



30.5.07

Hello Frank

I was interested to read the "Frank Update" on cannabis.

There were a number of elements in the briefing which cause me concern:

the image at the top of page 5 seems to show crack paraphernalia (martell bottles, gauze, small glass pipes with white deposits) rather than cannabis paraphernalia; was this intentional?

The section on hash production (p8) is wholly inaccurate; historically Indian Charas was made by rubbing flowering parts so the resin glands would stick to hands and could then be rolled in to balls or sticks; the classic hash production method used in Morocco, Algeria etc is to dry the flowers, rub them through a fine mesh and collect the resin that drops through; scraping dry leaves would not produce hashish. Most UK resin is 'soap bar' an adulterated form of cannabis resin made from leftovers.

Also on page 8, you assert that Skunk "emerged from Western Europe, particularly Holland, in the late twentieth century," The early cross-bred strains and indeed the first "skunks" were originally grown by Americans in California; the Dutch adopted and adapted these strains with American input assisted by emigres from the States.

The relative strengths for different strains are somewhat haphazard; they draw on Cohen's 2004 document, but these in turn are not evidence based and reflect some misconceptions about production methods. It's an obvious truth that good hashish made from a strong plant will have a higher percentage of THC than the plant from which it is made. If a cultivated Moroccan plant has a THC content of 10%, but the plant is dried and screened to make hashish, the hashish will have a far higher THC content than the plant - we've lost all the plant material. If however the product sold is low grade Soap-bar, the THC content is likely to be lower. Good hash is stronger than bad skunk; good oil is stronger than either. But the mainstay in the UK is moderate level skunk, rarely reaching the THC contents of 20%

It's probably worth looking at the link below, and especially the tables:

http://www.unodc.org/unodc/bulletin/bulletin_1982-01-01_3_page009.html Especially note table 4, which has highest THC content

being in Cannabis Oil from India, with the most potent being at 70% THC; also note the relative strengths of resins compared to herbal cannabis. Rather gives lie to the assertion that "cannabis now is stronger than ever before," doesn't it.

For more recent and Europe specific analysis th EMCDDA report on the subject is far better

<http://www.emcdda.europa.eu/index.cfm?fuseaction=public.AttachmentDownload&nNodeID=2950&slanguageISO=EN>, is evidence based and its figures, which are evidence based, are at odds with Cohen's.

On page 9 you say that Cannabis "has been found to affect the immune system." Drugscope et al refute this, saying that "

"There is no conclusive evidence that cannabis impairs immune function to any significant extent. The few studies that have suggested that cannabis has an adverse effect on the immune system have not been replicated. "

<http://www.drugscope.org.uk/druginfo/evidence-select/cannabishealth.htm>

These studies were animal studies, and the effects have not been replicated, to my knowledge in Humans. If you have other evidence please cite references.

A fully referenced set of refutations can be found here, from Erowid:

http://www.erowid.org/plants/cannabis/cannabis_myth5.shtml

I was especially intrigued by the Harm Reduction section, and the bit on page 12 that says "Research suggests that a joint is the least harmful way to smoke cannabis*, leading to less carbon monoxide being inhaled."

Could you please direct me to the research that says smoking cannabis in a joint is less hazardous, and results in less carbon monoxide, than other routes of administration, especially when compared to use of water pipes, or vapourisers. I am suprised that you don't highlight avoidance of tobacco outright as a harm reduction measure;

I can't find any reference within the document to soap-bar contamination, or to contamination of herbal cannabis with glass particles, despite recent DoH concern and bulletins about this. Is this an oversight or no longer a cause for concern.

I look forward to a detailed response to these comments on this new resource pack.

Many thanks

Kevin Flemen
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