



Georgia Access to Medical Cannabis Commission

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VIA ELECTRONIC FEDERAL DOCKET MANAGEMENT SYSTEM

July 22, 2024

United States Drug Enforcement Administration (“DEA”)
8701 Morrissette Drive
Springfield, Virginia 22152

RE: Response to Notice of Proposed Rulemaking (Federal Register Docket No. DEA-1362)

Dear Administrator Ann Milgram:

The Georgia Access to Medical Cannabis Commission (“GMCC”) supports and shares the viewpoint expressed by the U.S. Department of Health and Human Services that marijuana has a currently accepted medical use.

The GMCC is an executive state agency whose commission members are appointed by Georgia’s Governor, Lieutenant Governor, and Speaker of the House of Representatives. GMCC Members have been composed of public servants with expertise in fields of health care (including practicing physicians and a pharmacist), insurance, law enforcement, local and state government, business, and education.

Georgia’s medical cannabis program was created by state law which requires the involvement and collaboration among the state’s health-focused agencies including the GMCC, the Georgia Department of Public Health, the Georgia Composite Medical Board, and the Georgia Board of Pharmacy.

The registered patients GMCC serves are the heartbeat of Georgia’s medical cannabis program. It is on behalf of those patients, in memory of those who have passed from their medical conditions, and in honor of those who still need access to medical cannabis for their health conditions, that the GMCC respectfully submits this letter for consideration.

In Georgia, physicians can recommend and certify their patients to use medical cannabis for relief and treatment of the following conditions: acquired immune deficiency syndrome, amyotrophic lateral sclerosis, alzheimer’s disease, autism spectrum disorder, cancer, crohn’s disease, epidermolysis bullosa, intractable pain, mitochondrial disease, multiple sclerosis, parkinson’s disease, peripheral neuropathy, post-traumatic stress disorder, seizures disorders, sickle cell disease, and tourett’s syndrome. Physicians can also authorize and certify their inpatients or outpatients to use medical cannabis as treatment while the patients are in hospice care.

Certified patients are added to Georgia’s Low-THC Oil Patient Registry and issued a patient registry card which permits them to legally access medical cannabis. Patients on the registry have resided in all 159 counties in Georgia. Currently, there are approximately 20,500 patients on Georgia’s patient registry who, collectively, have been certified by over 700 physicians in Georgia. The data trends show that Georgia’s patient registry increases by 1,000 patients each month.

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The majority of patients on Georgia's patient registry are adults: More than 50% of the 20,500 patients on the registry are 50 years of age or older. Approximately 42% of the patients are between 25 and 49 years of age. Approximately 3% of the patients are between 18 and 24 years of age. Approximately 1% are 17 years of age or younger.

Almost 50% of the patients have been diagnosed with "intractable pain" which is defined in state law as "pain that has a cause that cannot be removed and for which, according to generally accepted medical practice, the full range of pain management modalities appropriate for the patient has been used for a period of at least six months without adequate results or with intolerable side effects." More than 25% of the patients have been diagnosed with post-traumatic stress disorder. The remaining 25% of patients on the registry are diagnosed with one of the other qualifying medical conditions mentioned above or are in hospice care.

Georgia's first licensed medical cannabis dispensary opened in April of 2023 which made medical cannabis legally available under state law for the first time. Since then, and through a current number of ten (10) dispensaries licensed by GMCC, patients have purchased and used medical cannabis from these dispensaries in the form of low-THC oil delivered through various product forms such as oil, tincture, transdermal patch, lotion, and capsule. The product forms are similar to those seen in pharmacies for over-the-counter and prescription medications. Related to pharmacies, there are over 30 licensed pharmacies across the state who have been approved by the Georgia Board of Pharmacy to also make medical cannabis products accessible to patients, but have received warnings from the DEA through in-person visits and communications in the last year regarding making such products available to patients on Georgia's registry.


Similar to any kind of over-the-counter medication, prescription medication, or other medical treatment, there are potential benefits and risks of using medical cannabis that physicians and patients should consider and discuss, especially those that pertain to each patient's conditions, medical history, and other vulnerabilities. In Georgia, there have been no reports of adverse events from patients who have used medical cannabis as regulated by the GMCC. GMCC has, and continues to be, committed to leading and maintaining a well-regulated medical cannabis program.

With rigorous laboratory testing standards, packaging and labeling requirements, an emphasis on physician-patient relationships, and a commitment to provide patients with access to licensed dispensaries and pharmacies, Georgia is a nationally leading example of how cannabis can be effectively and safely used for medical purposes.

Whether on Georgia's patient registry or not, we all know at least one person who has, or had, one of the medical conditions mentioned in this letter. And, every patient on Georgia's registry represents a lived experience of how cannabis has an accepted—and necessary—medical use. This is a fact we must recognize whether or not we have lived it ourselves.

Thank you for this opportunity to provide a public comment on a historic proposed rulemaking process. Although the result of this process remains uncertain, the GMCC will continue to put Georgia's patients first. It is our hope that the federal government will put them, and patients in other states, first too.

Best regards,


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