February 28, 2013

Hon. Leona Aglukkaq, PC, MP
Federal Health Minister
Health Canada
70 Colombine Driveway, Tunney’s Pasture
Ottawa, Ontario K1A 0K9
minister_Ministre@hc-sc.gc.ca

Dear Minister Aglukkaq:


The CMA’s position on these proposed changes, and indeed on the entire Medical Marihuana Access Program, has been consistent since the program was initiated. The CMA is deeply concerned that there remains scant evidence regarding the effectiveness of the herbal form of marijuana (i.e., smoked) as accessed through Health Canada’s program.

The CMA has always acknowledged the unique requirements of those individuals suffering from a terminal illness or chronic disease for whom, in the absence of effective conventional therapies, marijuana for medicinal purposes may provide relief.

However, as currently proposed, the Marihuana for Medical Purposes Regulations do not contribute to improving patient care or advancing our clinical knowledge of marijuana as a medical treatment. In the attached brief, the CMA identifies a number of areas in which the regulatory proposal falls short.

- Health Canada proposes to remove itself from the approval process and place health professionals in the role of gatekeeper;
- The proposed regulations introduce new concerns about the privacy of health information and physician data;
- The proposed regulations would allow authorized health care practitioners to “sell, provide or administer dried marijuana,” which runs contrary to the CMA Code of Ethics.

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The CMA once again encourages the federal government to focus on the advancement of scientific knowledge about medical marijuana and ensure that the same safety and evidence standards that apply to pharmaceutical products under the Food and Drugs Act also apply to medical marijuana. Recent polling indicates that the CMA’s recommendations are aligned with the views of Canadians. We urge that Health Canada take the views of Canadians and physicians into consideration. This would require significant revision to this proposal.

Sincerely,

Anna Reid, MD, CCFP(EM)
President

Encl. CMA Response to Health Canada’s Medical Marihuana Regulatory Proposal

cc. Ms. Glenda Yeates, Deputy Minister, Health Canada
c. Dr. Heidi Oetter and Ms. Fleur-Ange Lefebvre, Federation of Medical Regulatory Authorities of Canada