

COLLEGE OF NATUROPATHIC PHYSICIANS OF BRITISH COLUMBIA

July 24, 2014

Dear Registrant,

We write in reference to a Vancouver Sun article published July 19, 2014, concerning a reporter's consultation with a number of naturopathic physicians in reference to obtaining cannabis for medical purposes. Cannabis is a federally controlled substance under the *Controlled Drugs and Substances Act*, S.C. 1996, c. 19 (the "CDSA").

The College of Naturopathic Physicians of BC ("the College") has published information on its website advising registrants that naturopathic physicians do not have authority to prescribe cannabis. This information is contained in the "Scope of Practice for Naturopathic Physicians: Standards, Limits and Conditions for Prescribing, Dispensing and Compounding 'Drugs' policy posted on the home page of the College's website. This information has been available on the College website since naturopathic physicians were first granted prescribing authority in 2010.

The current federal Marihuana for Medical Purposes Regulation (the "MMPR") outlines the approved methods for patients to receive cannabis for medicinal purposes. As naturopathic doctors are <u>not</u> authorized "health care practitioners" under the current MMPR, they are <u>not</u> authorized to prescribe cannabis <u>nor</u> issue medical documents to patients seeking medicinal cannabis. Nurse-practitioners were the only profession added to the list of authorized "health care practitioners" under the MMPR. The local "dispensaries" referred to in the Vancouver Sun article are also not authorized under the MMPR to distribute cannabis.

As a consequence, a letter or referral form signed by a naturopathic physician to a local "dispensary" for medicinal cannabis has no legal authority.

If you are signing letters or referral forms recommending that patients receive medicinal cannabis from "dispensaries" that are not authorized under the *MMPR*, you are required to immediately refrain from doing so.

Any complaints concerning the issuance of recommendations or referral forms for medicinal cannabis by a registrant of this College will be referred to the Inquiry Committee of the College for investigation under Part 3 of the Health Professions Act, RSBC 1996, c. 183. If the investigation reveals that the complaint is substantiated, the registrant will face regulatory action that may include a discipline hearing. Registrants who provide recommendations for cannabis should also be aware that they risk criminal and/or civil liability.

If you have not already done so, you must immediately familiarize yourself with the "Scope of Practice for Naturopathic Physicians: Standards, Limits and Conditions for Prescribing, Dispensing and Compounding Drugs" policy available on the home page of the College's website at www.cnpbc.bc.ca and ensure that you are in compliance with it.

Yours truly,

Howard Greenstein, B.Sc., M.A., M.B.A.

Registrar & CEO