

Good afternoon,

I write with regard to the submission of the Comité des Connétables on the Draft Harbours (Inshore Safety) (Jersey) Amendment Regulations 202- Review:

[https://statesassembly.je/getmedia/41269694-ca40-44b7-b3c1-0b8ab767e70d/Submission-Draft-Harbours-\(Inshore-Safety\)-\(Jersey\)-Comite-des-Connetables-290525.pdf](https://statesassembly.je/getmedia/41269694-ca40-44b7-b3c1-0b8ab767e70d/Submission-Draft-Harbours-(Inshore-Safety)-(Jersey)-Comite-des-Connetables-290525.pdf)

It is disappointing to read the Comité conflate concerns around medicinal cannabis use and recreational drug use. Medicinal cannabis is clinically prescribed and has been proven to be beneficial to a great number of Islanders.

The Comité refers to the Road Traffic (Jersey) Law 1956 and the lack of prescribed limits for drugs (unlike alcohol), while continuing to mention medicinal cannabis.

It is important to note that amendments to the Road Traffic (Jersey) Law 1956 that would invoke prescribed limits would include a medical defence where such a drug was being used as prescribed, as in Section 5A of the UK Road Traffic Act 1988 and Section 2C(3) of the recently adopted Road Traffic (Drink Driving) (Guernsey) Law, 1989 (Amendment) Ordinance 2025:

<https://www.cps.gov.uk/legal-guidance/road-traffic-drink-and-drug-driving>

<https://www.gov.uk/government/publications/drug-driving-and-medicine-advice-for-healthcare-professionals/drug-driving-guidance-for-healthcare-professionals>

<https://www.gov.gg/CHttpHandler.ashx?id=186978>

Concerns specifically relating to medicinal cannabis being used as prescribed while under charge of a vessel are therefore irrelevant.

Regarding cannabis more generally, it should be noted that cannabis can remain in the bloodstream for several weeks after use and therefore detection of THC metabolites in bodily fluids may not imply recent use:

https://ntcrc.org/wp-content/uploads/2020/06/DCRVolume5.1-2_The_Marijuana_Detection_Window.pdf

Also, it is important to note that there is no correlation between the concentration of THC metabolites in bodily fluids and impairment:

<https://norml.org/news/2024/04/04/review-detection-of-thc-in-bodily-fluids-not-correlated-with-impairment/>

Kind regards,
Simon Harrison.

Coordinator @ End Cannabis Prohibition Jersey

<https://cannabis.org.je>

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