

**Canada Gazette, Part I, Volume 158, Number
23: Regulations Amending Certain
Regulations Concerning Cannabis
(Streamlining of Requirements)**

Commentary – July 8, 2024

**Submitted by:
Arthritis Society Canada
Canadian Arthritis Patient Alliance**



Thank you for the opportunity to provide input into the Consultation on Potential Amendments to the Cannabis Regulations. Although this consultation is not considering cannabis for medical purposes, we wish to reiterate some of the Expert Panel recommendations related to cannabis for medical purposes that should be incorporated in the regulatory development stage.

Arthritis Society Canada is a national charity dedicated to extinguishing arthritis. We represent the six million Canadians living with arthritis today, and the millions more who are impacted or at risk. The Canadian Arthritis Patient Alliance (CAPA) is a grassroots, patient-driven and managed, independent, national education and advocacy organization that creates links between Canadians with arthritis, assists them to become more effective advocates and seeks to improve the quality of life of all people living with the disease.

For many people living with the fire of arthritis, medical cannabis is an important pain management option. About 1 in 4 Canadian adults using medical cannabis use it to manage arthritis, specifically. Arthritis can cause excruciating pain, limit the ability to walk and move, interrupt sleep, and significantly diminish quality of life for patients, caregivers and families. Arthritis is a leading cause of long-term disability in the country and can severely impact a person's ability to participate in the labour force. With a growing and aging population, the number of Canadians living with arthritis is expected to grow to more than nine million by 2040.

Regulatory Development Commentary

Pharmacy Access: To further support patients, pharmacists should be given the authority to prescribe and dispense medical cannabis. This will create a clear distinction between medical cannabis and cannabis for recreational/non-medical use and help ensure that patients receive reliable education on the safe and effective use of medical cannabis from trained health care professionals. Distribution through pharmacy would also assist with appropriate dosing, tailoring it to the patient. Pharmacy access can also help facilitate reimbursement by health insurance plans.

Taxation: Cannabis for medical purposes is authorized by healthcare practitioners as medicine but is not treated as such in key aspects of policy around access and affordability. While the regulations state that taxation is in the purview of the CRA, noting the impact of tax on medical cannabis for patients who use it for their health should be considered by Health Canada. The costs associated with the use of cannabis for medical purposes (sometimes upwards of \$500/month) can put an enormous financial strain on many patients. In combination with limited insurance coverage, the taxation of cannabis for medical purposes presents additional access barriers to this effective form of treatment. It is also inconsistent with the taxation of prescription drugs and medical necessities, which are zero-rated under the *Excise Tax Act*.

We encourage the government to take these recommendations into consideration and continue to engage with patients on the regulations.

