



On the Production of Medical Cannabis

19th February 2018

Defining Cannabis and Chemical Constituents

Cannabis is a plant species. Two main Cannabis sub-species are Cannabis Sativa and Cannabis Indica. To date, more than 104 different cannabinoids have been identified in cannabis (ElSohly and Gul, 2014 cited in NAP, 2017). Cannabinoids are a group of psychoactive chemical compounds found in the cannabis plant. Among these, Δ -9-tetrahydrocannabinol (THC) has received the most attention for being responsible for the intoxicated state sought after by 'recreational' cannabis users. Another important constituent within the cannabis sativa plant is cannabidiol (CBD). CBD lacks the cannabis-like intoxicating properties of THC. There is evidence that CBD could potentially be exploited in the treatment and symptom relief of various neurological disorders (NAP, 2017).

Caritas Position on Medical Cannabis

Caritas Malta has already issued its position last December 2017 on Medical vs Recreational Cannabis. Here is a summary:

- **Caritas Malta commends the fact that the legal amendments to facilitate access to cannabis based medication for particular conditions has been completely separated from the discussion on its so called 'recreational use'.**
- *Caritas Malta would like to state our serious concern about any form of legislation of the so called 'recreational' use of cannabis.*
- Caritas Malta expresses a concern that cannabis and/or marijuana (smoked form of cannabis) is being perceived as a panacea (cure-all/magic bullet) for a myriad of medical conditions. This can be even more dangerous when one neglects prescribed medication and when one develops a false hope of healing.
- On the other hand, Caritas fully supports the use of cannabis to alleviate pain and suffering and to contribute to improved health, where robust research indicates it's beneficial use.
- Clarity needs to be established as to how medical cannabis is defined. Cannabis for medical purposes can be prepared from plant extracts or in synthetic form in the shape of oils, pills and vapour.
- In this light we welcome the latest government work to "to widen the scope of article 10 of the Drug Dependence (Treatment not Imprisonment) Act so as to allow prescription of Synthetic cannabinoids, cannabis products produced under Good Manufacturing Practice and to allow prescribing by all licenced medical practitioners who are duly registered in accordance with the Health Care Professions Act".
- One of the most thorough systematic review of literature related to the health effects of cannabis can be found in the following report:

[The Health Effects of Cannabis and Cannabinoids: The Current State of Evidence and Recommendations for Research \(NAP, 2017\).](#)

- Quoting the document “There is conclusive or substantial evidence that cannabis or cannabinoids are effective:
 1. For the treatment of chronic pain in adults (cannabis)
 2. In the treatment of chemotherapy-induced nausea and vomiting (oral cannabinoids)
 3. For improving patient-reported multiple sclerosis spasticity symptoms (oral cannabinoids)

The Production of Medical Cannabis

In line with the above Caritas Malta position is in favour with the use of Medical Cannabis for specific therapeutic indications that are supported by robust research.

However, Caritas Malta recommends that legislation in relation to the production of medical cannabis does have the necessary and adequate safeguards delineated in a detailed manner, to protect the community at large from mismanagement and leakage of cannabis in unsafe hands to the detriment of our community. Such safeguards, amongst others, relate to the location, security, due diligence of companies running such establishments, the initial and ongoing vetting processes in the recruitment of employees (example: precluding persons who have a history of a substance abuse/dependence problem or persons with a history of drug trafficking), the setting up of a national agency to monitor and ascertain that international conventions and standards are being adhered to.

In conclusion Caritas Malta remains hopeful that no undue pressure is exerted to widen the scope of this legislation.