ACMD

Advisory Council on the Misuse of Drugs

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Dear NICE Centre for Guidelines,

RE: NICE consultation on cannabis-based medicinal products

Thank you for your e-mail of 13 November 2018 which offered the opportunity to comment on the draft scope for the NICE guideline on cannabis-based medicinal products (CBMPs).[1]

As referred to in Section 1 of the draft, the Advisory Council on the Misuse of Drugs (ACMD) recently published advice on CBMPs.[2] The ACMD expect to receive a further ministerial commission shortly, setting out the scope of the ACMD's longer term review of CBMPs. We would like to offer comments on some of the gaps and challenges which seem relevant to the development of the NICE guideline.

Section 3.3

Lines 8-11: It may be helpful for NICE to provide specific advice on other conditions where there is expected to be patient demand.

Line 22: The draft scope excludes nabiximols, synthetic and non-natural cannabinoids but further clarity is needed on whether they will be considered for the conditions within scope.

[1] https://www.nice.org.uk/guidance/gid-ng10124/documents/draft-scope

[2] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739636/Consultation_on_Cannabis-derived_medicinal_products.pdf

Section 3.5

Paragraph 2: There is a need for more information on the range of products available to be prescribed by clinicians. There is a lack of published data on such products, particularly on the characterisation, bioavailability, pharmacokinetics and pharmacodynamics of products, how they are to be used and the impact of the route of administration, including the effect of heat on producing the major active agents from their acid forms. Unless the clinician knows the dose, the route of administration and the suggested dosing frequency then it is difficult to see how CBMPs could be used effectively.

Paragraph 2.2: there needs to be clarity on what support prescribers can expect to receive to aid decision making on specific products and which frameworks prescribers can follow.

Paragraph 3.2: the current structure for quality assurance mechanisms around the variability of products needs to be refined.

We hope these comments are helpful and we would appreciate further opportunities to engage with NICE over the duration of the review.

Yours sincerely,

Dr Owen Bowden-Jones
Chair of the ACMD