



CANADIAN VETERINARY
MEDICAL ASSOCIATION

L'ASSOCIATION CANADIENNE
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January 19, 2018

Eric Costen, Director General
Cannabis Legalization and Regulation Secretariat
Address locator 0602C
Health Canada
Ottawa, Ontario
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Dear Mr. Costen and to whom it may concern, via e-mail: cannabis@canada.ca & mail

Re: Public Consultations on the Proposed Approach to the Regulation of Cannabis

The Canadian Veterinary Medical Association (CVMA) is the national and international voice for Canada's 13,300 veterinarians. Its membership comprises Canada's authoritative expertise on veterinary science, animal health and welfare, and veterinary public health. The CVMA facilitates the development of unified viewpoints on issues for which the veterinary profession advocates and in which it believes. CVMA members include licensed veterinarians working in all of Canada's provinces and territories as private general practitioners, specialists, researchers, educators, and public servants. They provide unique expertise in regard to the health and welfare of all animals including companion animals (such as cats, dogs, and horses) food-producing animals (livestock, poultry, aquaculture), and zoo and laboratory animals, among others. In addition, the CVMA is affiliated with the Registered Veterinary Technologists and Technicians of Canada (RVTTTC) representing over 7,300 registered veterinary technicians/technologists.

Established by an Act of Parliament in 1948, the CVMA remains a leading advocate for animal welfare in Canada, through actively advocating for and promoting the humane raising and handling of animals, nurturing the human-animal bond, and developing relevant position statements and decision support tools on, for example, pain control in animals and extra-label drug use. The latter represents an important and legal strategy in the effective and efficient treatment of animals by licensed veterinarians when an approved veterinary product is not available or suitable.

The recent increase in medical cannabis used to relieve human suffering has drawn attention to the potential benefits of use in veterinary medicine. Veterinarians are now frequently fielding questions from companion animal owners, livestock producers, and others about the potential therapeutic benefits of using cannabis in animals for reasons such as the alleviation of pain, relief of anxiety, and treatment of behavioural conditions. While there is further research needed, the CVMA anticipates that cannabis, and its derivatives, could well play an increasingly important role in veterinary medicine in Canada over the next few years.

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Une profession, une seule voix.**

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The CVMA greatly appreciates the opportunity you have extended to us to be part of the consultation on the proposed approach to the regulation of cannabis. In addition to having several CVMA members attend the recent roundtables, a working group of the CVMA National Issues Committee has reviewed the consultation paper (Proposed Approach to the Regulation of Cannabis) outlining a national framework for controlling the production, distribution, sale, and possession of cannabis in Canada.

Many of the issues discussed in the consultation paper do not directly relate to the concerns of the veterinarians; therefore, the CVMA will limit its comments to those that directly impact its members.

The CVMA respectfully submits the following comments and/or suggestions:

1. Regarding the sale and access of cannabis for medical/non-medical purposes (Section 2.2.7/7.2/8)

The CVMA strongly urges that the Access to Cannabis for Medical Purposes Regulations (ACMPR) be amended to allow veterinarians to provide necessary medication to their patients, while maintaining an arms-length oversight on its dispensing. Veterinarians wish to avoid situations whereby owners purchase cannabis products for animal use without the appropriate guidance and controls, as they would most likely do if forced to purchase from non-medical sellers. The latter would be their sole option if the ACMPR is not amended to include veterinarians (and their patients).

The CVMA suggests that the ACMPR be amended to include all medical professionals experienced in prescribing controlled substances and/or botanical medicines, including veterinarians. In this regard there is a need to change the wording of the ACMPR to refer to "patients" rather than "persons" (since veterinarians' patients are not "persons"). The CVMA would appreciate the opportunity to discuss further this and other related matters with your office at your convenience.

2. Regarding Labeling (Section 6.3)

In the United States where some states have legalized cannabis, there has been a significant rise in reports of ingestion and toxicity in animals, particularly dogs. There is evidence suggesting that the species is very sensitive to tetrahydrocannabinol (THC). Given the apparent increased risk that THC-containing products have to pets, the CVMA respectfully requests that a warning statement be included on THC-containing products (e.g., "keep out of reach of pets").

3. Regarding Veterinary Health Products (Section 8.9)

Given that Health Canada has proposed new pathways for Natural Health Product submissions containing parts of the cannabis plant having only cannabinoids such as cannabidiol (CBD), the CVMA recommends that a similar pathway be created for Veterinary Health Product submissions. The CVMA understands that this would require an amendment to the VHP List C to include parts of the cannabis plant previously excluded.

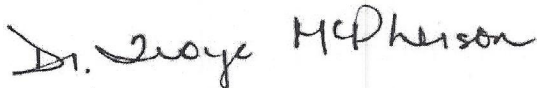
In the CVMA's experience, clients purchasing and using human natural health products, or using human products with Drug Identification Numbers for their pets, have often selected inappropriate products, used inaccurate doses, and in some cases, purchased a product with additives not intended for animal use. Such situations can result in toxicity for animals.

The CVMA believes that since CBD may have an important potential for use in animals, it is vital that veterinarians have products designed specifically for the unique needs of animal patients (including, for example, variable doses, flavourings, and formats to allow ease of administration). Please note that the CVMA has data on the use of CBD in animals that it would be pleased to share with Health Canada.

While recognizing that further research in both humans and animals is vital to build an evidence base for sound therapeutic decision-making, the CVMA supports the direction being taken by Health Canada to open up new possibilities for the use of cannabis products to alleviate pain and suffering.

In closing, the CVMA would once again like to thank you for the opportunity to provide feedback and suggestions. Please note that the CVMA staff and members are available for further discussion on these suggestions at your convenience.

Sincerely,



Dr. Troye McPherson
President
Canadian Veterinary Medical Association

SR:TMcP/ds