STATUS DECISION OF CONTROLLED AND NON-CONTROLLED SUBSTANCE(S)

Substance: Raw Adrenal

Based on the current information available to the Office of Controlled Substances, it appears that the above substance is:

- Controlled
- Not Controlled

under the schedules of the *Controlled Drugs and Substances Act* (CDSA) for the following reason(s):

- The substances contained in the product are not similar to any of those listed in the CDSA.

Prepared by: ___________________________ Date: July 28th, 2011
Vincent Marleau

Verified by: ___________________________ Date: __________
Mark Kozlowski

Approved by: ___________________________ Date: __________
DIRECTOR, OFFICE OF CONTROLLED SUBSTANCES

This status was requested by: Jacqueline Oddi
Drug Status Report

**Drug**: Raw Adrenal

**Drug Name Status**: Raw Adrenal is the brand name.

Raw Adrenal is a dietary supplement manufactured by Natural Sources and is claimed to consist of the following ingredients:

- Vitamin A
- Vitamin C (Ascorbic Acid)
- Thiamine (thiamine HCl)
- Riboflavin (Vitamin B2)
- Niacinamide
- Vitamin B6 (Pyridoxine HCl)
- Pantothenic Acid (Calcium D-Pantothenate)
- Synergic Complex (Adrenal Tissue, Spleen Tissue, Rice Bran)

Vitamin A, vitamin C (ascorbic acid), riboflavin (vitamin B2), vitamin B6 (pyridoxine HCl) and thiamine (thiamine HCl) are all vitamins and have been reviewed previously. These substances are not structurally similar to any of those listed in the CDSA and are not considered controlled substances.

Niacinamide is a form of vitamin B3, which is naturally occurring in many foods including yeast, meat, fish, milk, eggs, green vegetables, beans, and cereal grains, and is typically found in vitamin B complex supplements\(^1\). This substance is not are not structurally similar to any of those listed in the CDSA and are not considered controlled substances.

Name: Niacinamide  
Chemical Name: 3-Pyridinecarboxamide  
Synonyms: 3-Carbamoylpyridine; 3-pyridinecarboxamide; beta-pyridinecarboxamide; m-(aminocarbonyl)pyridine; nicotinamide; vitamin B3, vitamin B  
Molecular Formula: $C_6H_6N_2O$  
CAS-RN: 98-92-0

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Pantothenic acid is a vitamin, also known as vitamin B5. It is widely found in both plants and animals including meat, vegetables, cereal grains, legumes, eggs, and milk.² This substance is not structurally similar to any of those listed in the CDSA and is not considered controlled substances. It is noteworthy that the calcium salt of the substance (calcium D-pantothenate) would also not be considered controlled under the CDSA.

Name: Pantothenic acid

Chemical Name: (R)-N-(2,4-dihydroxy-3,3-dimethyl-1-oxobutyl)-beta-alanine

Synonyms: Vitamin B5, (D,+)-N-(alpha-gamma-dihydroxy-beta,beta-dimethylbutyryl-beta-alanine)

Molecular Formula: C₉H₁₇NO₅

CAS-RN: 79-83-4

Synergic Complex is claimed to contain adrenal tissue, spleen tissue and rice bran. None of these substances are not structurally similar to those listed in the CDSA and therefore Synergic Complex is not considered to be controlled substance.

Recommendation: Raw Adrenal does not contain any substances that are similar to those included in the Schedules to the CDSA and therefore is not a controlled substance.

Date: 28th of July, 2011

²Haughey, SA et al. (2005) Determination of pantothenic acid in foods by optical biosensor immunoassay, J AOAC Int. 88:1008-1014.