



November 21, 2022

*Cannabis Act* Legislative Review Secretariat  
Sent by email: [legreview-examenleg@hc.sc.gc.ca](mailto:legreview-examenleg@hc.sc.gc.ca)

Thank you for the opportunity to provide input into the regulatory review of the *Cannabis Act*. Arthritis Society Canada, Canadian Arthritis Patient Alliance, Canadian Spondylitis Association and Gastrointestinal Society have collaborated to provide a joint submission focused on the questions relating to medical cannabis. Our key message is that we strongly recommend that a distinct medical cannabis access program should remain and as this review continues the patient voice should be represented and present at future meetings and consultations regarding medical cannabis.

**Q1. What are your views on the current medical access program for cannabis?**

- It is important to have a medical access program as there is growing evidence medical cannabis can help some patients manage their symptoms.
- Requiring medical authorization encourages people to seek medical advice and helps to track use.
- While there are challenges with coverage, having a medical cannabis stream recognizes its potential as a treatment and enables coverage under benefit plans.
- More research is needed to better understand the potential benefits and harms of medical cannabis.

**Q2. Is a distinct medical access program necessary to provide individuals with reasonable access to cannabis for medical purposes, or can access needs be met through the non-medical framework?**

- Yes, a distinct medical access program is necessary to ensure safety, monitoring, evaluation and commitment to innovative research.
- The medical framework provides an opportunity for the coverage of medical cannabis on patient health plans, both private and public where a recreational only framework, would require patients to pay for their medical cannabis medication out of pocket, which could lead to worse health outcomes and demand on the healthcare system.
- For those without benefit coverage, the medical framework allows medical cannabis to be deducted from taxable income as a medical expense.

**Q3. Are there specific reforms you would recommend?**

- Medical cannabis should be treated the same as other federally regulated medications in Canada. Specifically:
  - It should be prescribed by health care professionals;
  - In addition to current direct mail order for home delivery, distribution should be expanded to licensed pharmacies;
  - It should be free from taxation (both sales and excise) in all forms and potencies; and
  - It should be eligible for coverage under public and private (both personal and employee) drug benefits plans.
- Safety and improved care for Canadians living with chronic conditions are top priorities. To better our understanding of medical cannabis, investing in high-quality research on the safety and effectiveness of medical cannabis is needed.
- Also, a public education campaign about medical cannabis with information similar to [Arthritis Society Canada's resources](#) would reduce stigma for those who use medical cannabis and help to further its legitimacy as a potential treatment for pain and symptoms.
- Support for the development and dissemination of clinical guidelines for medical cannabis.
- Further develop training programs for physicians, pharmacists and nurse practitioners.
- Patients should be at the forefront of all consultations and future meetings regarding medical cannabis and maintaining the current medical access framework.

**Q4. Are there additional sources of information or data related to the medical Access program that you believe should be considered in the legislative review?**

- [Arthritis Society Canada position statement](#)
- Patient testimonial: *I use medical cannabis for sleep as needed. Sleep is important for people living with arthritis, more so for inflammatory arthritis. If we don't get a good rest our joints don't either and it makes the next day very difficult. I have spoken to my family doctor about it, and he is fully supportive as feels it is a better option than sleeping pills.*



**Arthritis Society Canada** is dedicated to extinguishing arthritis. We represent the six million Canadians living with arthritis today, and the million more who are impacted or at risk. Fueled by the trust and support of our donors and volunteers, Arthritis Society Canada is fighting the fire of arthritis with research, advocacy, innovation, information and support. We are Canada's largest charitable funder of cutting-edge arthritis research. We will not give up our efforts until everyone is free of the scorching pain of arthritis. Arthritis Society Canada is accredited under Imagine Canada's Standards Program.

**Canadian Spondylitis Association (CSA)** plays an essential role in helping Spondyloarthritis (SpA) patients achieve their full health potential and live a better life. CSA is the only patient-led, not-for-profit organization focused solely on Canadians living with SpA, a group of chronic inflammatory arthritic conditions including Ankylosing Spondylitis (AS), Axial Spondyloarthritis (axSpA), Psoriatic Arthritis (PsA), Enteropathic Arthritis, Juvenile Idiopathic Arthritis and related conditions. We provide credible and relevant resources for patients and healthcare providers. We offer support, information, advocacy and awareness to inform and empower the patient community and the thousands at risk of being diagnosed. Visit [www.spondylitis.ca](http://www.spondylitis.ca) for more information.

**Canadian Arthritis Patient Alliance** uses the power of information, research, and communication to help people living with arthritis find their voice and to support others. Many people think arthritis only affects older people, or that it is merely a word for aches and pains. At CAPA, we work to clear up these misconceptions to create a better Canada for people living with arthritis and for those who support them. Arthritis is a number of debilitating diseases which affect Canadians of all ages and backgrounds. By collecting and producing patient resources, policy papers, and outreach projects, CAPA seeks to educate and empower people living with arthritis so they can continue to positively contribute to society and improve their health care experiences. CAPA communicates its work and information in many ways: website, monthly newsletters, Facebook page, Twitter (@CAPA\_Arthritis), Youtube channel, and Instagram (capa\_arthritis).

CAPA's strategic priorities are achieved through collaboration and partnership with other patient organizations, representatives from government, policy-makers, researchers, healthcare professionals, industry, not-for-profit organizations, and other individuals and organizations. We welcome all Canadians with and affected by arthritis and those who support CAPA's goals to join our community.

**Gastrointestinal Society**, along with its partner charity the Canadian Society of Intestinal Research, are committed to improving the lives of people with gastrointestinal (GI) and liver conditions, supporting research, advocating for appropriate patient access to healthcare, and promoting GI and liver health. All our programs and services focus on providing Canadians with trusted, medically-sound information on digestive and liver health in both official languages at [badgut.org](http://badgut.org) and [mauxdeventre.org](http://mauxdeventre.org). Our BadGut@ Lectures, quarterly *Inside Tract@* newsletter, [pamphlets](#), and educational [videos](#), including [medical cannabis](#), provide Canadians with the information they require to better understand and manage their specific needs. We also work closely with healthcare professionals and governments at all levels toward system-wide improvements in care and treatment on behalf of people with GI and liver diseases and disorders. We believe that all patients deserve affordable access to appropriate healthcare and medication.