



SHPA submission to Inquiry: Improving Access to Medicinal Cannabis Bill 2023, May 2023

The Society of Hospital Pharmacists of Australia (SHPA) is the national, professional organisation for the 6,100+ Hospital Pharmacists, and their Hospital Pharmacist Intern and Hospital Pharmacy Technician colleagues working across Australia's health system, advocating for their pivotal role improving the safety and quality of medicines use. Embedded in multidisciplinary medical teams and equipped with exceptional medicines management expertise, SHPA members are progressive advocates for clinical excellence, committed to evidence-based practice and passionate about patient care.

SHPA convenes a Clinical Trials Specialty Practice Group, comprising of a network of SHPA members who are involved in the provision of a clinical trial or investigational drugs pharmacy service to clinical trial participants in hospitals (private and public) and phase one clinical trial units, and clinical trials pharmacists who also provide a service to research departments. These investigational medicines may include medicinal cannabis with SHPA members furthering the emerging evidence base for the use of these medicines. SHPA members also work in various settings where medicinal cannabis may be prescribed, such as Paediatrics, Neurology, Oncology and Palliative Care settings.

SHPA provides several considerations into medication safety and consumer access to evidence-based medicines prior to approval of the Medicinal Cannabis Bill 2023 (the Bill).

If you have any queries or would like to discuss our submission further, please do not hesitate to contact Jerry Yik, Head of Policy and Advocacy on

Medication safety and equitable access to medicinal cannabis

There has been increasing interest in the use of medicinal cannabis to treat and manage symptoms of various conditions including childhood epilepsy, pain in Multiple Sclerosis (MS), pain associated with arthritis, managing chemotherapy-induced nausea and vomiting in cancer and palliative care. SHPA's hospital pharmacist members work in all of these speciality areas where medicinal cannabis may be prescribed, such as Paediatrics, Neurology, Oncology and Palliative Care. Hospital pharmacists working in these areas provide expert advice for prescribers such as appropriate dosing, treatment options and interactions – all of which are vital pieces of information for new and emerging treatments, where little is known on appropriate dosing and interactions. For example, in paediatric settings, information around the specific dosing would be required with prescribers seeking the expert advice of pharmacists specialising in Paediatric and Neurology.

Due to the emerging evidence base and lack of current clinical guidelines regarding medicinal cannabis, Medicines Information pharmacists in hospital settings play a vital role in ensuring that up to date and evidence-based medicines information is available to both the public and other healthcare professionals, in order for them to make informed decisions around treatment. Funding for Medicines Information Centres has been reducing in recent years with some services having to close, meaning access to this vital service may not be available to all who require it.

SHPA believes that ensuring access to critical medicines is vital to providing equity of treatment to all Australians. However, all medicines approved for therapeutic use must be supported with a robust evidence base with safety guards in place to protect consumers from adverse outcomes.

Access to medicinal cannabis needs to be supported by high quality research and an evidence-based medicine approach. Clinical trials are essential to the development of new treatments, which includes medicines. They facilitate the testing and monitoring of the effect of a treatment across a clinical trial



participant population, to ensure that any benefit from the treatment occurs for many participants, as opposed to being a random effect.¹ Without clinical trials, this cannot be properly determined.

Clinical trials pharmacists lead and organise clinical trials of emerging treatments in hospitals. SHPA's Standard of Practice in Clinical Trials for Pharmacy Services² outlines the key role of clinical trials pharmacists in clinical trials, not only to meet regulatory requirements related to the possession, dispensing and supply of investigational products but also to ensure the safe and ethical use of investigational products, which may include medicinal cannabis.

Approval processes

SHPA acknowledges that the evidence-base for medicinal cannabis is continually growing. With this increase in evidence base, as with any other medicine approval, if the medicine gains registration on the Australian Register of Therapeutic Goods (ARTG), use should be facilitated through safe and equitable access to consumers when they require it. SHPA also recognises the use of non-ARTG medicinal cannabis products, however these products are procured under different pathways by the TGA such as the Special Access Scheme (SAS) and Authorised Prescriber (AP) pathway. Our hospital pharmacist and technician members are logistically involved in these processes, which can be resource intensive and highly complex.

SHPA understands that the re-scheduling medicinal cannabis to a Prescription Medicine (Schedule 4 of the Poisons Standard) will allow for inclusion on the Pharmaceutical Benefits Scheme (PBS) as a separate process. SHPA supports the utilisation of existing medicine approval systems for medicinal cannabis mirroring approval processes of other medicines.

As with all other medication counselling with Pharmacist Only (Schedule 3) medicines, appropriate oversight would be required by community pharmacists to ensure that consumers accessing medicinal cannabis products through a community pharmacy can make informed decisions around their treatment.

Training for healthcare professionals

Pharmacists working in all settings, whether it be in primary practice, hospitals or aged care, will require further education and training on the various formulations of both Prescription Medicine and Pharmacist Only medicinal cannabis products including counselling points, contraindications and interactions with other medications.

In addition, if any prescriber is approved to prescribe medicinal cannabis, further training may be required for prescribers who may not have existing knowledge around medicinal cannabis product formulations, appropriate doses and contraindications. Risk management plans around supply may also need to be considered with respect to frequency of dispensing³ to minimise harms and diversion. Risk management plans around supply may also need to be considered by the prescriber and pharmacist with respect to frequency of dispensing⁴ to minimise harms and diversion.

Support for treatment plans may still be required by a specialist in the particular field for the indication (e.g., palliative care, oncology) and may require consultation with wider members of a multidisciplinary team such as hospital pharmacists.

References

¹ Department of Health and Aged Care. What is a clinical trial? Canberra: Commonwealth of Australia. Available at: <https://www.australianclinicaltrials.gov.au/consumers>

² Slobodian, P., Challen, J., Ching, M., Hong, E., Nikolajevic-Sarunac, J., Shum, B., Vosk, C. and Munro, C. (2020), Standard of practice in clinical trials for pharmacy services. J. Pharm. Pract. Res., 50: 429-444. <https://doi.org/10.1002/jppr.1676>

³ Department of Health. Therapeutic Good Administration. (2017). Guidance for the use of medicinal cannabis in Australia. Available at: <https://www.tga.gov.au/sites/default/files/guidance-use-medicinal-cannabis-australia-overview.pdf>

