

May 18, 2023

ATTN: John Clare

Director General

Strategic Policy, Cannabis

Controlled Substances and Cannabis Branch

Email: cannabis.consultation@canada.ca

RE: Notice of Intent - Consultation on Potential Amendments to the Cannabis Regulations

INTRODUCTION:

The Middlesex-London Health Unit (MLHU) appreciates the opportunity to participate in Health Canada's consultation on *Potential Amendments to the Cannabis Regulations*.

We would like to commend Health Canada for recognizing the importance of setting out clear regulations and developing a legislative framework that aims to protect the health and safety of Canadians. The maintenance of strict regulations and controls governing the production and sale of cannabis is vital to mitigating the potential health and safety harms from these products.

A public health approach to cannabis regulation aims to find the balance between making regulated legal cannabis accessible while removing commercial influence and promotion of the product. There are health harms associated with cannabis consumption, but harms can be minimized with a thoughtful and intentional public health regulatory approach.

The recommendations that follow correspond to three of the five priority areas for which Health Canada has requested feedback, specifically:

- Priority Area 3: Production requirements for cannabis products;
- Priority Area 4: Packaging and labelling requirements for cannabis products; and,
- Priority Area 5: Record keeping and reporting for cannabis license holders.

The recommendations contained within this submission support Health Canada's goals to:

1. Reduce the risks of accidental consumption and overconsumption;
2. Reduce the appeal of cannabis products to young people; and,
3. Provide consumers with the information they need to make informed decisions before using cannabis products.

Priority Area 3: Production requirements for cannabis products

4. Should the limits on the maximum quantity of delta-9-THC that can be contained in a cannabis product (by container and ingestible unit) apply to the sum total of all intoxicating cannabinoids found in the product? Why or why not? How could such a requirement be established in an efficient manner that is simple to comply with?

RECOMMENDATION

Yes. The maximum quantity of delta-9-tetrahydrocannabinol (THC) that can be contained in a cannabis product (by container and ingestible unit) should apply to the sum total of all intoxicating cannabinoids found in the product. Until more research is completed, product manufacturers should be required to account for and communicate any potentially intoxicating substances to consumers. Moreover, maintaining current limits of intoxicating cannabinoids within the standards set by the *Cannabis Act*, will continue to protect public safety.

RATIONALE

Consumers have the right to be informed of the presence and quantity of intoxicating cannabinoids in the product they are consuming as this can affect their level of impairment which can increase the potential for health harms. As more research becomes available on the effects of other intoxicating cannabinoids, Health Canada is encouraged to ensure the maximum amount of such cannabinoids equates to the current limits for delta-9-THC. This will help continue to minimize the potential impact on public health and safety.

It is recommended Health Canada continue to restrict the quantity of delta-9-THC or equivalent intoxicating cannabinoid effect to:

- Edibles - 10 mg per package
- Ingesting - Cannabis Extract 10 mg of THC per unit (such as a capsule) or dispensed amount 1000 mg of THC per package
- Inhaling - Cannabis Extract: 1000 mg of THC per package
- Topical Cannabis - 1000 mg of THC per package (Government of Canada, 2018)

Priority Area 4: Packaging and labeling requirements for cannabis products

1. Should Health Canada consider amending packaging requirements for dried and fresh cannabis?

RECOMMENDATION

MLHU recommends that existing *Regulations* for cannabis product packaging remain in effect, including:

- Plain, opaque/translucent packaging in accordance with colour/font restrictions;
- Child-resistant packaging with tamper-evident controls in place;
- A prohibition on coatings, cut-outs, or peel-away labels;
- A prohibition on hidden features, including heat-activated ink or scent-features;
- A prohibition on the use of images or brand information on the wrapper; and,
- No more than 30g of dried cannabis in one immediate container.

In addition, MLHU recommends Health Canada considers restricting all packaging to a plain and standardized colour (e.g., brown or grey).

MLHU recommends that alternative packaging materials are investigated and mandated by way of regulation to address the issues of waste from cannabis product packaging. Current packaging requirements should be maintained to the fullest extent while also considering alternative, environmentally conscious materials in accordance with the Government of Canada's ambitious plan to reduce plastic pollution.

RATIONALE

The current *Cannabis Regulations* require plain packaging and labelling for all cannabis products. The aim of this approach is to reduce the risks of accidental consumption and overconsumption as well as reducing the appeal of cannabis products to young persons. Additionally, consumers are provided with the information they need to make informed decisions before using cannabis. As such, these requirements should be maintained.

The current *Regulations* restrict colours to a single uniform colour, prohibiting the use of fluorescent colours on containers or wrappers or metallic colours on containers. We recommend that packaging (including wrappers and internal and external packaging) be restricted to one standardized colour, ensuring there is a contrast with the yellow colour of the health warning message and the red colour of the standardized cannabis symbol. This eliminates the ability for the industry to select background colours for branding and would align with the more stringent requirements for tobacco packaging. Tobacco research indicates that dark brown product packaging is dissuasive in the United States (Hammond et al., 2011; Al Hamdani et al., 2020). Continued research specific to cannabis packaging is important to further understand the impact of packaging elements on cannabis use behaviours.

Health Canada should maintain current packaging requirements for public health and safety. However, in accordance with the Government of Canada's commitment to bring forward measures to prevent plastic pollution and to reduce the amount of waste that ends up in landfill sites, alternative recyclable packaging options should be considered to minimize any potential environmental impact of cannabis product waste.

2. Are there labelling requirements that could be changed without public health or public safety impacts? What required information should remain, and what information could be removed? Why or why not?

RECOMMENDATION

MLHU recommends Health Canada maintain all existing labeling requirements, and not remove any information.

RATIONALE

Current labelling requirements include the standardized cannabis symbol, mandatory health warning message, and specific product information (e.g., brand name of the cannabis product, class of cannabis, THC and CBD information, license holder information, ingredients, etc.). These requirements should remain in place as they contribute to reducing the risks of accidental consumption, overconsumption, and reduce the appeal of cannabis products to young persons. Cannabis labelling provides consumers with the information they need to make informed decisions before using cannabis. Mandated health warnings on tobacco products are proven to be an effective

strategy to increase awareness of the health harms associated with tobacco and to reduce tobacco product use (Cunningham, 2022). Similarly, cannabis research has found that brand imagery on packaging can increase the appeal of cannabis products whereas plain/standardized packaging with health warnings decreases appeal, especially to youth and young adults (Leos-Toro et al., 2021). It is recommended that Health Canada continues to apply this body of evidence to cannabis product regulation.

3. Do you have any suggestions to simplify the requirements to include delta-9-THC and CBD content information on product labels?

RECOMMENDATION

MLHU recommends continued regulation of cannabis labelling that provides consumers with the information they need to make informed decisions before using cannabis, including labelling of cannabinoids within products.

MLHU does not have any specific suggestions of how to simplify the requirements to include delta-9-THC and CBD content information on product labels but recognizes the importance of consumer product comprehension to assist in protecting public health and safety.

MLHU recommends further consumer education about the potential effects of THC/CBD, including Canada's Lower-Risk Cannabis Use Guidelines, to help individuals understand how to reduce risks to their health when consuming cannabis products. This could be achieved via a website link on the label in addition to more comprehensive federal public health education initiatives.

RATIONALE

From a public health perspective, the labelling requirements for cannabis (THC/CBD content) are meant to provide consumers with clear, easy to read, and understandable information when it comes to the contents of the product (Government of Canada, 2016). Cannabis product labels are only effective if their meaning is clear to the consumer. While consumers need to know how much THC and CBD a product contains, they also need to understand how the products and the amounts of cannabinoids found within products can affect their health and well-being.

Investigation into consumer product comprehension has shown that the current manner in which information is provided on cannabis products can be difficult for individuals to interpret and put into context (Health Canada, 2020). Therefore, comprehensive consumer education about the potential effects of THC/CBD may aid in product label understanding by consumers. Canada's Lower-Risk Cannabis Use Guidelines provide recommendations for individuals to reduce their health risks from cannabis use (Fischer et al, 2017), and increase consumer understanding of ways to reduce their risk when consuming cannabis products. The development of a comprehensive public health education strategy to inform youth and young adults about the potential health harms from cannabis use and strategies to reduce those risks is warranted.

4. Should the requirement to include delta-9-THC content information on product labels apply to the total of all intoxicating cannabinoids, such as delta-8-THC? Why or why not? How could such a requirement be established in an efficient manner that is simple to comply with?

RECOMMENDATION

For public safety and consumer knowledge, MLHU recommends that cannabis product labels include the amounts of any intoxicating cannabinoids in a product, and that labelling continues to be based on regulated laboratory testing. Efforts should be taken to increase consumer understanding of lower risk and higher risk use, including quantities or concentration of cannabinoids, and potential physiological effects of both intoxicating and non-intoxicating cannabinoids.

We recommend that any new cannabis product (including semi-synthetic cannabinoids) continue to be assessed for safety under the *Cannabis Act* and that any potential effects are communicated effectively to consumers.

RATIONALE

Labelling all intoxicating cannabinoids found within cannabis products allows consumers to make informed choices about their cannabis consumption. It is important to note that cannabis labels are only effective if their meaning is clear to the consumer. While consumers need to know how much THC and CBD a product contains, they also need to understand how those amounts can affect their health and wellbeing.

The continuous monitoring of identified cannabinoids and their impacts on consumers was recommended by the Canadian Task Force on Cannabis Legalization and Regulation. The Task Force highlighted the need for “a flexible legislative framework that [can] adapt to new evidence to set rules for limits on THC or other components” (Government of Canada, 2016).

5. Are there other packaging and labeling requirements that Health Canada should consider for a regulatory amendment? Why and what is the current impact of these requirements on licence holders and consumers?

RECOMMENDATION

Continue to strictly regulate packaging and labeling and implement further restrictions to reduce appeal to young persons. In addition to the current requirements outlined in the *Regulations*, MLHU recommends implementing the following:

- Ban the words “candy” or “candies” on packages;
- Include “not for kids” text on the package label;
- Require safer storage messaging on all packages to address ways to reduce risk of unintentional exposure of this product to children (e.g., “This product can cause harm if consumed by children. Keep out of reach of children in a locked area, and store in original packaging.”);
- Restrict packaging colour to a standardized, single, uniform colour (e.g., brown or grey);
- Consider methods to educate and promote additional health messaging contained within Canada’s Lower-Risk Cannabis Use Guidelines. For example, this might be achieved by including a website link on the cannabis product label, the inclusion of a statement on the package itself, or the roll-out of a comprehensive federal public health education strategy; and,

- Require labels for all cannabis-infused products intended for ingestion to include a health statement about the delayed onset of impairing effects and information on accidental ingestion or overconsumption.

RATIONALE

Maintaining and strengthening measures to reduce risks of accidental consumption, overconsumption, and appeal of products to infants, children, and young people are critical. If the current *Regulations* are relaxed or omitted on cannabis products, it may provide ambiguity of rules and lead to packaging and labelling practices which are harmful to consumers and may increase appeal to vulnerable individuals such as youth and children.

Despite efforts to regulate cannabis packaging and public health measures to remind adults to lock cannabis products up and out of reach of children and youth, the incidence of cannabis overdose in children continues to rise. A recent study published in 2022 found that the proportion of cannabis-related emergency department visits for children aged 0-9 in Ontario increased significantly after the legalization of cannabis edibles (Myran et al., 2022).

The Poison Control Centre in Ontario states the following on their website: “The Poison Centre is seeing an increase in cases of children unintentionally eating edible cannabis products and requiring hospital admission. In many cases these products were unregulated, looked almost identical to popular brands of candy, and contained many more milligrams of THC than approved by Health Canada. While cannabis use is legal in Canada, there are many products available on the market that are unregulated, meaning that they do not come from an authorized provincial or territorial retailer.” This demonstrates what can happen when regulations around packaging become more lenient: increased harms to children by unintentional consumption. These statistics also demonstrate the need for further action to prevent unintentional consumption by children.

Prohibiting the use of the words “candy” or “candies” would further enhance the existing plain packaging requirements. “Candy” is an easily recognizable and enticing word to children and youth. Following legalization, Colorado saw an increase of edible-related cannabis overdoses, increased calls to poison control centres, and increased ER visits for accidental ingestion by children (Wang et al., 2016). To combat accidental consumption by children and youth, Colorado has banned the word “candy” or “candies” on packaging (State of Colorado, n.d.). Similarly, Washington State has mandated “not for kids” warning labels on cannabis products (Washington State, 2019).

Plain packaging and the inclusion of health warnings on labels reduces appeal, brand influence, and enticements to purchase and use products. They also increase awareness of harms associated with use. This approach has been shown to be effective through tobacco product research (Dronvandi et al., 2019; Gravely et al., 2021), as well as cannabis product research (Goodman et al., 2019; LeosToro et al., 2021). The current *Regulations* restrict colours to a single uniform colour, prohibiting the use of fluorescent colours on containers or wrappers or metallic colours on containers. MLHU recommends that packaging (including wrappers and internal and external packaging) be restricted to one standardized colour, ensuring there is a contrast with the yellow colour of the health warning message and the red colour of the standardized cannabis symbol. This approach would limit the industry’s ability to select background colours for branding purposes and would align with the more stringent requirements for tobacco product packaging. Tobacco research has shown that dark brown packaging is more dissuasive in the United States (Hammond et al., 2011; Al Hamdani et al., 2020).

Continued research specific to cannabis packaging is important to further understand the impact of background colours on cannabis use behaviours.

Labeling is an important resource for consumers in making informed decisions about using cannabis. We recommend including information on Canada's Lower-Risk Cannabis Use Guidelines, which could be accomplished through a website link on the product label or the inclusion of a statement from the Guidelines on the package. Lower-risk and safer-use messaging is important for everyone who uses cannabis, especially people who are first trying a product. It is important for warning messages to be clear and to use language that does not leave room for doubt by the consumer (Al Hamdani et al., 2020).

Priority Area 5: Record keeping and reporting for cannabis licence holders

6. Should Health Canada remove the requirement to provide a promotion expenditure report to Health Canada? Why or why not?

RECOMMENDATION

It is recommended that Health Canada continue to require cannabis license holders to provide a report of any promotional expenses and activities related to cannabis. This includes any money spent on the promotion of cannabis accessories or services related to cannabis. Health Canada should also monitor industry practices with marketing and advertising to reduce normalization of cannabis use and incentives or cues to use cannabis products. In addition, it is recommended that Health Canada mandates the cannabis industry to publicly disclose costs and activities associated with influencing government policy reform.

RATIONALE

The *Cannabis Act* generally prohibits the public promotion of cannabis. This is to support the Government's objective to protect public health and safety, and to protect vulnerable populations such as youth from exposure to cannabis and enticements to use cannabis. By requiring license holders to report on promotion expenditures, Health Canada can monitor industry practices to ensure they are staying compliant with prohibited practices and ensure the types of promotions are not directly or indirectly enticing individuals to use cannabis. In addition, by continuing to monitor promotion expenditures, Health Canada can ensure that the industry is not spending an excessive amount of funding on promotions, given evidence that marketing practices can influence substance use behaviour and potential harms (Leos-Toro et al., 2021).

The extent to which cannabis is promoted to individuals may influence their decisions to purchase and use cannabis. Health Canada can incorporate the substantial evidence of the impact of alcohol marketing on drinking behaviour and translate that to cannabis regulations. It has been shown that exposure to alcohol advertising can act as environmental cues to drink, influence social norms, and influence lifestyles such as an individual's motives to drink and drinking patterns (Giesbrecht & Wettlaufer, 2013). In addition, restricting promotions will remove incentives to drink and cues to drink (PHAC, 2018; Giesbrecht & Wettlaufer, 2013; Liem, 2018; WHO, 2018). The application of the evidence from alcohol consumption combined with lessons learned from tobacco control literature is recommended to inform requirements pertaining to mandatory industry reporting.

OTHER CONSIDERATIONS FOR THE PRODUCTION OF CANNABIS

In addition to the labelling and packaging requirements, we recommend the following production restrictions be implemented to further reduce appeal to young people, minimize undue inducements to purchase or use cannabis products, and to enhance the safety of products for consumers:

- Restrict the shape of cannabis products and accessories further, by banning the use of shapes, sprinkles, or bright colours that may appeal to children (e.g., bright colours, recognizable shapes like real or fictional animals or humans or fruit shapes.)
- Prohibit the use of flavouring agents in cannabis extracts.
- Prohibit any product that resembles or mimics familiar food items, or is associated with a well-known brand of food or candy and could be appealing to children, such as gummy bears, lollipops, well-known chocolate bars or cookie brands, etc.
- Require that edible products be stamped, marked or imprinted with the standardized THC symbol on at least one side of the edible product itself. An exception for products that are impracticable to stamp, mark or imprint, such as liquids, would be required.

RATIONALE

Products that resemble familiar food items or are associated with well-known brands of food or candy could be appealing to children, such as gummy bears, lollipops, well-known chocolate bars or cookie brands (Government of Canada, 2016; University of Washington School of Law, 2016; General Assembly of the State of Colorado, 2016).

COMMERCIAL DETERMINANTS OF HEALTH

The request for consultation states, “Health Canada recognizes there may be regulatory measures that could be made more efficient and streamlined without compromising the public health and public safety objectives in the *Act*”, and we appreciate that Health Canada has emphasized that efficiencies will not compromise public health and safety objectives.

We ask that Health Canada takes into account the Commercial Determinants of Health when considering any recommendations that are submitted, and that any amendments proposed put public health and safety before benefits that would be afforded to the industry. The Commercial Determinants of Health “are a key social determinant, and refer to the conditions, actions and omissions by commercial actors that affect health” (WHO, 2021). Industry actions, such as production and targeted marketing of products, can impact and shape the physical and social environments that people live in, and ultimately impact their health. The potential impacts on health from cannabis include child poisonings, overdose, and/or effects on parenting through use of their products. Early age of onset of use and the continued use of cannabis increases the risk of dependency and mental health problems, and can impact memory, concentration, academic success and decision-making. When smoked, cannabis use impacts lung health, increasing risk of bronchitis, lung infections, chronic cough, and mucus (Health Canada, 2022). Cannabis products are not a benign substance, and as such, it is recommended they be regulated to control commercial influence.

Product packaging, labeling, product manufacturing, and advertising are particular areas of focus where industry may not, and historically have not, put public health and safety above industry profits and benefits.

It has been documented that corporations actively mislead and confuse the public when it comes to the harm their products cause (Mailon, 2022; Ulucanlar et al., 2016; Humphreys et al., 2022). The study of internal documents across tobacco, alcohol, chemical, soft drink, sugar, and pharmaceutical industries has formed a body of evidence describing the ways that corporations seek to produce and distribute research findings that are favourable to their interests, to suppress findings that are not, and to create doubt around the scientific agreement (Mailon, 2022; Humphreys et al., 2022). Another way corporations influence mainstream thinking is by capturing civil society through corporate front groups, philanthropic efforts, consumer groups and think tanks, allowing them to create doubt and promote their framing of the products they produce and their messages (Mailon, 2022; WHO, 2021).

Thank you for the opportunity to provide input on the potential amendments to the *Cannabis Regulations*. We would be happy to discuss any of our recommendations or comments upon your request and look forward to the summary from Health Canada following this consultation.

Sincerely,



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