



STARGATE INTERNATIONAL

furthering the policy and practice of drug harm reduction

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DEA ERROR ON BZP POTENCY

The American DEA report overestimates the potential harm associated with human consumption of Benzylpiperazine, (BZP) by up to 40,000%

The DEA report ¹ has an error that has not been picked up, ² and the result is that the potency of BZP is exaggerated by a factor of between 100 and 400.

The DEA report states that "BZP is about 20 times more potent than amphetamine" and then that "BZP was found to be about 10 times more potent than amphetamine in this study." The DEA report cites 2 comparative studies on BZP and dexamphetamine published in the European Journal of Clinical Pharmacology from 1973. ^{3,4}

The comparative studies published in the European Journal, however, conclude that BZP is about one tenth the potency of dexamphetamine. One article, in fact suggests that it may be between one tenth and one twentieth the potency of dexamphetamine.

Both studies compare BZP and dexamphetamine, and they use 100mg BZP as equivalent to 10mg dexamphetamine. This is because the dexamphetamine is about ten times the strength of BZP.

To misread a 10:1 ratio and a 20:1 ratio as being a 1:10 ratio and 1:20 ratio, gives an overestimation of potency of 100 and 400 times. If this potency has been a consideration in the scheduling of these substances, then there may be grounds for a review.

To give the layman some idea of potency, this means that BZP is about the same strength as caffeine, but has been misrepresented as being stronger than crystal Methamphetamine.

Attached are references from the source materials, which we have on file.

Best Regards,

Matt Bowden
FOUNDER



DEA ERROR ON BZP POTENCY - REFERENCES

1

DEPARTMENT OF JUSTICE

Drug Enforcement Administration

21 CFR Part 1308

[Docket No. DEA-247P]

http://www.deadiversion.usdoj.gov/fed_regs/rules/2003/fr0908.htm

“Consistent with the above-mentioned animal studies, it has been shown that BZP is about 20 times more potent than amphetamine in producing stimulant-like subjective and cardiovascular effects in humans (Bye C, et al., Eur. J. Clin. Pharmacol. 6: 163-169, 1973). Similarly, Campbell and colleagues (Eur. J. Clin. Pharmacol. 6: 170- 176, 1973), using a double-blind clinical study involving 18 subjects with a history of amphetamine dependence, reported that the nature and the time-course of behavioral, autonomic and subjective effects following BZP administration are similar to those of amphetamine. BZP was found to be about 10 times more potent than amphetamine in this study.”¹

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DEPARTMENT OF JUSTICE

Drug Enforcement Administration

21 CFR Part 1308

[Docket No. DEA-247F]

Federal Register / Vol. 69, No. 53 / Thursday, March 18, 2004 / Rules and Regulations Page **12795**

“BZP acts as a stimulant in humans and produces euphoria and cardiovascular changes including increases in heart rate and systolic blood pressure. BZP is about 20 times more potent than amphetamine in producing these effects. However, in subjects with a history of amphetamine dependence, BZP was found to be about 10 times more potent than amphetamine. The risks to the public health associated with amphetamine abuse are well known and documented. BZP is likely...”²

³ **BYE et al: from abstract.**

TITLE: A comparison of the effects of 1-benzylpiperazine and dexamphetamine on performance tests. Comparison of the effects of dexamphetamine and 1-benzylpiperazine in former addicts.

AUTHOR: Bye C.; Munro Faure A.D.; Peck A.W.; Young P.A.

PUBLICATION: EUR.J.CLIN.PHARMACOL., (1973) 6/3 (163-169).

The subjective, behavioural and autonomic effects of dexamphetamine 10 mg, 1 benzylpiperazine 100 mg and lactose dummy were compared in a group of 18 former amphetamine addicts. All subjects received the three preparations according to a balanced design under double blind conditions.³

⁴ **CAMPBELL et al: P175.**

TITLE: Comparison of the effects of dexamphetamine and 1-benzylpiperazine in former addicts

AUTHOR: Campbell, H.; Cline, W.; Evans, M.; Lloyd, J.; Peck, A. W.

PUBLICATION: Eur. J. Clin. Pharmacol. (1973), 6(3), 170-6

“At doses of 100mg of 1-benzylpiperazine and 10mg dexamphetamine the scores were slightly higher for the 1-benzylpiperazine which suggests that the effective potency of the two drugs was approximately in the ratio of 10 to 1.”⁴