

21 November 2024

Prof Tony Lawler
Deputy Secretary
Therapeutic Goods Administration

By email: [REDACTED]

Subject: Medicinal cannabis concerns

Dear Prof Lawler

AMA Queensland, the Royal Australian and New Zealand College of Psychiatrists (RANZCP, Queensland Branch) and the Pharmacy Guild of Australia, Queensland hold serious concerns about the rapid increase in medicinal cannabis use across our state.

A 2023 RANZCP report has shown Queensland's rate of prescribing of medicinal cannabis products is higher than that of all other jurisdictions combined, with 167,000 scripts issued since licensing began in 2016 compared with 156,000 combined across Victoria, New South Wales, Western Australia and South Australia over the same period.

Patients, particularly those with psychotic illnesses, are suffering significant adverse health outcomes from inappropriate prescribing and use of products with highly potent concentrations of tetrahydrocannabinol (THC).

Even patients without previous histories of mental illness are presenting to our emergency departments with psychosis after using these substances.

It is our view that current controls are inadequate, including the TGA's standards for regulating medicinal cannabis products and their THC concentrations.

We are particularly concerned about medicinal cannabis business models that do not appear to have appropriate clinical governance and regulatory oversight to maintain professional standards for clinicians, do not meet the Medical Board of Australia's telehealth guidelines and engage in direct consumer marketing.

We also remain alarmed that these products continue to be prescribed for conditions for which there is no evidence, including anxiety, insomnia and chronic pain and for patients with comorbidities or who are taking other medicines where use of medicinal cannabis is contraindicated.

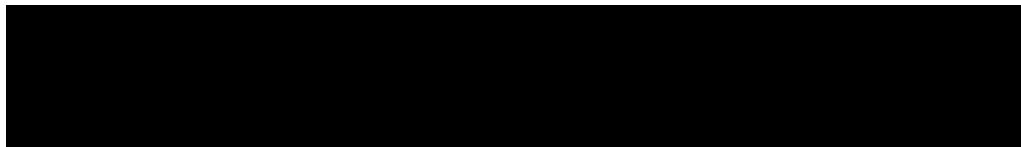
We are aware the TGA is discussing these issues with many agencies including Ahpra and different practitioner boards, but doctors and pharmacists remain largely unaware of this work or the issues with medicinal cannabis use.

Our organisations ask you to provide more information to health practitioners about appropriate prescribing of medicinal cannabis products and take action to improve its regulation, particularly the concentrations of THC allowable under relevant legislation.

The inclusion of medicinal cannabis in the TGA's Special Access Scheme (SAS) is also contributing to inappropriate use and we likewise recommend it be removed from the SAS and regulated in the same manner as all other drugs of dependence.

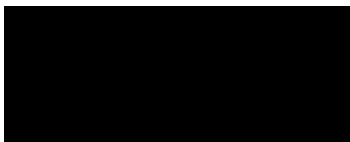
We would welcome an opportunity to meet with you to discuss this issue further.

Yours sincerely



Dr Nick Yim
President
AMA Queensland

Prof Brett Emmerson
Chair, Queensland Branch
The Royal Australian and New
Zealand College of
Psychiatrists



Chris Owen
President,
The Pharmacy Guild of Australia,
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Copied to:

Adj Prof Robyn Langham, Chief Medical Advisor, TGA:

