

Honourable Minister Jean-Yves Duclos
House of Commons
Ottawa, ON
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February 11, 2022

Re: Therapist Training in Psilocybin -Assisted Therapy

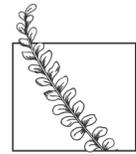
Dear Honourable Minister Jean-Yves Duclos,

Health Canada will be aware that psilocybin-assisted psychotherapy has emerged as one of the most promising areas in mental health treatment building on a foundation of years of traditional use. A key challenge is the lack of properly trained providers of psilocybin assisted psychotherapy. We are writing to encourage you to urgently create a mechanism, free from the burdens of a clinical trial, to allow healthy volunteer therapist trainees to experience psilocybin as part of their training to provide psilocybin-assisted therapy to those struggling with mental health conditions in Canada.

There is a broad rationale for encouraging you to allow for experiential psilocybin training outside of a clinical trial. For instance, we have obtained independent advice from a member of the UBC Research Ethics Board (REB), who confirmed that it was not ethical to conduct a clinical trial for therapist training in the absence of a specific research question. This individual reflected on the U.S. NIH's Clinical Centre's [7 ethical principles](#), which are somewhat more fulsome than the TCPS2 and include relevant elements including "social and clinical value" and "scientific validity" (though there is overlap with the "respect for persons" and "justice" elements in [TCPS2](#)).

This opinion was provided based on the knowledge that the effects of psilocybin in healthy human subjects (including therapist trainees) are known, so the principle of clinical equipoise is not met. Lastly, they shared that the UBC REB is routinely confronted with the question of fair use of time and resources when there is no clear benefit of a trial to study participants or society at large. This individual pointed to the fact that there is limited bandwidth with ethics boards, and it was also not ethical to consider intensive research proposals geared towards meeting the expectations of policy makers or regulators rather than valid research needs.

Some of this sentiment is reflected in the NIH ethics guidelines. For instance, under "social or clinical value," it states "answers to the research question should contribute to scientific understanding of health or improve our ways of preventing, treating, or caring for people with a given disease to justify exposing participants to the risk and burden of research." Under scientific validity, it states: "Invalid research is unethical because it is a waste of resources..." While certain synthetic psychedelic drugs may be appropriate for restricting training to clinical trials, we do not feel this is necessary or appropriate for psilocybin experiential training with natural forms of psilocybin.



There is also the additional context of the responsibility of Health Canada to establish pathways for access that recognize the sovereign rights of Indigenous Peoples under the *United Nations Declaration on the Rights of Indigneous Peoples* (UNDRIP) in their historical and ongoing use of certain sacred medicines here on Turtle Island. For obvious reasons, it is not ethical restrict access to psilocybin experiential training for any self-identified Indigenous practitioners to clinical trials.

Sincerely,

A handwritten signature in black ink that reads "L Farrell".

Lindsay Farrell, PhD
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A handwritten signature in blue ink that reads "Evan Wood".

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A handwritten signature in black ink that reads "Payton Nyquvest".

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