



April 11, 2016

Dr. Margaret Chan
Director-General of WHO
20, Avenue Appia
CH-1211 Geneva 27
Switzerland

Copy to:

Secretary Gilles Forte
Expert Committee on Drug Dependence
World Health Organization
20, Avenue Appia
CH-1211 Geneva 27
Switzerland

Dear Dr. Chan,

I would like to refer to the role played by the World Health Organization (WHO), and in particular its Expert Committee on Drug Dependence (ECDD), in the medical, scientific and public health evaluation of psychoactive substances under the international drug control treaties and to draw your attention to the urgent need for a critical review of cannabis by this Committee.

As you know, cannabis is included in Schedules I and IV of the 1961 Single Convention on Narcotic Drugs. The drugs in Schedule IV are those considered as having particularly dangerous properties and lacking therapeutic value. However, cannabis is now used for medical purposes by more than two million patients in several countries. Unfortunately, in many other countries, the use of cannabis for medical and scientific purposes is prevented due to its present obsolete scheduling status under the 1961 Convention.



In 2009, the Commission on Narcotic Drugs (CND) in its Resolution 52/5 asked for an updated report on cannabis by the ECDD. In 2013, the International Narcotics Control Board, in its annual report, invited the WHO, in view of its mandate under the 1961 Convention, to evaluate the potential medical utility of cannabis as well as its possible dangers to human health. Despite these requests, the ECDD has of yet not been able to conduct the critical review of cannabis and to make any recommendation to the CND regarding its scheduling status. When the ECDD met in Geneva on November 16-20, 2015, it only agreed on a request to the secretariat to start collecting information for a pre-review of cannabis, cannabis resin and extracts and tinctures of cannabis at a future meeting.

We have learned from the ECDD’s website that the only paper on cannabis presented to the Committee in November 2015 was a paper by one of its members, Dr. Bertha Madras. The paper appeared on the website only several weeks after the meeting, with the disclaimer: “The author alone is responsible for the views expressed in this publication and they do not necessarily represent the decisions or policies of the World Health Organization.”

We strongly feel that the paper by Dr. Bertha Madras left out many items of information that are very important for the evaluation of cannabis by the ECDD. For this reason, we have taken it upon ourselves to create the *Cannabis and Cannabis Resin Critical Review Preparation Document*, which is structured according to the mandatory structure of the WHO critical review documents as stipulated in the “Guidance on the WHO review of psychoactive substances for international control.” We are pleased to provide you with a copy of this document under cover of this letter and hope that it will facilitate the critical review of cannabis by the ECDD as soon as possible.

Our document thoroughly examines the vast research on the therapeutic value of cannabis, accurate accounts of toxicology and related public health concerns, a summary of the variety of ways cannabis is controlled nationally and internationally, and the policies that are needed to make safe and legal access to medical cannabis available to all patients who would benefit from it. This document



was written using over 300 references and has been reviewed by dozens of experts and stakeholders of medical cannabis.

It is our hope that this document can help guide the ECDD's critical review of cannabis so that the WHO can communicate to the CND, as soon as possible, a recommendation regarding the future control status of cannabis. We trust that the ECDD will be able to recommend to the CND, as a minimum, to exclude cannabis from Schedule IV of the 1961 Convention. We also hope that this document will help the United Nations General Assembly Special Session (UNGASS) on drugs in April, 2016 to create a roadmap for addressing cannabis policies.

We are at the disposal of the secretariat of WHO for any clarifications that could facilitate the use of this document by the ECDD.

I thank you, Madam, for your attention to this matter and to the needs of patients around the world who would benefit from the medical use of cannabis.

Sincerely,

Steph Sherer

Co-chair, International Medical Cannabis Patient Coalition
Executive Director, Americans for Safe Access