



Canadian Association of Veterinary Cannabinoid Medicine

Feb. 8, 2019

Strategic Policy Directorate
Cannabis Legalization and Regulation
Branch
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To whom it may concern, via e-mail: cannabis@canada.ca & mail

Re: Public Consultations on the Proposed Regulations for Edible Cannabis, Cannabis Extracts, and Cannabis Topicals

The Canadian Association of Veterinary Cannabinoid Medicine (CAVCM) is a national not-for-profit organization representing a growing number of veterinarians, veterinary specialists, veterinary technicians, as well as members from research, academia, and industry, that all share an interest in the developing area of veterinary cannabinoid medicine.

Like Health Canada, we firmly believe in a responsible approach to cannabis use. We strive to provide quality education to veterinary professionals and pet owners regarding both the risks and potential therapeutic benefits of cannabis and cannabinoid medicine for animals. As part of responsible use, we are also focused on advancing species-specific research to guide recommendations for cannabis product use and have been advocating for a legal pathway to access safe cannabis products for animals.

The legalization of cannabis through the implementation of the Cannabis Act in 2018 has brought with it a growing acceptance of cannabis use and more and more inquiries from pet owners about the medical use of cannabis for their pets. In order to ensure that Canadians continue to take a responsible approach to all cannabis use, including administration to animals, the CAVCM has reviewed the Proposed Regulations for Edible Cannabis, Cannabis Extracts, and Cannabis Topicals. Many of the issues discussed in the consultation paper do not directly relate to the concerns of veterinarians; therefore, the CAVCM will limit its comments to those that directly impact veterinarians and their patients.

1. Regarding the proposed THC limits for new classes of cannabis products:

While that CAVCM recognizes the consumer demand for concentrates and topical products that would require higher doses of THC per package, we also want to alert Health Canada to the increased potential for severe adverse effects should an animal ingest these products. At 1000mg per package, this would pose a *serious* risk to most animals either through direct ingestion or in the case of topical products, if licked off the skin.

While edible products no doubt pose a greater risk of ingestion by children or inexperienced adult users, animals are not always as discriminating in what they ingest and hence ALL cannabis products pose a potential risk to their health and safety.

This highlights the importance of appropriate package label warnings to keep animals safe.

2. Regarding the proposed new rules for the packaging and labeling of the new classes of cannabis products:

The CAVCM would, once again, urge Health Canada to amend the label requirements of all cannabis products, including the new classes of cannabis products, to include a warning to keep out of the reach of animals.

We know from experience that in areas where cannabis has been legalized the number of calls to animal poison control centers involving cannabis increase significantly.

Appropriate warning labels are needed for Canadian consumers in order to reduce the number of accidental pet intoxications that may occur if products are not stored safely or inadvertently administered by a well meaning, but uneducated, pet owner.

(ie. Keep out of the reach of children and animals).

We support Health Canada's proposal to require ingredients clearly listed and encourage listing the type of flavouring used, and any other ingredients, in order to make instances of animal ingestion easier to diagnose and determine if co-toxicity concerns exist. Ingredients such as raisins, chocolate, macadamia nuts, and xylitol can have a significant impact on an animal's health, required treatment, and long-term prognosis.

3. Perhaps most importantly, regarding any additional comment regarding the legalization and strict regulation of cannabis in Canada, the CAVCM would like to address *the need for amendments under Part 14 of the Cannabis Regulations*. We would urge Health Canada to amend these regulations to *include veterinarians as healthcare providers with the ability to authorize the use of medical cannabis for our patients*.

Although Health Canada proposes no changes to this area, we feel this is an area that *does* require amendments, to provide a legal pathway for veterinarians to provide cannabis therapy for their patients. We would encourage Health Canada to thoughtfully consider the following points:

Recent surveys indicate that veterinarians believe they should be allowed to authorize cannabis use for medical purposes for non-food producing animals.

- This is supported by multiple surveys of veterinary professionals noting 85-92% of those surveyed feel veterinarians should have the same ability to authorize medical cannabis use as physicians. (The remainder would like to see further research before deciding).
- The Canadian Veterinary Medical Association is also supportive of veterinarians being allowed to authorize cannabis use for treatment in animals.

The One-Health approach to medicine and medical problems are being shared with Veterinary and Human Medical School research.

- Based on the inter-species relationship, it has been shown that certain cannabinoids have similar benefits in veterinary patients as they do in human patients (references upon request).

As health practitioners, we want to be able to support our patients in a responsible manner that examines *all* treatment options.

- There are no effective analgesics for chronic pain in cats and dogs other than non-steroidal anti-inflammatory analgesics. Unfortunately, these medications carry many potential adverse side-effects, particularly in geriatric animals, who most commonly fall into the chronic pain category.
- Chronic pain is distressing to the animal, depressing for pet owners, and frequently results in euthanasia. Euthanasia is very upsetting for pet owners as well as veterinarians and is a major component of compassion fatigue within the veterinary profession. Cannabinoids have been shown to manage chronic pain in dogs successfully and could provide an alternative to euthanasia for many veterinary patients.
- Similarly, as with children and adults, refractory seizures occur in dogs and have also been managed successfully with cannabis products (specifically hemp-derived CBD products).

Veterinarians are allowed to prescribe 'drugs containing cannabis', but they cannot authorize the use of cannabis products. This disconnect puts our patients at a disadvantage and encourages Canadians to seek out unregulated pet products on the black market.

- Like Health Canada, the CAVCM supports a cannabis market that is regulated to ensure the safety of the consumer. We also welcome the development of new 'drugs containing cannabis' that will be suitable for animal use. However, until then, providing a legal pathway to bring cannabis products for animals to market through the medical/retail cannabis channels would help to deter the growing number of unregulated cannabis products being sold to well-intentioned animal owners.

We believe that by giving veterinarians the ability to authorize cannabis use, we can assist with the government's objective of increasing education and awareness, and ensuring it is used responsibly and effectively.

- We want to ensure Canadians are not tempted to purchase illegal on-line cannabis products that purport to improve animal health and that are operating without any government oversight.

As veterinarians, we are privileged to be able to share in the important role that animals play in our lives and are dedicated to alleviating suffering for those that cannot speak for themselves; a component of the veterinarians' oath. We recognize that Health Canada has many issues to address as the legalization of cannabis continues but encourage careful consideration of the issues addressed above.

The CAVCM is thankful for the opportunity to be able to share our thoughts and opinions during this consultation period. With so many companion animals already in desperate need for legal and safe cannabis products, we hope that by working together we can make meaningful changes to improve the health and wellbeing of animals. We are open and available to further discussions on this topic and are happy to provide reference materials upon request.

Sincerely,

The Canadian Association for Veterinary Cannabinoid Medicine

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