From: [redacted]
To: Medicines Scheduling
Subject: Proposed Amendments to the Poisons Standard (Medicines/Chemicals) [SEC=No Protective Marking]
Date: Friday, 22 May 2020 11:07:27 AM
Attachments: public-submission-cover-sheet.docx

I support the rescheduling of cannabidiol (CBD) to schedule 3 from the perspective that it is a step in the right direction on the pathway to the legalisation of cannabis.

In recent years, there has been a significant increase in the amount of interest related to products containing CBD. This has led to increases in research, availability and consumption. Currently, in Australia, CBD products are only legally available under schedule 4 via prescription from a doctor. However, they are readily available at a cheaper price point on the black market across the country and online.

Cannabidiol is a single component of a plant that has been consumed safely by humans for thousands of years. CBD was only ever prohibited because of its close relationship with cannabis. On its own, CBD is not psychoactive, has an extremely well-established safety profile, no potential for addiction and offers significant quality of life improvements for many people.

One important outcome from these regulations should be to control the quality, purity and safety of products that consumers have access to. For this to happen it is critical that Australian consumers have access to locally available products that are of high quality at an affordable price point. If the product is not affordable locally, consumers will simply be forced to purchase cheaper products from overseas. These products will have different standards with respect to quality, purity and safety depending on the market they were originally intended. Rescheduling to schedule 3 will reduce the risk profile in the minds of individual consumers looking to import CBD from overseas sellers. If Australian products are not cost comparable, importation by individuals will increase.

The process for registration of individual products on the Australian Register of Therapeutic Goods is currently unclear for CBD. Specifically, the level of evidence required for registration of CBD products will have a huge impact on the market as a whole. If, for example, randomised double-blind placebo control trials are required for each product, this will mean that only large companies will have the capital required to navigate the regulatory process. If however, literature-based submissions and observational data are to be accepted the amount of capital required to comply with regulations will be significantly reduced and thus there will be more competition locally.

The more complex and costly the regulatory process the higher the price of the final products available on the market will be. The direct cost associated with navigating a complex regulatory process will ultimately be financed by consumers and the outcome will be that fewer products make it to market and those that do will have higher prices. For this reason, it should be a priority of the committee to put in place regulations that control for quality and purity while also encouraging innovation by allowing multiple market participants, including small businesses.

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