



CANADIAN VETERINARY  
MEDICAL ASSOCIATION  
L'ASSOCIATION CANADIENNE  
DES MÉDECINS VÉTÉRINAIRES

March 30<sup>th</sup>, 2021

The Honourable Patty Hajdu, Minister of Health  
Health Canada  
Address Locator 0900C2  
Ottawa, ON  
K1A 0K9

Re: Cannabis Act Review and the Veterinary Profession

via e-mail:cannabis@canada.ca

Dear Minister Hajdu,

The Canadian Veterinary Medical Association (CVMA) is the national and international voice for Canada's 12,700 veterinarians. Its membership comprises Canada's authoritative expertise on veterinary science, animal health and welfare, and veterinary public health. CVMA members include licensed veterinarians working in all of Canada's provinces and territories as private general practitioners, specialists, researchers, educators, and public servants. In addition, the CVMA is affiliated with the Registered Veterinary Technologists and Technicians of Canada (RVTTC) representing over 9,400 registered veterinary technicians/technologists.

The CVMA remains a leading advocate for animal welfare in Canada; through actively advocating for and promoting the humane raising and handling of animals, nurturing the human-animal bond, and developing relevant position statements and decision support tools on, for example, pain control in animals and extra-label drug use. The latter represents an important and legal strategy in the effective and efficient treatment of animals by licensed veterinarians when an approved veterinary product is not available or suitable.

At the time of legalization of cannabis in Oct 2018, Health Canada announced that the Cannabis Act would be scheduled for a complete review after three years. The CVMA has been advised by the office of the Health Minister that this would be the most likely time to include amendments to the Cannabis Act to include the concerns of the veterinary profession. Since such a time line would bring the review to October 2021, we respectfully request that issues of the veterinary profession has already brought to the attention to Health Canada (<https://www.canadianveterinarians.net/documents/cvma-letter-to-health-canada-open-consultation-on-cannabis-edibles-extracts-topicals>) be considered without delay.

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CVMA's two principal concerns remain:

- Cannabis product labels do not yet include a warning to “Keep out of the reach of pets”. Because of the known risks of pets consuming products with THC, the CVMA and the Canadian Association of Veterinary Cannabinoid Medicine (CAVCM) (<https://www.cavcm.com/>) have both actively advocated for change. Unfortunately, without updated labels, companion animals remain at increased risk of experiencing toxic effects from being given cannabis products, especially edibles.
- Veterinarians do not yet have a legal pathway to authorize medical cannabis use for their patients, as physicians and nurse practitioners do, despite the legalization of medical cannabis in 2001 and cannabis for recreational use in 2018.

The CVMA holds that accessing cannabis products through the medical pathway, versus what clients might obtain themselves through the recreational pathway, offers benefits to veterinary healthcare professionals, their clients and their patients, including:

- The ability to provide more complete disclosure about the cannabis product that is important to predicting and tracking therapeutic responses (information is often included on minor cannabinoids and terpenes as well as CBD and THC).
- A broader choice of products for medical use.
- Allowing cannabis producers to offer patient support and discuss product differences and how those may affect patient health.
- More stringent quality control from batch to batch.
- The ability to differentiate purpose of use which may allow for products to qualify for insurance re-imburements in the future.

We therefore ask that you consider amending the Cannabis Regulations to include veterinarians as health care practitioners able to authorize medical cannabis for their patients and to include pets on the warning label for all cannabis products containing THC, particularly edible products.

Representatives of the CVMA would welcome the opportunity to meet with you and your advisors at this critical time to review the concerns of our profession and to address any questions you might have.

We respectfully request that your officials contact Mr. Jost am Rhyn ([jamrhyn@cvma-acmv.org](mailto:jamrhyn@cvma-acmv.org)), Chief Executive Officer of the CVMA to arrange a meeting at your earliest convenience.

Sincerely,



Dr. Enid Stiles  
President  
Canadian Veterinary Medical Association

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SR:ES/lm