

15 May 2020

The Secretariat
Advisory Committee on Medicines Scheduling (ACMS) and Advisory Committee on
Chemicals Scheduling (ACCS)
Therapeutic Goods Administration

By email to: medicines.scheduling@health.gov.au

Dear Secretariat

Re: Proposed amendments to the nicotine and cannabidiol entries within the Poisons Standard, ACMS and Joint ACMS/ACCS meetings, June 2020.

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) welcomes the opportunity to provide input into proposed amendments to the nicotine and cannabidiol entries in the Position Standard to be discussed at the Joint ACMS and ACCS meetings in June 2020.

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) is responsible for training, educating and representing psychiatrists in Australia and New Zealand. The RANZCP has more than 6700 members, including around 5000 qualified psychiatrists. In developing this submission, the RANZCP consulted widely with members, including the Faculty of Addiction Psychiatry and the Committee for Evidence-based Practice. The RANZCP is well positioned to provide assistance and advice about issues that relate to mental health and addiction due to the breadth of academic, clinical and service delivery expertise it represents.

Proposed changes to cannabidiol entry

The RANZCP supports more research into the use of cannabinoids for medical treatment, particularly treatment for mental health conditions, as the efficacy of medicinal cannabis as a treatment for these conditions is unconfirmed. While the RANZCP's [clinical memorandum in relation to the medicinal use of cannabinoids](#) relates to medical cannabinoids more broadly, we acknowledge the proposed changes relate to cannabidiol specifically.

Though currently there may be minimal evidence to suggest negative effects of cannabidiol use (1), it is important to ensure that ongoing, long-term research is continued to ensure safety and best outcomes with the use of cannabidiol treatments, particularly in children and adolescents.

The RANZCP would like to emphasise the importance of regulating cannabidiols using the same rigor and safeguards as other pharmaceuticals and ensuring that any education in relation to accessibility is based in the most up-to-date, sound research and evidence. As such, the RANZCP supports the proposed current cannabidiol changes as consistent with policy in several other jurisdictions, and as long as the over-the-counter regulation restricts composition to <2%THC (>98%CBD) only.

Proposed changes to nicotine entry

The RANZCP holds no objections to the proposed changes to nicotine within the Poison Standard.

To discuss any of the issues raised in this letter, please contact [REDACTED], Policy and Partnerships Department via [REDACTED] or by phone on [REDACTED].

Yours sincerely

[REDACTED]

Ref: 1766

References

1. Therapeutic Goods Administration . Guidance for the use of medicinal cannabis in Australia: Patient information 2017 [Available from: <https://www.tga.gov.au/publication/guidance-use-medicinal-cannabis-australia-patient-information>].