



7 August 2019

Ministry of Health
PO Box 5013
Wellington 6011
By email: medicinal_cannabis@health.govt.nz

Dear Sir/Madam

Re: Medicinal Cannabis Scheme consultation

The New Zealand Society of Anaesthetists (NZSA) welcomes the opportunity to comment on the proposed Medicinal Cannabis Scheme.

About the NZSA

The NZSA is a professional medical education society, which represents over 650 medical anaesthetists in New Zealand. Our members include specialist anaesthetists in public and private practice, and trainee anaesthetists. We facilitate and promote education and research into anaesthesia and advocate on behalf of our members, and the safety of their patients. As an advocacy organisation, we develop submissions, work collaboratively with key stakeholders, and foster networks of anaesthetists nationwide. The NZSA, established in 1948, also has strong global connections and is a Member Society of the World Federation of Societies of Anaesthesiologists (WFSA).

Comments

The NZSA supports the position of the Australian and New Zealand College of Anaesthetist's Faculty of Pain Medicine (FPM). FPM's position is outlined in its position statement PM10, dated 19 February "*Medicinal Cannabis with particular reference to its use in the management of patients with chronic non-cancer pain*" and its submission on this consultation, that the scientific evidence for the efficacy of cannabinoids in the management of people with chronic non-cancer pain is insufficient to justify endorsement of their clinical use.

The proposed Medicinal Cannabis Scheme seeks to support the cultivation of cannabis and manufacture of 'medicinal cannabis.' Evidence to date of the safety and efficacy if medicinal cannabis is limited. We concur with the view of FPM that "the focus should first be on determining, as for other medicines, the safety and efficacy of cannabis for use in treating patients."



Therefore, introduction of the proposed scheme is premature. The same safeguards and processes we have in place to regulate prescription medicines in New Zealand, covering quality, safety and efficacy, must also be applied to medicinal cannabis.

We would draw your attention to a point made by the New Zealand Medical Association. The recent consultation on the Therapeutic Products Bill stated that *"the intention under the Therapeutic Products Bill is to try to minimise the use of unapproved medicines in New Zealand"*. We agree that it is of concern that an expected outcome of the medicinal cannabis scheme runs directly counter to the objectives of the new Therapeutic Products Bill.

Yours sincerely

A handwritten signature in black ink, appearing to read "Kathryn Hagen", with a long horizontal flourish extending to the right.

Dr Kathryn Hagen
President