

Updated Information on Cannabis, July 2019

Understanding the Cannabis Act and Regulations:

- The Cannabis Act regulates the sale and possession of cannabis
- Health products that contain phytocannabinoids are listed on the Human and Veterinary Prescription Drug List
- Under the Act, veterinarians are permitted to prescribe and dispense such drugs containing phytocannabinoids, whether human or veterinary label. Current human prescription products containing phytocannabinoids (e.g. Sativex) are often not appropriate for veterinary use.
- Currently, the Veterinary Drugs Directorate at Health Canada has indicated that they have approved clinical trials for veterinary drugs containing phytocannabinoids, but it could take 6 to 10 years for any to come to market
- The Cannabis Act, Part 14, Cannabis for Medical Purposes applies to human patients; accordingly, a human healthcare practitioner (physician or nurse practitioner) can provide an authorization to their patient to access cannabis for medical purposes. Part 14 does not currently apply to veterinarians and their animal patients.
- Canadian consumers may legally purchase recreational cannabis from authorized provincial retail sales outlets. These products:
 - Are not drugs and as such must not be accompanied with human or veterinary health claims;
 - Are packaged and labelled according to strict rules set by Health Canada ¹;
 - Have packaging with a Canada Revenue Agency (CRA) excise stamp ²; and
 - Undergo quality control testing to ensure, among other things, that concentrations of CBD and THC that are indicated on the label are accurate, and that the products are free of specified contaminants (e.g. certain pesticides).
- The only approved cannabis products for animals available at this time are Veterinary Health Products made from hemp. These products:
 - Are exempt from the Cannabis Act as they contain <10 ppm THC;
 - Are regulated by the Industrial Hemp Regulations (IHR);
 - Have no concentrated phytocannabinoids, including CBD;
 - Do not make health claims;
 - Are sold at retail; and
 - Are distinguished from unapproved cannabis products labelled for animal use by a Notification Number assigned by Health Canada ³.

Guidance for Canadian Veterinarians:

- Since legalization, Canadian veterinary regulators have been supportive of veterinarians having informed discussions with clients about the potential use and toxicity of cannabis products in animals.
- Veterinarians may recommend and/or sell Veterinary Health Products with hemp that are approved by Health Canada.
- Veterinarians may advise clients on the use, including potential risks and benefits, of legally available recreational cannabis products for their pets:

From the Canadian Council of Veterinary Regulators (CCVR) Cannabis Working Group

- It is important that veterinarians recognize that these products are not indicated for animal use; they are not drugs (and so cannot be prescribed) and no health claims are made.
- Products will not be labelled with animal safety in mind (e.g. keep out of reach of pets)
- The scientific evidence with respect to the safety and efficacy of the use of cannabis products in animals is growing but remains limited.
- Veterinarians are accountable for any professional advice they provide to a client about their animal.
- Due to third party distribution of products in the recreational market, veterinarians should be vigilant in making recommendations and confirm the product obtained is appropriate for use.
- Veterinarians are not obligated to advise on use of cannabis products if they do not believe it is clinically appropriate.
- Veterinarians who choose to provide advice should seek up to date information on cannabis use in animals through, for example, the scientific literature or continuing education
- If a veterinarian chooses to advise on the use of a legal recreational cannabis product in an animal, they:
 - Must practice within the scope of their clinical competency;
 - Must weigh the evidence against other available treatment options;
 - Must consider the known or suspected risks associated with its use in animals;
 - Must obtain informed client consent;
 - Must monitor patients and be available in the event of an adverse reaction or failure of treatment; and
 - Must be aware of the potential for abuse, diversion and misuse of cannabis.

Resources:

1. Cannabis product package and label mock-up: <https://www.canada.ca/en/health-canada/services/publications/drugs-health-products/summary-comments-public-consultation-regulation-cannabis.html#b1.6>

2. Cannabis Excise Stamp (CRA): <https://www.canada.ca/en/revenue-agency/news/cra-multimedia-library/businesses-video-gallery/cannabis-consumers.html>

https://www.canada.ca/en/revenue-agency/services/forms-publications/publications/edn54/general-overview-cannabis-excise-stamps.html#_Toc512931348

3. Veterinary Health Product sample label:

<https://www.lrvhp.ca/public/documents/view/exampleLabel>