

Guidance Document for CBD Use on Companion Animals: Canada

*As approved by the AAVSB Board of
Directors in June 2022*



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Introductory Report and Guidance

The American Association of Veterinary State Boards (AAVSB) provides programs and services to its Member Boards through many vehicles. One such mechanism is through the development and continued review of model documents and language, including model statutes and regulations/rules. This, of course, includes the AAVSB Practice Act Model (PAM). As a collective voice and with respect to the Jurisdiction's rights, the AAVSB promotes uniformity where appropriate and provides model language based upon the collective input and consensus achieved through AAVSB committee and task force efforts. The Regulatory Policy Task Force (RPTF) was originally asked to explore potential amendments to the PAM related to the use and/or recommendation of Cannabidiol (CBD) products in veterinary practice. After much research and due to the inconsistency between U.S. federal law and policy and jurisdiction laws along with the criminality aspects of the topic, the RPTF elected to submit the guidance document "*AAVSB Guidance Document for CBD Use on Companion Animals*" rather than to continue to explore proposed amendments to the PAM. Furthermore, due to the vast differences in CBD laws between Canada and the United States, the RPTF releases this separate guidance document for CBD use on companion animals created specifically for Canadian Member Boards.

On October 17, 2018, Canada's Cannabis Act (Bill C-45) came into effect. This Act legalized recreational cannabis use nationwide, and at the same time the criminal code was amended to decriminalize cannabis possession under 30 grams. The ability for adults to access and possess regulated, quality-controlled, legal cannabis is the main purpose of the *Cannabis Act and Regulations*.¹ Currently, legal cannabis is produced and available to adults to use for medical reasons or recreationally.

The *Cannabis Act, Part 14, "Cannabis for Medical Purposes"* allows a human healthcare practitioner (physician or nurse practitioner) to provide an authorization to their patient to access cannabis for medical reasons. However, Part 14 does not currently apply to veterinarians and this is not a way to access legal cannabis for animal patients.

Currently there are no approved medications with cannabis to treat animals in Canada. Under the *Cannabis Act and Regulations*, cannabis for animals to treat health conditions must

be approved as a drug by Health Canada and this includes cannabidiol (CBD). In addition, drugs for animals are only available by prescription from a veterinarian. Under the *Cannabis Act*, veterinarians are permitted to prescribe and dispense Health Canada approved drugs containing CBD whether human or veterinary label. In Canada, products that contain cannabis derived from hemp are regulated under the Industrial Hemp Regulations (IHR). Products for animals are called “Veterinary Health Products,” are made from hemp, and they are exempt from the Cannabis Act as they contain <10 ppm delta-9-tetrahydro-cannabinol (Δ9-THC). They have no concentrated phytocannabinoids, including CBD, and do not make health claims.

As this continues to be an evolving regulatory area, the AAVSB intends these Guidelines to be a fluid document that can change and be updated in a timely manner to address the ever-changing climate of this issue. These Guidelines are not the standard of care for the use of cannabis, but rather an outline of what must be considered on a case-by-case basis by the Member Board. The ultimate responsibility and liability of discussing the use of cannabis lies with the licensee.

The intent of these Guidelines is to act as a resource for licensees and clients to refer to as a basis for the use of cannabis for companion animals.

Definitions

For the purpose of these Guidelines the following definitions are provided:

- **Phytocannabinoids** are the active ingredients in the cannabis plant.
- **CBD** means cannabidiol, the phytocannabinoid associated with therapeutic uses.
- **THC** means Delta-9-tetrahydro-cannabinol, the primary psychoactive ingredient in cannabis.
- **Industrial hemp** is cannabis that contains 0.3% THC or less in the flowering heads and leaves.
- **Cannabis** refers to the plant *Cannabis sativa*.

Guidelines

Since legalization, Canadian veterinary regulators have been supportive of Veterinarians having informed discussions with clients about the potential use and toxicity of cannabis products in animals. In the interest of fulfilling the statutory mandate of protecting health, safety and welfare of the public and its companion animals through the regulation of the practice of veterinary medicine, the _____ (NAME OF CANADIAN REGULATOR) has issued the following guidelines for the use of cannabis products in the practice of veterinary medicine. ***Licensees must at all times adhere to the applicable standards of practice in their Jurisdiction.***

- (1) Veterinarians may advise and caution clients on the use of legally available recreational cannabis products for their pets.
- (2) Veterinarians who choose to provide advice should seek up-to-date information on cannabis use in animals through, for example, the scientific literature or continuing education.
- (3) Veterinarians understand that legally available recreational cannabis products will not be labelled with animal safety in mind.
- (4) It is important that Veterinarians recognize that legally available cannabis products are not indicated for animal use; they are not classified as drugs (and so cannot be prescribed) and no health claims are made. The scientific evidence with respect to safety and efficacy of the use of cannabis products is growing but remains limited.
- (5) Veterinarians are accountable for any professional advice they provide to a client about their animal.
- (6) Due to third party distribution of products in the recreational market, Veterinarians should be vigilant in making recommendations and confirm the product obtained is appropriate for use.
- (7) Veterinarians are not obligated to advise on the use of cannabis products if they do not believe it is clinically appropriate.
- (8) If a Veterinarian chooses to advise on the use of a legal recreational cannabis product in an animal they:
 - (a) Must practice within the scope of their clinical competency;
 - (b) Must weigh the evidence against other available treatment options;
 - (c) Must consider the known or suspected risks associated with its use in animals;
 - (d) Must obtain client consent;
 - (e) Must monitor patients and be available in the event of an adverse

reaction or failure of treatment; and

- (f) Must be aware of the potential for abuse, diversion and misuse of cannabis.
- (9) Veterinarians may recommend and/or sell Veterinary Health Products with hemp that are approved by Health Canada.

References

- (1) The Cannabis Act: The Facts. From Health Canada. Government of Canada.
<https://www.canada.ca/en/health-canada/news/2018/06/backgrounder-the-cannabis-act-the-facts.html>