

Wednesday, May 20, 2020

Department of Health GPO Box 9848 Canberra ACT 2601 Australia

Re: Proposed amendments referred for scheduling advice to the Joint ACMS-ACCS #25

Dear Madam Secretary,

My name is Jason Veness and I am co-founder and Chief Regulatory Officer for Infused Products International Ltd.(IPI); a Canadian based business with active interests in the emerging cannabis sector in Australia. I am writing to you to express our support of the proposed amendments to the Poison Standard scheduling of cannabidiol(CBD).

IPI is the parent company of a vertically integrated global health-and-wellness product entity. We produce high-quality medical and wellness cannabis derived products, and nutraceuticals. We are globally connected with international distribution, and our location in the Caribbean allows us to grow year-round in warm temperatures, simple greenhouses or outdoors, and to the highest standards.

Right now, we are excited about the opportunities in Australia and we want to make sure we understand and influence the right opportunities presented by the fast-approaching global legalisation of cannabis-infused products. We are also looking for partners in the emerging cannabis sector in Australia which means that having a robust, well defined and efficient regulatory framework as well as access to compliant, competent supply chains isequally important. Global deregulation of CBD is accelerating, and we feel that supporting the proposed schedule amendments to CBD in Australia will help us participate in a cannabis

sector which provides consumers with greater access to safe quality products which can be part of the overall solutions to health and well being.

One of the biggest reasons the global CBD industry has grown so much in the past few years is because of the many associated health and wellness benefits. The medicinal uses of CBD are quickly being realized as more research and applications are discovered in jurisdictions where legal CBD has been made available. Should the proposed amendments to scheduling CBD pass, we feel that Australians will have greater access to cost effective, reliable and safe alternatives to a growing number of CBD health applications.

Cannabinoids are part of our endocannabinoid system (ECS). The ECS is a complex network within us that helps to us to regulate how our body responds to mood, sleep, appetite, and inflammation. Current research supports conclusions that CBD can help reduce chronic pain by working with the body's endocannabinoid receptors and neurotransmitters. CBD can block certain receptors and increases the number of natural cannabinoids in the body.

One suggestion we would recommend is to consider other consumption pathways. Currently oral application of CBD is the only available method of taking CBD in Australia. There are other effective ways to utilize CBD including inhaling and applying it topically. Inhaling CBD has extremely high bioavailability. Which means it absorbs quickly into the system. Inhaling brings all the benefits of CBD to you and relief of symptoms almost instantly. Expanding the scope of consumption will mean consumers will have a larger selection of products they can chose from to specifically treat wellness concerns more effectively.

By proposing to amend CBD to a Schedule 3 entry, Australia is positioning itself as a competent global participant is the cannabis sector. This industry is growing quickly as new, legal and emerging applications of CBD are being realized. We thank you for the opportunity to help lend our support to these amendments and we eagerly look forward to understanding how the Department of Health moves forward with scheduling CBD as part of a wholistic system of managing health and well being. If you have any questions please do not hesitate to contact me directly.



Jason Veness
Chief Regulatory Officer
Infused Products International