

Frankfurt am Main, August 8, 2025

Supply Security and Abuse Prevention: Constructive Proposals on the Draft Legislation by the Federal Ministry of Health (BMG)

At the start of the new legislative period, the Federal Ministry of Health has presented a draft law proposing changes to the medical cannabis law in the areas of prescription and shipping. As the German market leader in medical cannabis, Cansativa Group, based in Frankfurt am Main with over 3,000 connected pharmacies, we understand the supply realities at all levels — from import logistics to wholesale distribution to dispensing in pharmacies. Our experience as a fully integrated import and export provider and pharmaceutical service provider enables us to assess the draft law with a practical and patient-focused perspective grounded in supply practice in Germany. Our goal is to provide constructive input for a patient-centered and future-proof regulation and to highlight practical solutions for effective abuse prevention.

Practical impulses for patient-oriented and safe medical cannabis supply

The draft law, motivated by rising import numbers and only moderately growing statutory health insurance (GKV) prescriptions, assumes increased medical cannabis misuse and proposes extensive restrictions on prescription and distribution. This approach is too narrow and overlooks central aspects of the supply reality. Our experience shows that a large portion of imports initially remain in storage, is further processed, re-exported, or destroyed due to quality reasons. The GKV statistics represent only a subset of the real supply situation: the increase in private prescriptions occurs against the background of deliberate discontinuation of classification as a narcotic, not a failure, but as a result of new framework conditions enabling people to access treatment without GKV cost coverage. To comprehensively restrict this, differentiated measures and binding quality standards are needed to ensure reliable supply and reduce misuse. Furthermore, Germany is increasingly becoming a European hub for the medical cannabis trade (see our [Policy Brief Q2 2025](#)). The import statistics therefore do not provide reliable feedback on actual consumption or misuse levels but reflect a complex, Europe-wide embedded market and supply structure.

We see that some non-compliant providers exploit regulatory grey areas and issue prescriptions without a proper medical history. Such practices damage not only trust in medical cannabis but also threaten supply security and acceptance of established therapy forms. We advocate targeted measures that distinguish between unscrupulous business models and regular medical supply.

The Digital Prescription Practice is Already Part of the Solution

The draft law proposes a blanket ban on telemedical prescriptions of medical cannabis. However, this measure is not purposeful and would reduce real supply security. We advocate that telemedical prescriptions should instead be permitted under binding quality standards - especially a structured digital risk assessment¹, typically involving a video consultation. This is a proven, safe, and legally robust instrument already used for many prescription-required therapies. It is essential that German medical professionals are actively involved in the entire process, including fair compensation and treatment management, to ensure the quality and consistent availability of medical cannabis prescriptions.

Digital care structures demonstrably promote treatment continuity and relieve the healthcare system, especially in underserved regions. Video consultations and telemedical treatment forms are increasingly used by general practitioners and specialists both at home and on site to care for patients digitally². A functioning telemedical supply must not be discredited by non-transparent business models but firmly anchored in the healthcare system. Quality requirements must apply not only to individual indications like medical cannabis but more broadly and indication-overarching, to set a standard for all digital treatment offerings and maintain medical therapy quality.

Shipping as a Complement to Local Pharmacies Strengthens Supply Security

A blanket ban on shipping medical cannabis flowers, as proposed in the draft law, does not solve the problem of abusive prescriptions and could cause critical supply gaps. We therefore advocate continuing a combination of shipping and local pharmacy to ensure comprehensive care. In Germany, pharmacies are always physical, stationary establishments. Some of these pharmacies hold licenses to ship medical cannabis and use shipping as a proven distribution channel to reliably reach patients nationwide. Stationary pharmacies play a vital role in patient care, safety, and prevention, and by shipping medical cannabis flowers, they can directly and reliably supply patients in rural areas, effectively closing supply gaps.

Only a fraction of German pharmacies dispense medical cannabis. As Cansativa Group, we supply around 3,000 pharmacies nationwide and thus nearly all that regularly dispense medical cannabis. In our supply practice, shipping medical cannabis has proven to be a patient-oriented supply route—especially where access to specialized local pharmacies is limited. Without shipping, many patients would have difficult access to their therapy and be pushed back into uncontrolled, illegal sources. Therefore, differentiated measures are needed to ensure both supply security and abuse prevention without jeopardizing functioning structures.

¹ Cf. Bundesmantelvertrag (2025), <https://www.kbv.de/infothek/rechtsquellen/bundesmantelvertrag>

² Association of Statutory Health Insurance Physicians of Lower Saxony: Decision of the Evaluation Committee on the Flexibilization of Video Consultations (April 2025), <https://www.kvn.de/Mitglieder/Publikationen/KVNnachrichten+April+2025/Beschluss+des+Bewertungsausschusses+Weiterer+Flexibilisierung+der+Videosprechstunde+und+neuer+Zuschlag-p-43087.html>.

We would be happy to engage in a deeper exchange, share our professional perspectives, provide input, and discuss sustainable solutions for future-proof regulation.

Further information:

In the [position paper](#) of the Federal Association of Pharmaceutical Cannabis Companies (BPC), of which we are board members, you will find detailed explanations on relevant aspects of the draft law.

About Cansativa Group

Cansativa Group is Europe's leading wholesaler of medical cannabis and has been a reliable partner for patient-oriented supply since 2017. As a family business with long-standing industry experience and market leadership in the growing European medical cannabis market, Cansativa stands for quality, safety, and supply expertise.

From import and export of goods, quality testing, and distribution to over 3,000 pharmacies including transport logistics to knowledge transfer, we are a one-stop shop in the industry. As a service provider for medical cannabis supply in Germany, Cansativa Group regularly brings in expert knowledge and serves as a contact partner.

Cansativa Group has its headquarters in Mörfelden-Walldorf and a location in Frankfurt am Main. With 80 employees, the company is a key player in the medical cannabis market—professional, future-oriented, and close to the political center.



Benedikt Sons

Co-Founder, Managing Director and CEO



Jakob Sons

Co-Founder, Managing Director