especially in relation to possible side effects, adverse reactions, potential for dependence, and other effects on humans.

There are of course a number of risks associated with the use of such substances, which impact on the possible health effects mentioned above. These include potency of the product used, half life of the psychoactive substance (a long half life has the potential to induce a prolonged psychoactive effect), their interaction with other substances, and variability in the product smoked with respect to the type of substance present and the concentration of the synthetic cannabinoid. The risk of overdose increases as the concentration of the active ingredient increases but unfortunately the packaging does not indicate the strength of the synthetic

cannabinoid. Generally, products sold have had little information on any of the ingredients and therefore users have been unable to identify potential risks.

Many would argue that the most effective way of limiting any potential harm caused by the use of synthetic cannabis is to regulate its use. The blunt instrument of banning a product only serves to encourage producers to find other chemicals that will produce a similar effect, and encourage a black market that leaves the use of these types of products uncontrolled. As a result, a situation is created where you achieve the opposite of what had been intended, with the risk of harm *increasing* rather than decreasing. The regulation of synthetic cannabinoids would allow activities such as standardisation of the product, licensing requirements, age restrictions, restrictions over advertising and appropriate labeling to identify the concentration of the active ingredient/s and other substances in the product. These strategies would help to reduce the risk to consumers.

Synthetic cannabinoids may in fact have potential benefits which if regulated could, for example, make life more comfortable for those experiencing significant health problems such as those associated with cancer and severe pain. ADCA is aware that some research work is being undertaken to understand the potential benefits of these products and therefore recommends that any scheduling of synthetic cannabinoids allows for their use in such research.

Thank you again for the opportunity to provide comment. Please contact Meredythe Crane at meredythe.crane@adca.org.au or 02 6215 9808 for clarification of any details in this report.

Yours sincerely



David Templeman
Chief Executive Officer
Alcohol and other Drugs Council of Australia

7 September 2011