



Friday, 20 September 2019

Mr. Pedro Eastmond,
Clerk of Parliament,
Parliament Buildings,
Bridgetown.

Dear Mr. Eastmond,

Re: Joint Select Committee on the Medicinal Cannabis Industry Bill 2019

Thank you for your kind invitation to the Barbados District of the Pentecostal Assemblies of the West Indies (PAWI) to offer this written submission to the Committee through your good offices.

As you are no doubt aware, PAWI is not opposed to the introduction of medicinal cannabis in Barbados. However, earlier this year we placed our questions and concerns in a full page add in local print media. Those questions are still relevant to us and are largely unanswered. A copy of the page printed in one of our newspapers is attached for your convenience.

PAWI notes, with appreciation, that “dispensary” has been removed from the current draft of the Bill. We were concerned that the inclusion of “dispensaries” in the Bill would have the effect of opening a loophole for the development of a new entity other than pharmacies for the filling of prescriptions. Thank you.

However, we note the introduction of a “therapeutic facility” which is defined in the Bill but not explained as to how such a facility would operate. Perhaps that will be structured under regulations to be issued subsequently by the Minister of Agriculture after the passage of the Bill through both Houses of Parliament.

We are not sure why cannabis can be “prescribed” or “recommended” by a physician. This to our minds seems to create a loophole that can be exploited by those less scrupulous than desired. Perhaps this could be clarified fully in the Bill when it returns to the House of Assembly for the second and third readings.

Barbados District, Pentecostal Assemblies of the West Indies,

P. O. Box 8002, Oistins, Christ Church, Barbados. Tel: 1-246-420-7721; Fax: 420-7720; Email: pawi@caribsurf.com

Registered Charity #4. Member: Barbados Evangelical Association

PAWI notes that there are three pages in the Bill outlining the need for regulations in addition to other clauses within the Bill that call for regulations to be put in place by the Minister of Agriculture. We are concerned that such regulations will be "subject to negative resolution", which we understand means that the regulations are laid on the table of the Clerk of Parliament in the House of Assembly and if no one objects within a specified period of time those regulations automatically become law. Given that there is currently only one person sitting on the Opposition Benches in the House of Assembly we would suggest that Government needs to ventilate as fully and transparently as possible all regulations before their provisions come into force. As the old saying goes, "the devil is in the details" and we are concerned that in this case this may be literally true! The potential for the creation of loopholes, contradictions and controversy is too great not to fully discuss the proposed regulations as widely as possible.

We note that under the First Schedule, Appointment of members, 1.(1) that the "Board shall comprise 7 members" and section (2) then sets out the disciplines from which Board members can be selected. We respectfully recommend that there be 8 members and the Permanent Secretary in the Ministry of Health or his/her nominee be included. While the Bill sets out provisions for the cultivation of medicinal cannabis and so can be located in the Ministry of Agriculture, it would seem prudent to have strong representation from the Ministry of Health on the Barbados Medicinal Cannabis Licensing Board.

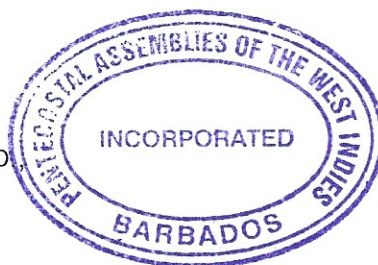
Many of the members within PAWI are deeply concerned that this process of legislating for the development of medicinal cannabis is simply a way in which the recreational use of marijuana can be slipped into Barbadian society. Protestations from Government to the contrary have made little or no difference to this belief. We are also concerned that many Barbadians seem to believe that once this Bill is passed into law they will be free to use cannabis/marijuana recreationally as they please. In PAWI we are profoundly disturbed by this.

Thank you for affording PAWI this opportunity to voice our concerns to this Joint Select Committee.

Yours Sincerely,



Gerald A. Seale, B.Th., M.M.S., D.D.
District Presiding Bishop



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STATEMENT ON MARIJUANA

INTRODUCTION

1. The Pentecostal Assemblies of the West Indies Barbados Inc (PAWI Barbados) is a spiritually, morally and theologically based non-governmental organisation registered as Charity #4 under the Charities Act, Cap. 243 of the Laws of Barbados. As such PAWI Barbados will not attempt to outline a scientific basis for this statement. Indeed, the available documentary evidence indicates that for every compelling scientific paper supporting the use of marijuana there seems to be a compelling scientific paper opposed to the use of the substance. We will leave the discussion of these realities to those much more qualified than PAWI Barbados in the scientific realities and theories.

2. The Christian values we espouse include sobriety, self-control and sound mind.

3. It is such values that have led us to actively discourage the use by our members of other plant derivatives such as tobacco and alcohol. That has been our unequivocal public stance since our inception here in Barbados in 1916.

MEDICAL USE

4. PAWI Barbados is willing to acknowledge that marijuana could have some benefits if used in a medicinal form but we leave the discussion of the scientific pros and cons to the medical and scientific communities. We recognise there are other dangerous substances that are prescribed by doctors in controlled circumstances and dispensed by pharmacists in Barbados.

5. We note that other medicinal products are subjected to rigorous testing over decades where side effects are clearly documented before the medicine is made available for medical prescription and use. We are unaware of such rigorous testing being done on medical marijuana.

6. We are concerned that the push for medicinal marijuana use is simply a back-door approach to the legalisation for recreational use.

7. WE MUST THEREFORE ASK:

7.1. How will the medical marijuana be accessed by pharmacies and doctors for prescription to patients?

7.2. Who will grow the marijuana and distil the appropriate derivatives for the medical fraternity to use?

7.3. What standards will be applied to the quality of derivatives for medical use?

7.4. Will there be clear guidelines for prescribing medical marijuana for the use of patients or will doctors be left to experiment?

7.5. How will side-effects be dealt with as they are noted by the medical community?

7.6. Will the rigorous scientific testing applied to other medicines be applied to marijuana derivatives before the medical community is allowed to prescribe the substances for patients?

8. We note with concern that when tobacco was first discovered in America by European explorers it was thought to have medicinal value and was prescribed as a cure for a number of ailments including stuttering. Centuries later we know there is no truth to such claims and tobacco products are routinely labelled with health warnings.

MARIJUANA LEGALISED FOR RECREATIONAL USE

9. Given that for more than a century PAWI Barbados has

actively encouraged members not to use tobacco and alcohol (see paragraph 3 above), it would now be inconsistent for us to support the legalisation of marijuana for recreational use.

10. AS WE HAVE DISCUSSED AND REFLECTED SOME QUESTIONS SUGGEST THEMSELVES SHOULD RECREATIONAL USE BE LEGALISED:

10.1. How will the legal framework address who grows/imports marijuana?

10.2. Given that differences in marijuana plants lead to differing strengths of derivatives how will this be controlled so that persons electing to use marijuana recreationally can obtain a consistent product or will this be a free-for-all?

10.3. How will sale to minors be addressed, particularly in light of those studies that suggest adolescents and pre-adolescents are more susceptible to negative psychological and medical consequences from using marijuana?

10.4. Given the lengthy process that we have had in moving towards the actual testing of drunk drivers locally, how will we deal with those who use marijuana resulting in impaired driving?

10.5. Given that some studies have shown that some people are affected negatively by the use of marijuana, how will we handle psychological and medical health problems that may arise for some of our people? Can the numbers and percentages of persons who have been treated or are being treated at the Psychiatric Hospital for marijuana related health issues be made public?

10.6. Do we have the resources to socially and psychologically assist the families of those who are negatively impacted by on-going marijuana use?

10.7. Will there be areas where its use will be restricted as with tobacco, given that many people suffer from bronchial and other challenges as a result of second-hand smoke?

RECOMMENDATIONS

11. While we might support the medical use of marijuana, we strongly recommend that marijuana be treated like all other prescription medication and be subjected to the same rigorous testing and controls applied to all prescription medicines. Is it possible that an independent scientific study be done and the findings be widely disseminated for discussion of the issues?

12. We urge that the medicinal use of marijuana not facilitate a back-door approach to the legalisation of marijuana for recreational use.

13. ***We are opposed to the legalisation of marijuana for recreational use and strongly urge that Barbados not go down this road.***

