

Review of the *Narcotic Drugs Act 1967*

Submission

I am a Veterinarian and Biochemist in Sydney, NSW. I am writing a submission to support and encourage a sustainable supply of safe medicinal cannabis products for therapeutic purposes in animals, and the availability of cannabis products for veterinary research purposes in Australia.

Evidence of possible therapeutic benefit in animals

There have been controlled clinical trials conducted, which have investigated the use of cannabinoids in humans and reported positive effects in respect of pain, nausea, vomiting, inflammation, cancer, asthma, glaucoma, spinal cord injury, epilepsy, hypertension, multiple sclerosis, Parkinson's disease, Alzheimer's disease, or loss of appetite.

However, quality research involving cannabis for therapeutic purposes in animals is limited.

Initial studies suggest that cannabis may promote comparable therapeutic outcomes in animal patients as those observed in human patients. For example, a researcher from Colorado State University recently reported findings from a small pilot study involving 16 epileptic dogs. She observed that 89 percent of the dogs had fewer seizures when taking chicken-flavoured CBD oil, compared to approximately 20 percent in the placebo group.¹ Another project, a randomized, placebo-controlled, double-blind crossover study conducted at Cornell University, demonstrated that dogs treated with CBD oil experienced a clinically significant reduction in pain and increase in activity.²

Nevertheless, the therapeutic use of cannabis in animal patients cannot be entirely based on the results of human studies as evidence, specifically for cannabis³ and professional experience, has shown that the different metabolic processes can result in different clinical outcomes.

Separately, evidence of the safety and tolerance profile of cannabis in dogs and cats has been encouraging.⁴

Overall, therefore, the preliminary findings in humans and animal patients warrant further investigation into the veterinary applications of medicinal cannabis in Australia.

Proposed changes to the legislation

In my view, subsection 11K(2) of the *Narcotic Drugs Act 1967* (Cth) should be changed to include, apart from the present wording of that provision, the possibility of the Office of Drug Control granting a manufacture license if it is satisfied, on reasonable grounds, that a person will be manufacturing a medicinal cannabis product for the treatment of animals. This would be the first step toward facilitating more widespread use of cannabis in research and therapy involving animal patients. Notably, however, corresponding changes to the relevant State and Territory legislation would also be required because the possession, use and supply of cannabis other than for human therapeutic use is prohibited at that level.

¹ Guiden M. Preliminary Data From CBD Clinical Trials 'Promising' (2018). Available online at: <https://cvmb.ssource.colostate.edu/preliminary-data-from-cbd-clinical-trials-promising/> (Accessed October 4, 2018).

² Wooten SJ. Cornell Takes the Lead in Cannabidiol Research (2018). Available online at: <http://veterinarynews.dvm360.com/cornell-takes-lead-cannabidiol-research> (Accessed October 4, 2018).

³ D. J. HARVEY, E. SAMARA AND R. MECHOULAM, Comparative Metabolism of Cannabidiol in Dog, Rat and Man, *Pharmacology Biochemistry & Behavior*, Vol. 40, 523-532.

⁴ See, for example: B Whalley, H Lin, L Bell, T Hill, A Patel *et. al.* Species-specific susceptibility to cannabis induced convulsions (2018) *British Journal of Pharmacology*; and A Brutlag, Toxicology of Marijuana, Synthetic Cannabinoids, and Cannabidiol in Dogs and Cats (2018) *The Veterinary clinics of North America. Small animal practice* [0-323-64270-5] 1087 - 1102.

In my view, veterinary practitioners should be able to use medicinal cannabis in special cases, in the way that medical practitioners are able to supply unapproved medicinal cannabis products through the Authorised Prescriber or Special Access Schemes. A similar framework, facilitated either under the current exemption for medicines extemporaneously prepared by veterinary surgeons, or new provisions of the Agricultural and Veterinary Chemicals Code, could enable this.

Presently, anyone wishing to investigate the effects of cannabis or cannabinoids, whether in humans or animals, must navigate a challenging legal and financial process.

Despite some confusion around the legal status of cannabis in the USA, which has made it challenging to study its effect, demand for medicinal cannabis continues to grow, with sales in 2018 having generated \$4.5 billion in revenue.

In light of all the above, it is my view that the potential for medicinal cannabis to make a positive contribution to the treatment and quality of life for many animals, in Australia and internationally, is significant. However, progress requires substantial changes to facilitate access to safe cannabis products for a variety of uses, across a variety of industries, including but not limited to therapeutic and research purposes. In particular, I hope that this review sees changes made that improve access to cannabis by veterinary surgeons and other professionals, so that formal and comprehensive research can be conducted and so that the treatment of animals can benefit from what emerging evidence suggests cannabis has to offer.