



Committee Secretary  
Senate Legal and Constitutional Affairs Committee  
PO Box 6100  
Parliament House  
Canberra ACT 2600

17 March 2015

To whom it may concern on the Committee of the Senate Legal and Constitutional Affairs,

On behalf of Fagron Compounding Supplies Australia, we would like to submit an offer of support to the Legal and Constitutional Affairs Legislation Committee regarding the Regulator of Medicinal Cannabis Bill 2014.

Founded in Rotterdam (The Netherlands) in 1990 by Ger van Jeveren - the current CEO of the Fagron Group - van Jeveren brought market leadership in pharmaceutical compounding in the Netherlands in just 7 years, through a continuous focus on innovation, quality and solution-oriented thinking. Van Jeveren continued to direct further development and international growth, resulting in Fagron being global market leader and active in 30 countries in Europe, the Americas, the Middle East, Africa, Asia, and the Pacific, including Australia. Fagron has an excellent track record of supplying high-quality products over 200,000 pharmacies and hospitals to over 60 countries around the world.

Fagron is the exclusive distributor of medicinal Cannabis in the Netherlands and Germany. Fagron has been the official distributor of medicinal Cannabis in the Netherlands since 2003 and is contracted by the government body, The Office of Medicinal Cannabis (OMC).

In the Netherlands the responsibilities of the OMC are to:

- Ensure constant quality of medicinal cannabis which meets pharmaceutical standards.
- Ensure constant availability of medicinal cannabis
- Prevent leakage to the criminal circuit
- Constant control on the procedure for distribution

With a strict distribution model, the OMC is able to ensure all its responsibilities are addressed. Appendix 1 shows the process by which medicinal cannabis is supplied under the OMC in the Netherlands. By replicating this model, the Australian government could implement a high quality, regulated system for distribution of medicinal cannabis. For this reason, Fagron is in full support of this bill and the formation of the Regulator of Medicinal Cannabis.

In addition to the medical practitioner, member of the Australian Federal Police and representative for patients, we urge the committee to also include a pharmacist as a member of the regulator. Pharmacists are instrumental in the quality assurance of medicines and counselling of patients undergoing the treatment, therefore should be included as part of the Regulator of Medicinal Cannabis in Australia.



Fagron sources the medicinal cannabis from a well-established legal grower located in the Netherlands by order of the OMC. The medicinal cannabis sourced from these growers has a standardised concentration of THC and CBD and a regulated growth process which results in constant quality and would contribute to the safety of using this medication. This grower is in compliance with all international requirements for the legal growth of Cannabis and meets standards of the Good Agricultural Practice (GAP).

With Fagron's extensive experience and the high quality medicinal Cannabis it can supply, we believe Fagron is the best partner for the Regulator of Medicinal Cannabis regarding import and distribution of medicinal Cannabis in Australia. Importing would also accelerate the introduction into the Australian market without comprising the quality and regulation of the product. If the Senate wishes to learn more or seek consultation from Fagron, please find our contact details in the accompanying email and below.

Yours faithfully,

Brianna Knowles  
General Manager  
Fagron Compounding Supplies Australia Pty Ltd

Karlijn Rijkee, pharmacist  
Marketing & Innovation Manager  
Fagron Compounding Supplies Australia Pty Ltd



## Appendix 1 – Production and distribution model of OMC

Our production and distribution model:

1. After taking in the harvest of medicinal cannabis (by an employee of the OMC) the harvest goes to the packager.
2. From every harvest a sample goes to the laboratory to check the medicinal cannabis on pesticides, fungi, heavy metals etc. and also on the THC and CBD-level.
3. After the medicinal cannabis has been packed an employee of the OMC goes to the packager to check and count it.
4. When the lab results are in and ok, the pharmacist of the OMC makes an certificate of analysis and then the batch is ready for sale.
5. Medicinal cannabis is only available on doctor's prescription and only available in the pharmacy
6. A pharmacist can order the medicinal cannabis with a recipe at our pharmaceutical wholesaler
7. The pharmacist provides it to the patient