

## Executive Summary

The Canadian Medical Cannabis Council (CMCC) represents stakeholders who are committed to advancing the highest standards of integrity, safety, quality, access, security and research within Canada's medical cannabis industry.

Members of CMCC have created, and abide by, the world's first professional Code of Ethics designed to serve the best interests of medical cannabis patients. CMCC is committed to serving the needs of patients and works closely with its internal Patient Advisory Council, which includes representatives from The Arthritis Society of Canada, the Canadian Epilepsy Alliance, the Canadian AIDS Society, the Canadian Palliative Hospice Care Association, the Wellness Soldier, Canadians for Fair Access to Medical Cannabis, the Canadian Cancer Survivor Network, and Improving the Lives of Children Foundation.

The CMCC is an important voice to ensure that access to medical cannabis and other issues around medical cannabis as they pertain to patient safety and access are considered in the process of developing the regulations for the industry.

In addition to this submission we have also provided a formal written submission to the Task Force on Marijuana Legalization and Regulation.

## Overview

The CMCC is committed to ensuring patients are accessing a safe and reliable product. The CMCC works with licensed producers who abide by the strict standards for health and safety in production to ensure patient safety. Going forward, the rigorous requirements for production, packaging, storage and distribution of cannabis under the *Marihuana for Medical Purposes Regulations* must be maintained in order to ensure quality and safety for patients.

## Structure of Recreational Regime

It is important to maintain the regulated framework that currently exists in Canada to ensure patients are receiving reliable, safe product.

In order to replace the black market, a licensing system that allows producers to respond to the non-patient (i.e. recreational) consumer market is desirable. CMCC believes the best system minimizes the appeal of black market cannabis, which poses health risks due to their unknown composition and provenance. Without this ability, the black market system that exists today will continue to dominate for recreational users, posing a danger for public health.

## Zero-Rated Products

Cannabis must be treated like any other medicine. This objective can be achieved by ensuring health-insurance coverage for the product and designating medical cannabis as a zero-rated substance for tax purposes. Further, it will be important to differentiate between the medical and recreational systems by putting in place different taxation strategies, and zero-rating



cannabis is in keeping with the government's goal of treating medical cannabis like any other prescription medication. Zero-rating cannabis will also encourage third-party insurance providers to include coverage for medical cannabis in their plans, something many already do on a case-by-case basis.

In light of research suggesting that medical cannabis use is associated with a decline of absence from work due to sickness<sup>1</sup> and reductions in opioid overdose deaths<sup>2</sup>, an increase in medical cannabis use could lead to significant public health cost savings and reductions in overall morbidity/mortality associated with prescription opioid medications

### **Investment in Research**

Ensuring investment in research and research partnerships to continually improve best practices is crucial for patients who use medical cannabis to manage their conditions. It is important to study and track the impact of cannabis policy changes on crime, impaired driving, ER visits and hospitalizations, and other social measures of public safety and health. Tax revenue from recreational cannabis could be used to fund epidemiological and social research on the impacts of cannabis regulation on a number of these important social measures.

### **Conclusion**

Sustaining the current MMPR regulatory model and providing medical cannabis through licensed producers tax-free for patients is crucial to ensuring that patients have access to safe, reliable, medical grade products. CMCC supports measures that improve patient access, but these measures must be offset by a viable recreational system that minimizes illegal and potentially unsafe products from the marketplace. Further, any measures must ensure that medical products are differentiated from recreational products, both physically and through different taxation and private and public cost-coverage.

CMCC looks forward to the Government of Canada's support and implementation of the recommendations outlined in this pre-budget submission. We would be pleased to participate in any future consultations, engaging both our cohort of licensed producers and our patient advisory council.

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<sup>1</sup> <http://onlinelibrary.wiley.com/doi/10.1002/hec.3390/abstract>

<sup>2</sup> <http://archinte.jamanetwork.com/article.aspx?articleid=1898878>

