

21 May 2020

Consultation: Proposed amendments to the Poisons Standard - ACMS and Joint ACMS/ACCS meetings, June 2020

2.2 Cannabidiol CAS Number 13956-29-1

ATTENTION: Advisory Committee on Medical Scheduling

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

Dear Sirs,

I am the Secretary of the AIHA, and I write on its behalf. The AIHA was established by incorporation in 2015 and is considered to be the peak national body for industrial hemp matters in Australia. 'Industrial hemp' is also considered to include medicinal cannabis and all aspects of the cannabis plant.

The AIHA ***strongly supports*** the application to remove CBD products, where they contain 98% or more of CBD and less than or equal to 0.2% THC, from the SUSMP and instead have them regulated as complementary medicines. The AIHA is a signatory to the original application that is the subject upon which submissions have been sought.

It is the AIHA's submission that a rescheduling of CBD from Schedule 4 to Schedule 3 ***does not go far enough*** in addressing all the conditions for which CBD can be an effective treatment. The numbers of people with the health conditions and health problems listed in the application run into many millions and the cost to the Australian healthcare system using conventional treatment practices is in the many billions of dollars per annum. Cost-effective alternatives such as CBD are desperately needed, and I advisedly use the word 'desperately'.

It is the AIHA's submission that people suffering from the said conditions and problems represent a significant proportion of the Australian population that need ready access to CBD. This will only be partially achieved by down scheduling CBD from 4 to 3. It is the submission of the AIHA that de-scheduling CBD is the most logical and humane way of giving affordable access to CBD. It will also benefit the Australian economy through job creation and a boost to exports due to increased affordability generally of CBD and medicinal cannabis.

The AIHA submits that the clear evidence of benefits of CBD referred to in the application, its good safety profile and low risk, mean that CBD should be regulated as a complementary medicine in the same way that other plant medicines (herbal medicines) are regulated in Australia.

The AIHA submits that regulating CBD as other herbal medicines and complementary medicines are regulated will substantially increase its access and reduce costs to the consumer.

The AIHA submits that regulating CBD as a complementary medicine will allow its prescription by other qualified healthcare practitioners such as western herbal medicine practitioners and registered Chinese herbal medicine practitioners, consistent with their scope of practice, and further increase access to patients.

The AIHA submits that granting the application would allow the same level of access to CBD products as is enjoyed in many western countries including the US and countries within Europe where hemp-derived CBD products may be purchased over the counter or online.

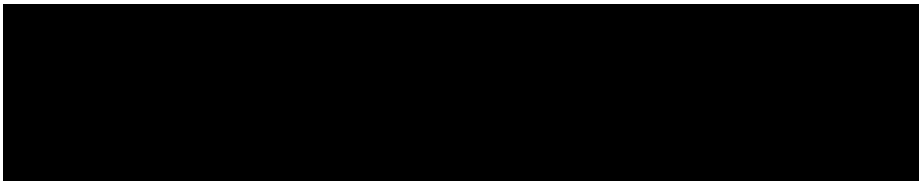
The AIHA submits that concerns about potential drug-CBD interactions can be handled effectively through limiting the amount of CBD able to be sold in a month's supply and the inclusion of appropriate warning labels.

The AIHA submits that the example of legalisation of hemp foods in Australia in November 2017 and the subsequent absence of **any** negative impacts arising therefrom should be taken into account in considering the application. It took some 17 years' of applications and lobbying and time, energy and money to achieve a good outcome in legalising hemp foods, a product made from the natural cannabis plant.

The AIHA submits that the arguments against this application are just as weak and unjustified as the arguments used by Federal and State Governments to resist the legalisation of hemp foods.

The AIHA urges that the application be granted. It is what makes sense. It is what many members of the Australian public want.

Yours faithfully,

A large black rectangular box redacting the signature of Charles B. Kovess.

CHARLES B. KOVESS LL.B. (Hons), LL.M., CSP

Secretary, Australian Industrial Hemp Alliance Inc