

July 25, 2011

Marihuana Consultations
Controlled Substances and Tobacco Directorate
Health Canada
Mail Room, Federal Records Centre – Bldg 18
1st Floor, Goldenrod Driveway, Tunney's Pasture
Ottawa, ON K1A 0K9

To whom it may concern,

On behalf of the Canadian Pharmacists Association (CPhA), I am pleased to provide comments to Health Canada on the consultation document released June 17, 2011 entitled "Proposed Improvements to Health Canada's Marihuana Medical Access Program". CPhA is the national organization for pharmacists, committed to providing leadership for the profession and improving the health of Canadians. We appreciate this opportunity to comment on the proposed changes.

From the perspective of CPhA, there are a number of key changes to the medical marihuana regime that are of note. These include:

1. Physicians would be enabled to prescribe marihuana directly upon provision of a new medical declaration. The patient would no longer be required to submit information to Health Canada, nor would they require the support of a specialist. Health Canada would work with the medical community on the identification of reference material that supports appropriate physician-patient consultation on this issue.
2. Commercial producers licensed by Health Canada would be the only suppliers of marihuana. Individuals would purchase dried marihuana from one of these licensed producers. Physicians would be provided with a list of licensed producers, and Health Canada would maintain an up-to-date list of licensed producers on its website.
3. Personal production of marihuana will be phased out. Only commercial licensed producers will be authorized to produce and supply product.

CPhA empathizes with those Canadians who require the use of medicinal marihuana to address chronic health conditions. Our objective is to ensure that the care patients are receiving, and the product they are using is tested, based on the best available evidence, and is leading to the best health outcomes available. We also believe it is important that patients with chronic disease are enabled to obtain access to all of the care and regulatory approved pharmaceuticals necessary for their care. Patients, physicians, pharmacists and all health care providers need access to relevant information to support management of the patients with chronic diseases to ensure optimal outcomes.

CPhA maintains previously expressed concerns that there is a lack of evidence regarding the efficacy of marihuana as a medical treatment. There is little information, study, or evidence available on appropriate dosage, interaction with other drugs, or long-term health hazards. In addition, medicinal marihuana has not had to undergo the level of scrutiny and evidence gathering as required for other pharmaceuticals under the Food and Drug Act, particularly at a time when more stringent requirements under the Act are being considered. The lack of clinical evidence on the benefits of marihuana also puts physicians in the awkward role of prescribing a product for which safety and efficacy information is not available. CPhA believes that more study and evidence gathering on these subjects are absolutely required.

CPhA does support the greater scrutiny that will be placed upon commercial suppliers of dried marihuana, and encourages stringent enforcement of standards regarding quality, supply, control, and safety. CPhA supports phasing out personal or designated supply of marihuana, as personal production has raised serious concerns regarding quality of the product, and use of excess product for illicit purposes.

Although the proposals do not suggest that pharmacists would be involved in the dispensing or supply of marihuana, as front line medication experts, pharmacists may well be asked questions or information regarding medical marihuana, and will also be caring for patients who may be prescribed marihuana. As such, pharmacists must be kept aware and informed of changes to the program so that they can provide up-to-date, relevant information to patients, physicians and other health care providers. There would also be a great deal of value in having pharmacists represented on the Expert Advisory Committee that Health Canada has committed to establishing.

Once again, thank you for the opportunity to comment on the proposed changes to the Marihuana Medical Access Program. We look forward to continuing to work with Health Canada on these changes.

Yours truly,

A handwritten signature in blue ink, appearing to read "J. Poston", is written over the typed name.

Jeff Poston, PhD, MRPharmS.
Executive Director