

## **Additional written evidence submitted by Volteface (DRU0073)**

### **Additional evidence submission to HASC on medical cannabis access**

**Original evidence submission can be accessed here: [\(DRU0073\)](#)**

#### **Volteface:**

Volteface is a drug policy think tank, researching and advocating for evidence based, harm reduction focused drug policy reform. We work with an array of partners across civil society, academia, industry, the media, and politicians from across the political spectrum to foster public engagement and formulate new policy ideas. We are UK-based and focused, whilst engaging with ideas, discussions and practices from across the world.

#### **Barriers to patients accessing the current UK medical cannabis system:**

1. Latest figures estimate there are approximately 17,000 legally prescribed medical cannabis patients<sup>1</sup> in the UK. However, approximately 1.4 million people<sup>2</sup> are self-medicating cannabis illegally to treat a medically-diagnosed chronic health condition. The discrepancy between the number of legal and illegal patients sheds light on a problem with the current framework, showcasing several barriers around patient access.
2. Medical cannabis has been legal under prescription in the UK since November 2018.<sup>3</sup> Nevertheless, access has been limited by the lack of awareness amongst the general public that it is in fact legal. A recent survey found that 84% of the British public<sup>4</sup> are unaware that medical cannabis is available on prescription from specialist clinics in the UK. This lack of awareness is a contributing factor to many people still accessing the illicit cannabis market, without the knowledge that there is a legal route via medical prescription.
3. Strict MHRA regulations around the advertising<sup>5</sup> of medical cannabis as an unlicensed specialist medicine makes it difficult to raise awareness of its legality. Despite legal advertising regulations being strict, illegal marketing has recently increased. In the last few months, an illicit cannabis delivery start-up *Dispenseroo*<sup>6</sup> has been able to attract thousands of customers with an illegal guerilla advertising campaign on the London Underground. The fact that legal medical cannabis operators are unable to advertise

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<sup>1</sup> [Medical cannabis has now been prescribed to 17,000 in the UK - but many are still using the black market | METRO](#)

<sup>2</sup> [Around 1.4m people in Britain using 'street cannabis' to treat chronic health conditions, poll finds | Independent](#)

<sup>3</sup> [Government announces that medicinal cannabis is legal | GOV.UK](#)

<sup>4</sup> [84% of Brits unaware cannabis flower is available on prescription | Leafie](#)

<sup>5</sup> [The Blue Guide: Advertising and Promotion of Medicines in the UK | Medicines and Healthcare products Regulatory Agency](#)

<sup>6</sup> [Illegal weed delivery start-up Dispenseroo sees meteoric growth in the UK | Independent](#)

their services due to guidelines, many cannabis users are continuing to access the illicit market with no knowledge of a legal pathway.

4. Cost of cannabis based medicinal products are a significant barrier to current and qualifying patients, given access is currently only feasibly accessed and prescribed privately. This makes it difficult for the legal route to compete with the illicit market due to the additional fees associated with a legal prescription, including consultation fees. The starting cost of a medical cannabis prescription per month is around £250 starting at £5 per gram<sup>7</sup>, which is the lowest possible price, only available through special access schemes, such as the Project Twenty21 Scheme<sup>8</sup> or the Sapphire Clinic's Access Programme.<sup>9</sup> However, patients only receive these reductions at the clinics discretion and pricing can suddenly change. Additional consultation fees vary anywhere from £70 to £285 per prescription - though this does vary based on the clinic.<sup>10</sup> There are crowd-funded resources that provide details of prices of different products, offered by different clinics.<sup>11</sup>
5. Informal sources such as online forums specifically discussing illegal cannabis market in London<sup>12</sup> suggest the price of cannabis on the illicit market in the UK ranges between £5-10 per gram. Though at first glance the street cost of cannabis is similar or even slightly more expensive, the total cost of legal medical cannabis is still significantly higher once the clinics appointment charges, prescription and consultation fees are added. Current framework of scheduling means that patients' prescriptions need to be reviewed on a monthly basis, leading to exceptionally high costs, making it difficult to compete with the illicit market. Additionally, costs for medical cannabis prescriptions have been going up as a result of the cost of living crisis,<sup>13</sup> which could be resulting in patients returning to the illicit market.
6. The UK is the world's largest exporter of medical cannabis.<sup>14</sup> However, the cannabis that is supplied to UK patients is imported, mostly from Denmark, Portugal, Canada or Australia.<sup>15</sup> There are a growing number of European countries that are beginning to export and build an internal infrastructure to supply medical markets. The UK is currently reliant on strict importation and pharmaceutical regulations, which makes it difficult to supply patients with medical cannabis that they need. The strict regulations which go through the Home Office are making supply times delayed for patients to receive their medicine on time. These delays and the long process for importation may also have a

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<sup>7</sup> [How Much Does Medical Cannabis Treatment Cost? | PLEA](#)

<sup>8</sup> [Access Medical Cannabis with Project Twenty21 | Drug Science](#)

<sup>9</sup> [Sapphire Access Scheme: The UK's First Medical Cannabis Registry | Sapphire Clinic](#)

<sup>10</sup> [Medical Cannabis Clinic Directory | PLEA](#)

<sup>11</sup> [MedBud UK](#)

<sup>12</sup> [r/uktrees: Regional Pricing | Reddit](#)

<sup>13</sup> [What does the cost of living crisis mean for the medical cannabis industry? | Volteface](#)

<sup>14</sup> [Is the UK the world's biggest exporter of legal cannabis? | BBC News](#)

<sup>15</sup> [Export-led growth for the UK medical cannabis industry | Decalogue](#)

detrimental impact on the medicine, worsening the quality of product.<sup>16</sup> The current system is leaving patients with gaps in care and without medicine for days to weeks because of delays in the process of importation and distribution. Revising these factors would help make the medical market more effective, and competitive with the illicit market, given drug dealers do not follow such rigorous regulations.

7. Medical cannabis sits within the list of drugs controlled under the Misuse of Drugs Act<sup>17</sup> sitting within the Home Office's remit. Due to this classification, the cost of medical cannabis goes up as a result of having to import small amounts of product at one time, treated in the same category as firearms. In order to move users from the illicit market to the legal medical one, costs need to be driven down.

#### **Recommendations for the Home Office to overcome barriers to access:**

8. Given these barriers, people that are chronically ill and using medical cannabis to manage their symptoms illegally are being criminalised. As there is a legal pathway to access the medicine, there should be greater support and incentives for patients to switch from the illicit market to the legal one. The Home Office should have an interest in making recommendations and changes to the accessibility of medical cannabis in the UK in order to save police time, reduce the amount of money made by organised criminal gangs and reduce the criminalisation of vulnerable populations that are self-medicating using cannabis. Volteface has several recommendations around what the Home Office could do to make point of entry to the legal market for qualifying patients in the UK easier, moving them off the illicit market.
9. **Police referral system for illicit patients:** Police that catch people with illicit cannabis who would qualify for a prescription<sup>18</sup> should have a referral pathway where they can divert to an educational platform containing information on how to access a legal medical cannabis prescription. This portal should be factual, containing all the relevant information patients need to know to start the process to be legally prescribed. This system of signposting would help move current cannabis users that are self-medicating on the illicit market, to a legal and medically supervised route, reducing harm and criminalisation.
10. **Central website and information portal containing information about medical cannabis access:** The Home Office should fund the creation of a central portal containing relevant and factual information on the medical cannabis system in the UK, in order to provide a resource to patients on the current system to help them make an informed decision. This central information hub would help raise awareness about the legality and provide an unbiased, factual resource for qualifying patients.

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<sup>16</sup> [UK prescription cannabis that 'may be contaminated with mould' | Health Europa](#)

<sup>17</sup> [Controlled Drugs List | GOV.UK](#)

<sup>18</sup> [How to get a medical cannabis prescription in the UK | Leafie](#)

11. **Updating current content to signpost for patients:** Online resource portals like Talk to Frank<sup>19</sup> should contain information about medical cannabis to direct qualifying patients to helpful resources, recognise the legality and legitimacy of the medical cannabis sector in the UK. This content could be created by the Home Office with consultation from expert groups. For examples of content that currently exists, patient groups like Patient Led Engagement for Access (PLEA)<sup>20</sup> have created a bank of resources for patients to be sufficiently supported.
  
12. **Government led awareness campaign about the legality of medical cannabis:** In order to most effectively increase awareness around the legality of medical cannabis, to divert as many patients away from the illicit market, the Home Office should consider funding a government led campaign to highlight how the medicine can be accessed legally, reducing the number of vulnerable people criminalised and reducing money made by organised criminal gangs.
  
13. **Government helping to create a sustainable market:** Currently the regulatory environment for medical cannabis makes it very difficult for the medical market to compete with the illicit market from a cost, quality and delivery perspective. Though these issues are uncommon with other medicines, cannabis is unique in being available for decades illegally and only several years legally. Due to the uniqueness of many people using cannabis for medical reasons, albeit illegally, the regulatory environment must recognise it is unlike any other scheduled medicine. The Home Office should focus its efforts on doing all it can to eliminate the illicit cannabis market, through making the regulatory environment for medical cannabis more sustainable and affordable, which in turn will increase patient access.

**January 2023**

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<sup>19</sup> [Talk to Frank](#)

<sup>20</sup> [Patient Led Engagement for Access](#)