

Victorian Law Reform Commission  
GPO Box 4637  
**MELBOURNE VIC 3001**

To Whom It May Concern:

**MEDICINAL CANNABIS ISSUES PAPER**

Thank you for seeking comments on the Medicinal Cannabis Issues Paper. The Eros Association commends the government for committing to this public consultation process with the aim of the Victorian Law Reform Commission providing options for the legalisation of medicinal cannabis in Victoria.

As you may be aware, the Eros Association is a membership-based not-for-profit industry body for Australia's adults-only businesses. Our membership includes adult retailers and suppliers, tobacconists and other small businesses relating to adults-only products or services.

The association wrote a recent submission to the Senate Legal and Constitutional Affairs Committee in support of an independent regulator for medicinal cannabis that sits outside of the Therapeutic Goods Administration. This regulator, with an independent committee of relevant professionals, would provide a method of sensibly regulating medicinal cannabis. However, given the political momentum of this issue in Victoria, we believe that a state-based independent regulator be established. Furthermore, when considering the significant knowledge that will be gained by having a Victorian regulatory body, it would be appropriate that this body streamline the dissemination of research and information about cannabis broadly. This would include facilitating education to the community and to distributors of the medicinal products.

Eros Association members are concerned that if distribution is heavily restricted, many patients could have a lot of difficulty securing supply, particularly if a pharmacy owner has a conscience objection to providing medicinal cannabis due to personal beliefs. This is exemplified by some pharmacists refusal to sell condoms, birth control and/or supply of male erection enhancement medicines.

Many of the already existing medicines containing synthetic cannabinoids are unaffordable and their application is limited. Inability to source an affordable product may cause patients to turn to self-cultivation or the black market (i.e. a non-regulated product with no quality or consistency controls).<sup>1</sup> Allowing medicinal cannabis dispensaries to set up without overbearing red tape would ensure that the supply chain effectively meets demand, avoiding market failures that would negatively impact patient's health.

We look forward to the results of the consultation.

Yours sincerely,

Joel Murray  
Business Manager

Nick Wallis  
Social Tonics Researcher

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<sup>1</sup> Mather LE, Rauwendaal ER, Moxham-Hall VL and Wodak AD, '(Re)introducing medicinal cannabis', *Medical Journal of Australia*, 199(11), 2013, p 759.