

Advisory Committee on Medicines Scheduling
Therapeutic Goods Administration
medicines.scheduling@health.gov.au

22 May 2020

Submission to the Therapeutic Goods Association's Consultation re: Proposed amendments to the Poisons Standard (for Joint ACMS/ACCS meetings, June 2020)

Thank you for the opportunity to comment on the proposed changes.

The Science Party Australia supports the proposed amendments to schedule cannabidiol (CBD) as a pharmacist only medicine, subject to requirements, giving patients easier access to this medicine.

Under section 52E(1)(a) of the *Therapeutic Goods Act 1989*, the risks and benefits of the use of a substance must be taken into account when amending the schedules. The TGA's 'Safety of low dose cannabidiol' review¹ identifies risks and benefits of CBD use. The proposed amendments manage the risk of adverse events by restricting non-prescription access to low doses of the (-) enantiomer of CBD.

While the safety profile of low-dose (-) CBD might make Schedule 2 an option in the future, the novelty of CBD as a medicine in Australia likely justifies requiring a conversation with a pharmacist to discuss possible drug interactions.

We hope for further review as more information becomes available, for instance if CBD is demonstrated to be as safe for children as other pharmacist only medicines, then CBD might be made available to all ages as a pharmacist only medicine.

It is worth noting that the Science Party supports: decriminalisation of all drug use; reviewing the illegality of drugs on a case-by-case basis; and further research into the medicinal properties of currently illegal drugs. Regrettably, current scheduling of cannabinoids appears to be a result of the illegality of cannabis, requiring cannabinoids to be downgraded from Schedule 9 to Schedule 8 to Schedule 4 to Schedule 3. Australians deserve treatment options based on evidence of risks and benefits rather than old prejudices, and the proposed amendments further this aim.

Dr Andrea Leong
Leader - Science Party Australia

¹ 'Safety of low dose cannabidiol' Version 1.0, April 2020. Therapeutic Goods Administration.
<https://www.tga.gov.au/sites/default/files/review-safety-low-dose-cannabidiol.pdf>