

## Petitioner submission of 15 March 2022

### PE1884/D - Make whole plant cannabis oil available on the NHS or alternative funding put in place

The Cabinet Secretary for Health and Social Care said: “I acknowledge this is not an immediate solution to patients seeking to access these products on the NHS. However, it is I think the lack of evidence on the quality, safety and efficacy of CBPMs that remains the main barrier to these products being prescribed by NHS clinicians. Therefore, the Government continues to support the development of clinical trials to enable clinicians to have the assurances they need to consider prescribing these products on the NHS.”

I don't accept or agree that there is a lack of evidence for the NHS to be allowed to prescribe CBPM's with THC to patients.

I have repeatedly pointed out that there are currently three prescriptions given out to date, these prescriptions have also been handed out for more than 3 years so there's at least this amount of reliable evidence through the NHS.

Furthermore, if there was such a lack of evidence why do these NHS prescriptions exist?

Below is a submission made to Petition PE1884 from the Chief pharmaceutical Officer Alison Strath.

These paragraphs below are taken straight out Alison Strath's submission.

“The regulation, licensing and supply of medicines remain reserved to the UK Government under the Misuse of Drugs Act 1971, and this includes the scheduling of Cannabis Based Products for Medicinal Use (CBPMs). Accordingly, the Scottish Government has no power to alter this while responsibility remains reserved to the UK Government.

Under the current rules, only specialist doctors on the General Medical Council (GMC) specialist register can prescribe cannabis-based products where there is clear, published evidence of benefit. While

CBPMs can be prescribed on the NHS, the majority of specialist doctors have concerns around the safety and efficacy of CBPMs, and the lack of robust evidence on their use, particularly the long-term side effects. The only evidence for efficacy and safety of products containing cannabis extracts in childhood epilepsies relates to Epidyolex®, an isolated cannabidiol which received a licence in September 2019, from the European Medicines Agency. The Scottish Medicines Consortium (SMC) accepted Epidyolex for routine use in conjunction with clobazam for both Lennox-Gastaut Syndrome and Dravet Syndrome in September 2020. This is because CBPMs are unlicensed products, which means that they have not been tested for safety, efficacy and quality through the marketing authorisation (licensing) process in the way that a licensed medicine would have. A doctor is professionally and clinically responsible for any medicine they prescribe and the responsibility that falls on them when prescribing an unlicensed product is greater than when prescribing a licensed medicine. This means that whilst the evidence base remains limited and there is not better clarity of the risks and benefits, specialist doctors will be cautious about prescribing unlicensed CBPMs. It is only by building this evidence base that doctors will gain the confidence to prescribe them.

With regards to increasing prescribing of CBPMs on the NHS, the Scottish Government is fully aware of the importance of a robust evidence base in reaching a long-term solution. On 8 April 2020, the former Chief Pharmaceutical Officer for Scotland chaired a teleconference with key paediatric neurologists from the specialist centres across Scotland. The specialist doctors had a clear and united view (which I understand to be a UK-wide view) that following GMC and British Paediatric Neurology Association (BPNA) guidelines, they would be unwilling to prescribe any CBPMs containing tetrahydrocannabinol (THC) until there is clear, published, evidence available following a clinical trial.”

This is the reason I don't agree that there is not enough evidence to prescribe CBPM's with THC, because if this were to be the case the NHS has gone against all guidelines and laws set out for prescribing unlicensed medications and are producing three prescriptions on the NHS.