Edibles

Edibles – These are generally defined as anything ingested via the digestive tract. Currently accepted methods of delivery already include suspensions and oral sprays. Some patients respond better to edible or ingestible forms of cannabis. Provided that an edible product can be produced in a manner consistent with good manufacturing and dosage formulation there is no reason that the MDH shouldn’t allow additional forms of ingestible cannabis be added.

The MDH has already approved certain types of edibles the inclusion of other forms of edible forms of Cannabis medications is consistent with already approved methods.

Topical applications

Topicals – These are generally defined as anything applied to the external skin of a patient. There is mounting evidence that application of cannabis in topical formulations helps patients who desire or need longer term absorption of the various cannabinoids. It is generally reported there is no “high” from applying a topical which makes scientific sense as it is considered to be the slowest method to administer medications. Currently MDH allows fast acting methods of administration of Cannabis, this method would allow some patients to benefit from a slower method of administration and should be included as an approved method of administration.
**Whole plant, vaporizable**

I am writing to support the use of the cannabis plant in its raw form as an approved delivery method in the treatment against the approved medical conditions according to the state of Minnesota. The delivery methods currently available make the current price tag of the medicine out of reach for many patients. Allowing patients to use raw cannabis plant as medicine will allow those who do not have unlimited financial access the ability to treat their conditions without fear of fiscal disaster. Furthermore, the cannabis plant has proven safe for the thousands of years that human beings have been using it. To deny patients access to a treatment simply because they cannot afford it is morally reprehensible. I strongly support the approval of raw cannabis flower as a delivery method in Minnesota.

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Allowing use of the whole plant Cannabis:

- Will allow patients to tailor the medicine to their specific needs
- Will eliminate the need for lab processing of plants into oil and that will directly save the patient money
- Will make it easier to titrate the medicine
- Will allow patients to change the medicine as needed and stop patients from becoming over tolerant of their medicine and associated need to increase dosage and frequency of dosage.

Support of Whole Plant Cannabis Usage

There are many reasons for which myself and many others would like to see the whole plant Cannabis allowed. The main reason I do is my significant other’s condition requires very specific medical cannabis that can not be obtained under current regulations. Whole plant use allows patients to tailor their medicine to their specific condition. There are more medicinal properties to the whole plant form than just THC and CBD. Many terpenes and flavonoids are components with significant loss in processing into oil, as well as CBN, another cannabinoid with unique properties. We have treated my girlfriend with cannabis plant material successfully before, and attempted to do the same with medicinal oils about 6 months ago. She acquired these oils in another state and thought it’d be easier than breaking down whole plant cannabis to make food with. While the medicine we made from that oil acted similar to what we made with plant material, it did not provide the needed THC-V, a component that is responsible for stimulating the Cannabinoid receptors in the pancreas, and she ended up having to use insulin at almost the same level at which she used before cannabis treatment. Today, through use of the whole plant in edible mixtures, namely specific strains of the plant that are high in THC-V, we have essentially eliminated her insulin dependence, causing a wide range of health benefits for her and increasing her quality of life.
I'm petitioning to expand Minnesota’s Medical Cannabis Program to add legal whole plant access to raw Cannabis Indica, Sativa and Hybrid strains.

I was certified into Minnesota’s Medical Cannabis Program under 3 qualifying medical conditions, “Persistent & Severe Muscle Spasms”, ”Crohn’s Disease” and “Intractable Pain”. I also suffer from the medical conditions Pancreatitis, Cervical Spondyliitis, Sacroiliitis and Osteo Arthritis.

The Medical Cannabis products available from MinnMed& Leafline are not medically effective in treating my life threatening medical conditions, because the medical cannabis products lack potency and access to a full spectrum of cannabinoids that are purposely removed by both manufacturers to fit the business models they’ve created for themselves. I have also suffered painful side effects, been personally injured and I cannot keep myself alive with the medical cannabis products available. I could receive every medical cannabis product created by both MinnMed & Leafline for free and still would not be able to keep myself alive on an hourly basis. Both manufacturers know of the dire medical need for medical cannabis products created within the spectrum of Cannabis Indica, but MinnMed & Leafline refuse to recognize Cannabis strains that exist in nature and are available in the vast majority of Medical Cannabis States, like Cannabis Indica, Cannabis Sativa and Cannabis Hybrids.

I'm an experienced medical cannabis user and I'm aware that only cannabis strains within the cannabinoid spectrum of a Cannabis Indica will successfully treat my complex medical conditions, keep my symptoms dormant, and allowed me to stay alive for the last 6 years.

As a patient in Minnesota, until either manufacturer decides to recognize specific cannabis strains or a medical cannabis product that fits the cannabinoid spectrum needed for my life threatening medical conditions. I’m left with no other choice, but to continue to illegally treat myself to stay alive by using a strain of raw whole plant Cannabis Indica and continue to petition Minnesota’s Department of Health.

Enclosed are published scientific studies regarding the effects of raw whole plant cannabis strains on Inflammatory Bowel Disease including Crohn's disease and Colitis.

Cannabis Induces a Clinical Response in Patients with Crohn’s Disease
http://www.cghjournal.org/article/S1542-3565%2813%2900604-6/pdf

Cannabis Finds Its Way Into Treatment of Crohn’s Disease
http://www.karger.com/Article/Pdf/356512

Treatment of Crohn’s Disease with Cannabis

Cannabis Use Amongst Patients with Inflammatory Bowel Disease

Differential Expression of Cannabinoid Receptors in the Human Colon: Cannabinoids Promote Epithelial Wound Healing.

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The cost for chronically ill patients to enter and buy medical cannabis is too high, unaffordable in many cases. From the price to register with the state ($200 for individuals who do not receive assistance) to the price to get certified by a Dr, to the cost of the medicine. It is a system destined to fail unless it becomes more affordable and adds variability to the current products provided.

The MN companies supplying MMJ have commented that a monthly price falls mostly between $300-$1000. This means a person would pay, at minimum, $3600/year for Mn MMJ (and potential to go up to $12,000, or more, if one uses the Manufacturers quoted numbers). Obviously in other legalized states the price falls well below that, but the Mn manufacturers rationalize that we have a quality consistent product thats far superior to any other state product. But if one visits Colorado or another MMJ state, there are quality manufacturers who have a quality tested, repeatably produced product (oils for example) that sells well below our own Mn product. Obviously in other states there is competition with manufacturers, where in Mn there is none. And other states it is often easier to get certified, where in Mn it can be next to impossible or it has a high cost (some pain clinics, which is the only option to get certified by many of the patients, are somewhere from $250- $400 (minimum) just to certify annually). Prices need to come down across the board to make this program affordable to the chronically ill. And one of the biggest ways to do that would be to allow plants to be grown at home and flowers/buds to be sold at the dispensaries.

Our state has a serious lack of variety of types of cannabis. My disease (and related diseases), based on various MMJ chatgroups in other legal states, gets better relief with Indica. Neither Mn manufacturers have a product that is from (or primarily) Indica. Why would I use a current product made by the manufacturers which is not what similarly experienced patients indicate is better for my disease. Thats like going to the Dr and they tell you how you feel vs you telling them. Allowing plants and flowers/bud to be sold in its MMJ program would allow a larger range of cannabis types (Sativa, Indica, Hybrid) plus strains with various % of CBD, THC, CBN, THCV, terpenes, etc. The program would be accessible, affordable and more suitable to various chronic conditions.

Contrary to what many people think, I’m not out to get high, I actually do have pain (and not “pain” as some people are apt to say when they are actually using opinion instead of fact/science to diagnose our medical issues as they don’t want to se MMJ at all in our state. Interestingly, these same people ignore the aspect that we already have highly addicting drugs from our Drs who prescribe due to our pain and other issues). I want something that works to take away my pain and spasms that doesn’t consist of addicting pharmaceutical drugs. If I wanted to get high I’d stick to my opiates and benzos and black box pharmaceutical drugs, all of which I can easily get from my Drs. Despite receiving highly addicting drugs from my Dr, there is not one prescribed drug that can get rid of the muscle
spasms and pain for me, but on the other hand cannabis can reduce or totally eliminate my spasms and pain.

With continued high prices, the lack of cannabis type/strains and the lack of being able to grow at home, the state is basically forcing people to go to the black market. Priceofweed.com shows an ounce of Mn street weed to be approx $335 (Sept 6 prices) and other states have even a lower price. The state can’t keep up with prices such as those and that lures people away from the Mn program.

But if the state allowed plants to be grown at home (I’d love to have fresh leaves for juicing!! And that doesn’t get you high since it’s the THC is still in the acid form), or flowers/bud, then the program would be affordable and viable to the chronically ill in Minnesota who qualify for the Mn cannabis program. Need I even mention that it would also have the benefit to reduce opiate usage by a group of Minnesotans.

I am a current registered patient, I think Vaporizing the cannabis flower is a great idea! That would be a huge step for patients to be able to use specific strains of marijuana and get all the benefits of that particular strain for a more specific treatment of patient symptoms. Vaporizing cannabis flowers would keep the cost much lower for patients and the dispensaries would make much more money simply by having different products available to patients, attracting more interest in the cannabis program. For example “charlottes web” is a strain of marijuana with very high concentrated CBD and lower THC LEVELS, it also has different plant terpenes and also has different effects on a person than other strains so if a patient is going to get CBD based medication at the dispensary it is always good to know what strain u are getting, and how your body reacts to different strains. It's kind of like having a headache and asking yourself do you need to take a couple Tylenol or do you need Excederine? Or if you are having muscle spasms and choose between Naproxin, ibuprofen, or Flexoril. This is especially important for children who are taking cannabis so parents/caregivers would know what their child is getting and which product would be better for day or night time as well as getting all the benefits from their medication. Edibles are very important because many people have a hard time swallowing pills and many parents/caregivers struggle to get a sick child to swallow a pill or puff on a vaporizer. I know my kids used to run screaming when I pulled out the cough medicine but if I pulled the pink bottle of penicillin from the refrigerator when they had to take antibiotics the bubble gum flavor made it much easier to get cooperation from them, many parents have had to mix medications in food or juice to get kids to take their meds. I personally am a registered patient and suffer from muscle spasms. I have a facebook site called MN Marijuana Doctors with over 800 members in the group. I’m also a bail bondsman, I've never been in trouble and no one even knows that I have medical cannabis, the last thing on
my mind is getting into trouble but the idea that I could buy cannabis on the
street for cheaper and make my own edibles is a very real and unfortunate way
of thinking... The only thing stopping me is that I wouldn't know what strain I'm
getting or if it was grown properly and obviously I don't want to get arrested. I
wonder if the underlying issue is more likely that law enforcement and other
officials are put off by the thought of seeing regular marijuana on "the streets"
(by the streets i mean in mom's purse or in Dad's vehicle) and just not liking the
idea of having to let them keep it in their possession? It's actually a very silly
way of thinking simply because having the actual marijuana plant material is not
going to make anyone become an addict or make them want to commit crimes.
And all the other patients I have talked to are most defiantly NOT trying to carry
around marijuana to be a cool person with legal weed, they are just trying to
feel better. Most of these people have never been in trouble with the law
before so more than likely local officials would rarely come in contact with a
patient under any normal circumstances allowing officers to continue their jobs
as usual.
Another important thing for anyone who has concerns with edible cannabis or
cannabis flowers should remember that most people don't need a baby sitter,
and we can't all sit around saying "what if...?"

Use of the Plant – It is becoming clearer to researchers that the use of the plant
in its raw form offers an extraction that is not achievable via any other method.
Many patients could benefit from this method of delivery. Current methods of
delivery require that the plant be processed in a way that strips many of the
components of the plant from the medication produced. There is mounting
evidence that there are many unknown compounds and interactions between the
known compounds that produce far more favorable treatment outcomes.

Vaporization of the Cannabis Flower – Currently the MDH allows the use of
Electronic Vaporizers as a method of deliver. Vaporization of the plant itself is
extremely similar to the method already approved. Vaporization of the cannabis
plant will be beneficial to patients that are unable to use the current methods of
administration. Patients who have digestive issues will be able to use this
method to safely administer their medication. Vaporization of the plant also
offers a method of administration that allows for complete use of the
cannabinoids and other compounds that are found in the plant itself that are not
contained in currently approved methods of deliver. Vaporization also offers a
quicker administration of the medication. Vaporization allows the fastest method
of administering Cannabis medications. Many patients with conditions that
change such as those already approved and those being considered will benefit
from this method of administration. Sudden onset of symptoms will be treatable
with quicker administration methods like vaporization. The MDH should add this
method of administering Cannabis medications.

The MDH has already approved vaporization of some parts of the Cannabis
plant. It was not the intent of the law to not include complete use of the plant.
Use of the Plant and Vaporization of the plant will reduce costs and increase
effectiveness of Cannabis medications. The costs associated with production
would decrease, thus the cost of medication would be reduced. There are parts of the plant that are not included in current preparations that would be included in the use of the plant. These excluded substances are safe and effective in the treatment of medical conditions.

Just writing to confirm my feelings that vaporizing is more the safe a plant material is easersaer and allows a much easier way to use cannibus.Not to mention allowing use of different stains is nessecary to reset the bodies tolerance systems.
Please allow these changes,other states allow this. Also this a medical issue not a law enforcement concerns or frankly any of their business
Just to confirm, please allow vaporizer use of plant and whole plant access. Nature didnt get it wrong. I cannot use the program, it is simply way to expensive. Im on S S and these changes would benifit hundreds, if not thousands. To many people have worked to hard for this program to fail. And also not all things are about profit. Remember the hipocratic oath ,First do no harm.

I can get oil vape for my prescryption. I wish I could Vape plant material.

General Comments

In support of adding additional delivery methods!

I am writing to express my support for expanding the delivery methods allowed in the MN medical cannabis program. I believe that the current methods are too restrictive, and if full plant use, edibles, and plant vaporization were allowed, they would be able to serve many more patients. It would also help lower costs to patients, which is a vital issue as MN’s program is notoriously expensive. (Unprocessed plant matter is inherently cheaper to produce and distribute than concentrates, I believe.)

From my internet research and in talking to friends who are patients in other states (where medical cannabis laws are more comprehensive) I believe that MN’s own program needs to be expanded in order to help more people. It seems that the cultural taboos against cannabis as a helpful product are finally starting to change, and that is a great development, because it can provide relief
for many people, with little if any negative side effects.

The MDH should include all of the conditions being considered to be added to the Medical Cannabis program.

The MDH should include all of the new methods of delivery being considered to being added to the Medical Cannabis program.

1). The conditions being considered are difficult to treat with current medications and many patients respond favorably to treatment with Cannabis.

2). The conditions being considered often result in the use of highly toxic or addictive medications.

3). Cannabis has been used for the treatment of many medical conditions since before recorded history.

4). Cannabis has been used by millions of US citizens and billions of people worldwide, annually, without significant adverse affects to the users.

5). Cannabis is recognized as being a Safe and Effective medication in the treatment of medical conditions.

6). Cannabis can be used in a variety of forms, formulations, and methods of delivery that are safe and effective.

7). Cannabis as a whole plant offers more medical benefit than processed cannabis where parts of the plant are removed or reduced.