

Inquiry into the use of Cannabis in Victoria

Ms Rosemary Richards

Organisation Name: Medicinal Cannabis Industry Australia

Your position or role: Executive Manager

SURVEY QUESTIONS

Drag the statements below to reorder them. In order of priority, please rank the themes you believe are most important for this Inquiry into the use of Cannabis in Victoria to consider::

Accessing and using cannabis, Young people and children, Public health, Public safety, Education, Criminal activity, Mental health, Social impacts

What best describes your interest in our Inquiry? (select all that apply) :

Advocacy body

Are there any additional themes we should consider?

Note have not ranked the above

Select all that apply. Do you think there should be restrictions on the use of cannabis? :

Sale of cannabis should be legal and regulated.

YOUR SUBMISSION

Submission:

Do you have any additional comments or suggestions?:

FILE ATTACHMENTS

File1: [5f4c3cb04815b-MCIA submission VIC Aug20.pdf](#)

File2:

File3:

Signature:

Rosemary Richards



MCIA

Medicinal Cannabis Industry Australia

**Medicinal Cannabis Industry Australia (MCIA)
Submission to the Legislative Council Legal and Social Issues
Committee, Parliament of Victoria
Inquiry into the use of Cannabis in Victoria**

August 2020

1.0 About Medicinal Cannabis Industry Australia (MCIA)

Medicinal Cannabis Industry Australia (MCIA) welcomes the opportunity to make this submission to this Legislative Council Legal and Social Issues Committee Inquiry into the use of Cannabis in Victoria.

MCIA is the peak industry organisation for Australia's licensed medicinal cannabis industry. This encompasses all activities of medicinal cannabis licence holders across research, cultivation and manufacturing and interaction with patients, the medical profession and communities.

MCIA's focus is on building an industry that enhances wellbeing through facilitating access to quality Australian medicinal cannabis products for Australian and global patients.

MCIA is providing stewardship for an economically sustainable and socially responsible industry that is trusted and valued by patients, the medical community and governments. The Australian industry and its products are built on sound science and underpinned by industry processes and standards that ensure patients, the medical community and governments have confidence in the sector and its products.

2.0 Introduction

The Legislative Council Legal and Social Issues Committee is conducting this inquiry into the use of Cannabis in Victoria to look at the best means to:

- prevent young people and children from accessing and using cannabis in Victoria
- protect public health and public safety in relation to the use of cannabis in Victoria
- implement health education campaigns and programs to ensure children and young people are aware of the dangers of drug use, in particular, cannabis use
- prevent criminal activity relating to the illegal cannabis trade in Victoria
- assess the health, mental health, and social impacts of cannabis use on people who use cannabis, their families and carers

The Inquiry is also interested in models from international jurisdictions and implications for Victoria.

3.0 MCIA comments on issues raised in the terms of reference

The medicinal cannabis industry was enabled by Federal legislation that was passed by Parliament on 29 February 2016. The amendments relating to licensing came into effect on 30 October 2016 and this has established a comprehensive regulatory framework to enable licensing of cultivation, production and manufacture of medicinal cannabis products. MCIA believes that fostering the development of a legal medicinal cannabis industry will assist in ensuring appropriate patient access and will help reduce access through the illicit market.

A clear objective of the legislation is to enable patient access to medicinal cannabis legitimately and with confidence that it meets the required quality framework. One factor that will assist to facilitate this is access to affordable local products for patients. This will be achieved if the licence holders can achieve scale and operate in an efficient market and appropriately supportive regulatory environment.

Medicinal cannabis has an important role to play in improving health outcomes. As of 31 December 2019, the TGA had approved SAS-B/AP applications for over 130 conditions (as described by the applicant) for medicinal cannabis use. The industry supports a holistic healthcare approach built around patients and their health professionals determining if medicinal cannabis is an appropriate medicine for their needs and current conditions.

MCIA believes that patients should have efficient and affordable access to a quality controlled, true to label, compliant product that is already demonstrating the potential to positively contribute to a broad range of conditions.

The Federal Government's framework enables access to medicinal cannabis under a fully regulated system, where licensed entities are required to meet a range of regulatory and GMP standards.

This framework ensures that Australian patients have access to quality products that meet TGA approved standards, thus providing confidence to the community that products are consistent, safe and true to label. MCIA members are committed to working within the legal medicinal cannabis framework established by Federal and State Governments.

The MCIA approach is based on developing an industry that has at its core, the following principles:

- Legal
- Quality
- Transparency
- Regulation
- Access

The MCIA Code (refer attached) provides guidance to MCIA members adherence to the above principles.

These principles will help address the issues outlined in the Committee's terms of reference through ensuring adherence to standards, enabling improved patient outcomes, helping promote harm minimisation and mitigating the need (and thus opportunity) for illegal cannabis trade in Victoria

The safety of patients and the community is a primary concern of policy makers and the medicinal cannabis industry. Education is a critical aspect in supporting this. Improving health outcomes and addressing clinical conditions usually involves health professionals working with the patient to assess the patient's needs, form a diagnosis and treatment plan for the prescription of a product of known composition and quality. Unaccredited practitioners and private persons should not be engaging in clinical treatment of unwell and vulnerable people using cannabis of unknown composition, which is a potential risk if products are sourced from the illicit market without the necessary controls and protections in place.

Cannabis produced by unlicensed operators using cannabis of unknown origin and composition can lead to adverse outcomes. These risks are mitigated and controlled under the Narcotic Drugs Act and Therapeutic Goods Act in respect of medicinal cannabis products.

The production of cannabis by private individuals is not subject to the GACP and GMP standards required for licensed production. This means there is no assurance of the quality or composition of the cannabis grown by private individuals. There is already evidence of dangerous additives being found in cannabis produced outside the licensed production system. Purchasing medicinal cannabis from a licensed producer is the only way to guarantee that the product has been checked to be free from impurities and contains only the active ingredients and concentration listed on the product's label.

There are several barriers or factors limiting patient access including patient affordability, regulatory impacts, reluctance by GPs to prescribe, the focus on medicinal cannabis as treatment of last resort and supply issues. These barriers/factors impacting patient access could be reduced or assisted through:

- Facilitating access to Australian product through streamlining and operationalising the regulatory system
- Building confidence through supporting evidence and transparency i.e. facilitation of research and clinical trials to provide patients and medical practitioners with an evidence base regarding safety, efficacy, pharmacokinetics and pharmacodynamics of the products, target conditions, dosages, drug-drug interactions, the appropriate rescheduling of cannabis, etc
- Improving affordability and specifically subsidised pricing to deliver more affordable product for patients
- Supporting and funding healthcare practitioner education (doctors, nurse practitioners, pharmacists and others)
- Clarification of issues such as driving regulations and medicinal cannabis use

We note that the resolution of the factors listed above together with the implementation of the MCIA Code will result in the availability of Federally regulated, high quality, true to label, legally produced and appropriately supplied medicinal cannabis products for Australian patients, which in turn addresses many of the issues listed in the inquiry.

4.0 Summary

MCIA is the peak industry body representing the licensed cultivation and manufacture of medicinal cannabis in Australia. We believe that the best way to protect public health and safety is to ensure that cannabis products are sourced from licensed suppliers and that there are the equivalent safeguards for the community as currently provided for in respect of medicinal cannabis products. This can be delivered through adoption of the principles – Legal, Quality, Transparency, Regulation and Access .