



CANADIAN VETERINARY
MEDICAL ASSOCIATION

L'ASSOCIATION CANADIENNE
DES MÉDECINS VÉTÉRINAIRES

February 20, 2019

Strategic Policy Directorate
Cannabis Legalization and Regulation Branch
Address locator: 0302B
Health Canada
Ottawa, Ontario
K1A 0K9

via email: cannabis@canada.ca

Re: HC Open Consultation on Cannabis Edibles/Extracts/Topicals

The Canadian Veterinary Medical Association (CVMA) is the national and international voice for Canada's 13,300 veterinarians. Its membership comprises Canada's authoritative expertise on veterinary science, animal health and welfare, and veterinary public health. The CVMA facilitates the development of unified viewpoints on issues for which the veterinary profession advocates, and in which it believes. The CVMA members include licensed veterinarians working in all of Canada's provinces and territories as private general practitioners, specialists, researchers, educators, and public servants. They provide unique expertise in regard to the health and welfare of all animals including companion animals (such as cats, dogs, and horses), food-producing animals (livestock, poultry, aquaculture), zoo and laboratory animals, among others. In addition, the CVMA is affiliated with the Registered Veterinary Technologists and Technicians of Canada (RVTTC) representing over 7,300 registered veterinary technicians/technologists.

Established by an Act of Parliament in 1948, the CVMA remains a leading advocate for animal welfare in Canada, through actively advocating for and promoting the humane raising and handling of animals, nurturing the human-animal bond, and developing relevant position statements and decision support tools on, for example, pain control in animals and extra-label drug use. The latter represents an important and legal strategy in the effective and efficient treatment of animals by licensed veterinarians when an approved veterinary product is not available or suitable. The recent increase in medical cannabis used to relieve human suffering as well as the legalization of recreational cannabis and the anticipated availability of topical, oil and edible products in the fall of 2019 have drawn attention to the potential benefits of use in veterinary medicine. Veterinarians are now frequently fielding questions from companion animal owners, livestock producers, and others about the potential therapeutic benefits of using cannabis in animals for reasons such as the alleviation of pain, relief of anxiety, and treatment of behavioral conditions. With ongoing research and new products under development, the CVMA anticipates that cannabis and its derivatives will play an increasingly important role in veterinary medicine in Canada over the coming months and years.

canadianveterinarians.net
veterinairesauCanada.net

339, rue Booth Street
Ottawa (Ontario) K1R 7K1

t • (800) 567-2862
f • (613) 236-9681
admin@cvma-acmv.org

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CanadianVeterinaryMedicalAssociation



@CanVetMedAssoc | @Assoccanmedvet



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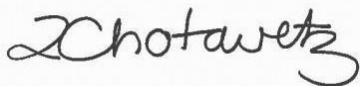
@cvma.acmv

Many of the issues discussed in the consultation paper do not directly relate to the concerns of veterinarians; therefore, the CVMA will limit its comments to those that directly impact its members. The CVMA respectfully submits the following comments and/or suggestions which were originally brought forward by the CVMA in its letter to Health Canada dated January 19, 2018.

- 1) Regarding the sale and access of cannabis for medical purposes, the CVMA strongly urges that Part 14 of the Cannabis Regulations – Access to Cannabis for Medical Purposes be amended to allow veterinarians to provide necessary medication to their patients, while maintaining an arms-length oversight on its dispensing. Veterinarians wish to avoid situations whereby owners purchase cannabis products for animal use without the appropriate guidance and controls, as they would most likely do if forced to purchase from non-medical sellers. The latter would be their sole option if Part 14 of the Cannabis Regulations is not amended to include veterinarians (and their patients). The CVMA suggests that Part 14 of the Cannabis Regulations be amended to include all medical professionals experienced in prescribing controlled substances and/or botanical medicines, including veterinarians. The CVMA would appreciate the opportunity to continue discussions on this and other related matters with your office at your convenience.
- 2) Regarding labeling, in the United States where some states have legalized cannabis, there has been a significant rise in reports of ingestion and toxicity in animals, particularly dogs. There is evidence suggesting that the species is very sensitive to tetrahydrocannabinol (THC). Given the apparent increased risk that THC-containing products have to pets, and the likelihood that edible and topical products will be particularly appealing to pets, the CVMA respectfully requests that a warning statement be included on THC-containing products (e.g., “keep out of reach of animals”).

In closing, the CVMA would once again like to thank you for the opportunity to provide feedback and suggestions. Please note that the CVMA staff and members are available for further discussion on these suggestions at your convenience.

Sincerely,



Dr. Terri Chotowetz
President Canadian Veterinary Medical Association

SR:TC/ds