

Feb. 13, 2019

Strategic Policy Directorate
Cannabis Legalization and Regulation Branch
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Health Canada
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To whom it may concern,

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

Like millions of other Canadians, we feel strongly about the health and welfare of the animals with whom we share our lives.

The most recent survey of the Canadian Institute of Animal Health reported that Canada is home to 16.5 million dogs and cats, with approximately half of Canadian households home to at least one pet. For many families, these pets are an extension of their family, and their wellbeing is a rising priority.

As Health Canada considers new regulations to govern new cannabis products, we would ask that the health and safety of our pets is not overlooked.

This can be covered in two areas; warning labels on all cannabis products to “keep out of the reach of children and pets”, and the inclusion of veterinarians as healthcare providers with the ability to authorize medical cannabis use for their patients.

Warning labels:

With new categories of cannabis products, including edibles, being implemented in the coming year, it is important that consumers are aware of the risks that these products can pose to animals who inadvertently ingest them. Intoxication caused by THC ingestion can be extremely disorientating and distressing to animals, often results in the need for emergency veterinary care, and can increase the risk of potentially life-threatening complications, such as aspiration pneumonia.

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.

**We would, therefore, urge Health Canada to include animals in the warning label that is currently required on all cannabis products.
(ie. Keep out of the reach of children and animals).**

Access to Cannabis for Medical Purposes:

We would also 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 their patients.

With the growing use of medical cannabis across Canada, it is no wonder that more and more pet owners are inquiring about the potential 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, it is essential that veterinarians be able to be involved in providing guidance and education to their clients on this topic. In order to do so, veterinarians should be provided with a legal pathway through which they can recommend or authorize cannabis use.

While the coming years will no doubt see the development of new 'drugs containing cannabis' that veterinarians could prescribe, animals that are suffering now would benefit from being able to receive medical cannabis, where its use is authorized and overseen by their veterinarian.

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).

Veterinarians should have all treatment options available to them, particularly when treating chronic pain and life-limiting conditions.

- 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 animals at a disadvantage and encourages Canadians to seek out unregulated pet products on the black market.

- Like Health Canada, we support 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 giving veterinarians the ability to authorize cannabis use is in-line with the government's objective of increasing education and awareness and ensuring it is used responsibly and effectively.

- By providing pet owners with a legal pathway to obtain medical cannabis through veterinary authorization, consumers would be encouraged to engage in an educational discussion about responsible use and would have less incentive to purchase illegal on-line cannabis products that purport to improve animal health and that are operating without any government oversight.

Animals play an important role in the lives of Canadians. 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.

We are 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.

Sincerely,