

4 March 2025

The Hon Mark Butler MP Minister for Health and Aged Care Canberra

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The Hon Chris Picton MP Minister for Health and Adelaide

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Dear Minister Butler and Minister Picton

## Re: A national approach to the regulation of medicinal cannabis

As President of the Australian Medical Association in South Australia, I write on behalf of our member clinicians, many of whom have voiced to me and our leadership their serious concerns about the increasing use of unregistered medicinal cannabis in South Australia and the impacts of this on the safety of patients and treating health practitioners. This is an increasingly disturbing issue that requires a national approach to its resolution. As such, we seek discussion of this matter by Australian, state and territory health ministers as a matter of urgency.

In writing to you, I am reinforcing concerns I know have been raised by AMA Queensland members and our colleagues in the Royal Australian and New Zealand College of Psychiatrists (RANZCP, Queensland Branch), the Royal Australian College of General Practitioners, Queensland (RACGP), and the Pharmacy Guild of Australia in Queensland. However, this is a matter causing concern to clinicians across the country.

In South Australia, AMA members have alerted me to distressing incidents of patient harm and adverse outcomes resulting from inappropriate use of medicinal cannabis. Emergency physicians report that 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).

Our members consider current controls of medicinal cannabis, including the TGA's standards for regulating medicinal cannabis products and their THC concentrations, to be inadequate. We are aware of 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 marketing to consumers who may not understand the risks involved. We are also 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.

As our Queensland colleagues have advised you, the Therapeutic Goods Administration (TGA) is aware of this issue and its implications for patient safety. However, it appears any action by the TGA may be delayed by necessary requirements for consultation with and across jurisdictions. As such, we ask that the nation's health ministers add this matter to the agenda of your next meeting and that you consider measures to ensure patient safety.

We support AMA Queensland in recommending key issues for consideration at a national level:

- impacts of increased use of unregistered medicinal cannabis, particularly at high concentrations, on public hospitals, including presentations, resourcing and occupational violence
- exclusion and/or reduction of THC concentrations
- time-dependent dispensing volume limits per patient (e.g., a reduction from 90 grams to 30 grams per week)
- · removal from the Special Access Scheme
- improved labelling of medicinal cannabis products
- real-time prescription monitoring (noting there are currently no registered products)
- limiting authorised prescribers to medical practitioners with specialist registration
- banning vertical integration and other aspects of medicinal cannabis business models that risk patient safety and clinical independence
- training and eligibility requirements for prescribers, including safeguards for telehealth consultations.

In summary, we ask that you take action to introduce a national approach to improving the regulation and concentrations of medicinal cannabis and its distribution.

I am happy to discuss or provide further information about this issue at any time. I can be contacted via EA Alex Brown on 8361 0109 or at abrown@amasa.org.au.

Yours sincerely

President

Dr John Williams

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