Amendment of the Opium Act due to new psychoactive substances

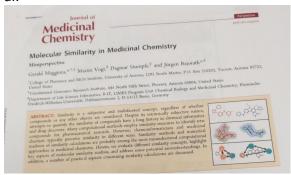
My response to consultation

When trying to weigh the harms against the benefits of NPS, I try to look in a balanced way at both those people that encounter problems (of a medical or social nature) due to using NPS and also those which just buy repeatedly without mishap or drama.

When the regular repeat consumers are brought into account, it may be that the benefit of these compounds outweighs the harm. By this reasoning, the suggested legislation is more harmful than good.

As for the "umbrella" aspect of the proposed legislation, I wish to point out that:

- 1. "The SAR paradox refers to the fact that it is not the case that all similar molecules have similar activities."
- 2. Some analogues may be important to medicine, for example, Naltrexone is an analogue of morphine that is used to treat overdose (the drug analogue that saves lives).
- 3. The Similarity Property Principle (SPP) has been documented to be unrealistic [1]
- [1] Molecular Similarity in Medicinal Chemistry. Journal of Medicinal Chemistry. G. Maggiora et. al.



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