



Nimbin HEMP Embassy

"When injustice become law, resistance becomes duty"

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Support for an application to remove Cannabidiol [CBD] from Schedule 4, and to regulate as a complementary/herbal medicine

<https://www.tga.gov.au/consultation-invitation/consultation-proposed-amendments-poisons-standard-acms-and-joint-acmsaccs-meetings-june-2020#how>

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Cannabidiol [CBD] should be removed from Schedule 4 to be regulated as a complementary/herbal medicine because:

DISCRIMINATION

- Removal of CBD from Schedule 4 is another necessary step to clear up any lingering taboo around industrial hemp and medical cannabis.

GOVERNMENT RECOMMENDATIONS

- In March 2020, after an Australian Senate inquiry into the "Current barriers to patient access to medicinal cannabis", the committee released 20 recommendations including: *"... that the Therapeutic Goods Administration, as a matter of priority, conduct broad public consultation on the future scheduling of cannabidiol and other non-psychoactive cannabinoids."*

GIVE AUSTRALIAN INDUSTRY A CHANCE

- Removal of CBD from Schedule 4 would be beneficial for the Australian economy, by further diversifying the nascent Australian industrial hemp and medical cannabis industries.
- The legal cannabis market in Australia could be worth up to \$1.2 Billion USD by 2024, according to an April 2020 report¹ published by Prohibition Partners, a cannabis market intelligence firm. The growth of Australian hemp farming and cannabis companies domestically will strengthen their ability to compete with the Canadian giants of the global industry. ¹<https://prohibitionpartners.com/report-uploads/The-Oceania-Cannabis-Report-Second-Edition.pdf>
- CBD production has the potential to greatly surpass the combined fibre and oilseed markets, if regulators take a reasonable approach when addressing CBD. Furthermore, potential economic value of CBD may exceed that of medical and recreational marijuana combined.
- Hemp seed products are currently in the spotlight, but CBD's continued rise to prominence will help diversify opportunities in the hemp industry.

CONSUMER ACCESS

- Other parts of the world are way ahead of Australia: Consumers can buy CBD products over the counter in the UK, Canada, in 33 states in the USA, and in every European country except Slovakia. Industrial hemp is grown abundantly in Europe, Canada and China for the manufacture of CBD products.
- Therapeutic cannabis products like CBD are clearly herbal medicines, not standard pharmaceuticals.
- While the framework for the legitimate access to cannabis in Australia has to date been highly restrictive and complex, to allow nutritional supplements containing CBD to be made available from relevant retailers, e.g., health food stores or herbalists, would open access for a large number of consumers.
- Regulation of CBD as a complementary medicine ingredient will further increase customer access via a wider range of qualified healthcare practitioners including herbalists and naturopaths.
- The market is already speaking. For an ingredient that isn't officially approved for use in Australia, CBD is already gaining interest in the complementary medicine market. Retailers across the country have begun carrying CBD products in recent years, and it's available for purchase online. It seems similar to the situation with hemp seeds, which were widely sold and available in Australia for many years, before legal status was finally granted in November 2017.
- It's notable that there have been no criminal convictions, that we know of, against people in Australia using CBD.

REDUCED COSTS

- For a number of years now, parents of children suffering from epilepsy have been calling for easier access to CBD products. A wider availability of CBD products, and expected market competition, would reduce the now substantial costs significantly. The Senate inquiry committee even recognized the high cost of the currently limited, and tightly restricted, CBD products which are imported from overseas.
- The sourcing of legitimate imported cannabis products can be a complex process, the expense of which is passed onto the consumer. Accordingly, there is considerable impetus for the development of the Australian cannabis market.
- A sad anomaly: The seven CBD medicines currently available on the Australian Register of Therapeutic Goods from Australian producers, Little Green Pharma and GD Pharma, are for export only. While the tightly restricted and expensive CBD products available to Australian consumers, are imported from overseas.

HEALTH BENEFITS

- Since CBD is non-psychoactive, meaning it does not produce the 'high' that is typically associated with cannabis consumption, it is a safe and effective alternative for consumers who are concerned about the mind-altering effects of other cannabinoids such as THC, or of prescription pharmaceutical medications.
- Recent research and anecdotal evidence have shown CBD's potential benefits to help with anxiety, sleep regulation, heart health, and more. According to the U.S. National Institute on Drug Abuse², CBD may carry valuable anti-inflammatory, anti-seizure, and pain-relief properties, and may also be effective in treating substance abuse disorders. ²<https://www.drugabuse.gov/about-nida/legislative-activities/testimony-to-congress/2016/biology-potential-therapeutic-effects-cannabidiol>
- CBD has potential to be an effective treatment for cancer, Alzheimer's disease, Parkinson's disease, arthritis, inflammation, anxiety, diabetes, and other serious conditions³.

³ World Health Organization. 2017. Cannabidiol (CBD) Pre-Review Report, Agenda Item 5.2. 39th Meeting of the Expert Committee on Drug Dependence, 6-10 November 2017, World Health Organization, Geneva. Available online: http://www.who.int/medicines/access/controlled-substances/5.2_CBD.pdf.

SAFE & LOW RISK

- The Nimbin Hemp Embassy receives inquiries everyday about the benefits of CBD, and we estimate that there are thousands of Australian sourcing CBD products, yet we have never heard of any hospital admissions or health problems associated with the use of CBD.
- According to the TGA: *“CBD appears to be of very low toxicity. Doses of 1000mg/kg CBD appear to have been tolerated safely in humans.”* <https://www.tga.gov.au/publication/guidance-use-medicinal-cannabis-australia-overview>
- According to a report from the World Health Organization⁴: “In humans, CBD exhibits no effects indicative of any abuse or dependence potential . . . To date, there is no evidence of public health related problems associated with the use of pure CBD.” ⁴https://www.who.int/medicines/access/controlled-substances/5.2_CBD.pdf