

February 20, 2019

Strategic Policy Directorate
Cannabis Legalization and Regulation Branch
Address locator 0302B
Health Canada
Ottawa, ON K1A 0K9

Subject: Proposed approach to strict regulation of edible cannabis, extracts and topicals

Dear Sir or Madam:

On behalf of The Arthritis Society, thank you for the opportunity to provide our input on Health Canada's approach to regulating edible cannabis, extracts and topicals.

Arthritis is a disease that affects about 6 million Canadians. While there is no cure, there are a range of effective treatments that can help patients manage their pain and lead productive lives. One of those treatments is medical cannabis. Prior to legalization, more than half of Canadians authorized to possess herbal cannabis for medical purposes were diagnosed with "severe arthritis."

Overall, we have been pleased with the *Cannabis Act's* preservation of a distinct system for medical cannabis in Canada and we are happy to participate in the present consultation. We have reviewed the product labelling, packaging and quality control requirements laid out in Health Canada's proposals, and have no comment to offer on these items.

This submission provides four recommendations to help inform and support your efforts to create an appropriate regulatory framework for edibles, extracts and topicals, and outlines some of the remaining challenges that patients continue to face under the current medical cannabis system.

1. Ensure wide choice for patients with regards to potency limits for medical cannabis

Tolerance to medical cannabis and dosing requirements vary from individual to individual. The proposed THC concentration limits may make it harder for patients to dose appropriately, as some patients may require higher THC dosages for their medical conditions. We recommend that the limits imposed on recreational cannabis should not apply to medical cannabis. Potency limits for medical cannabis should rely on the best available evidence.

2. Support patient education

Education is key to helping patients develop an appropriate care plan in collaboration with their healthcare provider. Patient education can be supported by appropriate labelling, which should include elements such as potency, directions for use, and potential interactions with other elements of a patient's treatment plan. Patient education can also be supported through pharmacy distribution, which will create a clear distinction between medical cannabis and cannabis for recreational/non-medical use and help ensure that patients receive reliable on-site education on the safe and effective use of medical cannabis from trained health care professionals.



3. Invest in medical cannabis research

Although Health Canada has permitted access to medical cannabis authorized by a physician for a number of years, there remains a deficit of properly funded research and Canadian clinical trials into its use. This creates barriers to patient access as many physicians are reluctant to authorize medical cannabis in the absence of robust, peer-reviewed research. The lack of scientific and clinical research has also been cited by Health Canada as a key reason why medical cannabis is not regulated as a therapeutic product. This has also affected the ability of patients to access medical cannabis through their public, private or employer-sponsored health plans. The Canadian Institutes of Health Research (CIHR) is currently investing in cannabis research and we support more investment on the medical side to help address many of these issues.

4. Stop the taxation of medical cannabis

Affordability of medical cannabis is a major concern for many patients, as they cannot make use of existing policies and programs that can help address the costs of their medicine. Patients who access medical cannabis should be treated consistently and equitably with other patients who access health products to support their health and manage their illnesses. Prescription medicines are not subject to tax, therefore medically prescribed cannabis should also be exempt from sales and excise tax and any other levies. This does not preclude the government from continuing to apply tax on non-medical/recreational cannabis.

Closing comments

We greatly appreciate Health Canada's continued efforts to provide an effective and coherent cannabis policy framework. Thank you for the opportunity to provide our input on Health Canada's proposed approach to regulating edible cannabis, extracts and topicals. We look forward to further dialogue on these important matters.

Sincerely,

Janet Yale, CEO

About the Arthritis Society

The Arthritis Society is a national health charity that gives voice to the one in five Canadians – and one in two Canadian seniors – who have arthritis, a collection of conditions affecting joints and other tissues. Arthritis causes pain, restricts mobility and diminishes quality of life. There is no cure, so pharmaceutical treatments play a very large role in management of the condition which persists, for most people, over many years.

The Arthritis Society is Canada's largest charitable source of investment in cutting-edge arthritis research, and a leader in proactive advocacy, education and support towards delivering better health outcomes for people affected by arthritis. Safety and improved care are our top priorities, with our advocacy focused on improving access to care, timeliness of care, and innovative research. The Arthritis Society is accredited under Imagine Canada's Standards Program.

