

From: [REDACTED]
To: [Medicines Scheduling](#)
Subject: Proposed Amendments to the Poisons Standard (Medicines) [SEC=No Protective Marking]
Date: Monday, 7 May 2018 3:08:42 PM
Attachments: [20180510_tga-consultation-submission-coversheet_CBDScheduling.docx](#)
Importance: High

Dear Scheduling Secretariat

Regarding proposed amendment to Cannabidiol and tetrahydrocannabinols by a private applicant – the suggested amendment is not supported.

The proposed amendments referred by the delegate for consideration by the ACMS outlined in the invitation to comment on 21 December 2017, closing for comment 2 February 2018, for the March 2018 meeting, provided far more clarity than this latest proposal. We maintain that slight modification of the 21 December 2017 wording released for consultation would be the preferred wording – that is:

CANNABIDIOL in preparations for therapeutic use in which:

- a. Cannabidiol comprises at least 98 per cent of the total cannabinoid content of the preparation; and
- b. Any cannabinoids present are only those naturally found in cannabis.

Point a) adequately addresses the levels of all other cannabinoids present in a cannabidiol preparation. It would assist clarity to both explicitly state that tetrahydrocannabinol may be included in the “total cannabinoid content” within the levels stipulated under the CANNABIDIOL entry and to cross reference tetrahydrocannabinol to cannabidiol in the Index of the Poisons Standard.

Attached is a coversheet for this submission.

Best regards,

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