



The Royal Australasian  
College of Physicians

From the President

16 March 2015

Ms Sophie Dunstone (Committee Secretary)  
Senate Legal and Constitutional Affairs Legislation Committee  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Via Email: [legcon.sen@aph.gov.au](mailto:legcon.sen@aph.gov.au)

Dear Ms Dunstone

### **Inquiry into the Regulator of Medicinal Cannabis Bill 2014**

The Royal Australasian College of Physicians (RACP) thanks the Senate Legal and Constitutional Affairs Legislation Committee for the opportunity to provide a submission on the Regulator of Medicinal Cannabis Bill 2014.

The RACP considers that while medicinal marijuana shows some potential for certain patients, further research is required to determine its efficacy and it should be subject to the same scrutiny as any other medicine. The RACP does not support the Bill because while we understand it covers activities beyond the scope of the Therapeutic Goods Act 1989 (the TGA), we believe sections of it are inadequate compared to the functions of the TGA to monitor and regulate the quality and safety of medicinal cannabis products.

The RACP does not support the Bill because:

- it creates another regulatory body duplicating activities currently undertaken by the TGA
- it does not include monitoring of medicinal cannabis products for adverse events as the TGA does in its current role for registered medicines
- The *Division 4 - Authorised patients and carers scheme*, is insufficient to protect medical practitioners from liability and to guarantee the efficacy and safety of medicinal cannabis products.

Taking into consideration the above objections the RACP supports the intent of the Bill.

Entities conducting research and trials require a safe and secure supply of cannabis, and the RACP recognises regulating and licensing the cultivation, exporting, importing, wholesale trading and stock maintaining of medicinal cannabis is outside the current scope of the TGA.

The RACP's preference would be for an alternative approach that recognised the role of the TGA and established a process that enabled researchers to comply with Articles 23 and 28 of the Single Convention on Narcotic Drugs, 1961.

Thank you for the opportunity to comment on this Bill. For further information or to discuss this issue further please contact Veronica Vogel, Policy Officer, at

Yours sincerely

Laureate Professor Nicholas J Talley