



**MEDICINAL CANNABIS
INDUSTRY AUSTRALIA**

9 May 2018

Therapeutic Goods Administration
PO Box 100
Woden ACT 2606

By email: medicines.scheduling@health.gov.au

Re: proposed amendment to Cannabidiol and tetrahydrocannabinols

This submission is made by the Medicinal Cannabis Industry Australia (MCIA) in regard to the proposed amendment to Cannabidiol and tetrahydrocannabinols.

The MCIA does not support the suggested amendment.

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.

The MCIA proposes that slight modification of the 21 December 2017 wording released for consultation would be the preferred wording. Our proposal is:

CANNABIDIOL in preparations for therapeutic use in which:

- a. Cannabidiol (together with any corresponding acid) 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) with the proposed addition adequately addresses the levels of all other cannabinoids present in a cannabidiol preparation. It would assist clarity to explicitly state that tetrahydrocannabinol may be included in the "total cannabinoid content" within the levels stipulated under the CANNABIDIOL entry and further, by cross referencing tetrahydrocannabinol to cannabidiol in the Index of the Poisons Standard.

In relation to point b) we suggest deleting "dealing with unavoidable impurities".

If you require further information please do not hesitate to contact me at peter.crock@mcia.org.au.

Yours sincerely



Peter Crock
Chair