



Ontario Public Health Association
 l'Association pour la santé publique de l'Ontario
 Established/Établi 1949

The mission of OPHA is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario.

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Dear Sir/Madame,

Executive Director
 Pegeen Walsh
 E-mail: PWalsh@opha.on.ca

RE: Strict regulation of edible cannabis, extracts and topicals

Constituent Societies

The Ontario Public Health Association (OPHA) is a member-based, non-profit, non-partisan organization which has been providing an independent voice for public health for 70 years. We bring together a broad spectrum of individuals and groups from various backgrounds and sectors, all of whom are committed to promoting the health and wellbeing of Ontarians.

Alliance for Healthier Communities

Association of Public Health
 Epidemiologists in Ontario (APHEO)

OPHA's Cannabis Task Group has been encouraging the Federal Government to adopt a public health approach to cannabis regulation to mitigate and minimize cannabis-related risks and harms. In 2017, our Cannabis Task Group conducted a comprehensive analysis and literature review to inform the development of a policy [position statement](#) on the public health impacts of cannabis legalization in Canada. In 2018, the Task Group offered [recommendations](#) on the proposed regulations for packaging and labelling of cannabis products.

Association of Supervisors of
 Public Health Inspectors of Ontario
 (ASPPIO)

Canadian Institute of Public Health
 Inspectors (Ontario Branch) (CIPHIO)

Community Health Nurses'
 Initiatives Group (RNAO)

OPHA appreciates the opportunity to participate in Health Canada's consultation on the proposed regulations amending the *Cannabis Regulations* (New Classes of Cannabis) and the Proposed Order amending Schedules 3 and 4 to the *Cannabis Act*. OPHA is pleased that the proposed regulations have among its key purposes protecting public health and safety.

Health Promotion Ontario (HPO)

Ontario Association of Public
 Health Dentistry (OAPHD)

Below, we reiterate the importance of minimizing cannabis-related harms and offer a summary of recommendations to further strengthen the capacity of the proposed regulations to ensure public health and safety. The recommendations outlined in this submission are consistent with those put forward in our earlier submissions, which align with the goals of the Federal Task Force on Cannabis Legalization and Regulation's 2016 [discussion paper](#).

Ontario Association of Public Health
 Nursing Leaders, (OAPHNL)

Ontario Dietitians in Public Health
 (ODPH)

Cannabis-related harms & protecting youth

Ontario Society of Physical Activity
 Promoters in Public Health (OSPAPPH)

Cannabis consumption is associated with both short- and long-term health impacts, and cannabis edibles, extracts and topicals pose additional unique risks to consumers. Such classes of cannabis can result in delayed onset of effects up to two hours after consumption (e.g., cannabis edibles) and can be of higher potency when made from

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concentrates (e.g., cannabis extracts and topicals.) Both of these factors increase the risk of overconsumption.

While it is critical to prevent overconsumption in all age groups, it is especially important to protect Canadian youth. According to Statistics Canada, 42% of males and 40% of females aged 15-24 in Ontario reported having consumed cannabis at least once in 2012. Given that brain development is not complete until age 25, youth are particularly vulnerable to the effects of cannabis on brain development and function. In a recent meta-analysis, authors found that regular cannabis use was related to a low to medium risk for developing depression and a high risk for suicidal attempts. These findings further suggest that cannabis may be harmful to developing brains.

Summary of OPHA Recommendations

Outlined below is a summary of OPHA's recommendations for the regulation of edible cannabis, extracts and topicals. These recommendations align with those proposed by the Federal Government's Task Force on Marijuana Legalization and Regulation, and have among their key objectives to protect Canadian youth. They also aim at: protecting public health and safety; ensuring Canadians are well-informed; establishing and enforcing a system of strict production, distribution and sale; and finally, conducting ongoing data collection.

THC Limits

- Make multiple lower potency options of edible cannabis (e.g. 5 mg THC per discrete unit) available on the market for novice consumers
- Set more conservative limits for cannabis extracts and topicals (e.g. 50-100 mg THC per container) that align with regions such as Colorado, Oregon and Alaska
- Restrict the variability of dosage of cannabis edibles and extracts to +/- 10% to align with current acceptable dosage for medicinal ingredients in Canada's Food and Drug Regulations (C.01.062 (1))

Ingredients and Additives

- Prohibit the addition of nicotine and of non-naturally occurring caffeine and limit daily values of fat, sugar and salt (e.g. all under 5%)
- Define "appealing to youth" and include all considerations included in vaping and tobacco regulations to ensure products are not "appealing to youth"
- Place strict limits on the types of allowable flavours to minimize the chance of flavors appealing to youth (e.g., restrict fruit, dessert, candy and menthol or other characterizing flavors)
- Adopt a comprehensive ban on flavours and additives and enforce strict limits on the potency of cannabis extracts and topicals, in addition to edibles
- Provide warning labels for other ingredients that may enhance the absorption of THC from edibles in some way

Packaging

- Mandate health warnings (e.g., "do not combine with alcohol or other drugs"; "onset of effects of THC may be delayed for several hours"; and "keep out of reach of children") that cover 75% of packaging
- Mandate messaging from Canada's Lower-Risk Cannabis Use Guidelines, and information regarding product effects, safe disposal, and poison control
- Mandate listing of ingredients, allergens, % DVs, and cannabis-specific nutrition facts table standardized in appearance to ensure consumers can make informed decisions
- Mandate standardized packaging to prevent marketing to specific demographics

- Mandate the cannabis symbol, health warnings and THC and CBD content on all cannabis products and on all vaping devices/products/accessories
- Prohibit health and nutrient claims

Good Production Practices

- Implement additional inspections by compliance and enforcement officers, mandatory and standardized preventative education, and progressive measures for non-compliance for the first 6-months once regulations are in effect
- Clarify and provide further details on the recall process
- Require that shipping of cannabis products be entirely separate from conventional foods and stipulate that cannabis edibles may not be sold outside of original, approved packaging once distributed

Additional Recommendations

- Enhance public education on risks of overconsumption owing to delayed effects of edible cannabis as compared to smoking cannabis
- Decrease the risk of co-use of other substances (e.g. alcohol) through limitations on acceptable places of use and requirements for stand-alone speciality stores, which will also limit exposure to minors
- Consult with the Ministry of Labor to ensure health and safety of the worker growing, manufacturing and producing cannabis product
- Ensure all packaging is recyclable to protect both human and environmental health

Please refer to **Appendix A** for more detailed responses to the specific online consultation questions regarding the proposed regulations to cannabis edibles, extracts, and topicals. Our recommendations call for a regulatory framework that is comprehensive, evidence-informed and committed to protecting public health and safety, especially children and youth

OPHA, through our Cannabis Task Force, will continue to advocate for a public health approach to cannabis regulation. We welcome opportunities to collaborate with your department in any initiatives aimed at raising public awareness and promoting Canadians' health and safety.

Thank you for the opportunity to provide input into the proposed regulations on these new classes of cannabis.

Sincerely,



Pegeen Walsh
Executive Director, OPHA



Elena Hasheminejad
Cannabis Task Group Co-Chair, OPHA

Appendix A: OPHA's Responses to Survey Questions

Please find below OPHA's responses to Health Canada's survey questions on the proposed amendments to the Cannabis Regulations (New Classes of Cannabis) and the Proposed Order amending Schedules 3 and 4 to the Cannabis Act.

1. What do you think about the proposed THC limits for the new classes of cannabis products?

Canada's Lower-Risk Cannabis Use Guidelines recommend limiting the amount of THC-content in cannabis products to help mitigate the risks of both acute and chronic problems associated with cannabis use. High THC content in cannabis is linked to mental health problems and dependence (Fischer, et al. 2017). Recognizing that there are risks associated with high potency products, we agree that limiting the amount of THC-content in new classes of cannabis products is critical. The Canadian Task Force on Cannabis Legalization and Regulation acknowledged that there is insufficient evidence to identify a "safe" potency limit. As such, future changes to legislation may be warranted as further research and evidence becomes apparent on what is best for the public's health and safety.

The proposed limit for edible cannabis products (i.e. 10 mg THC per discrete unit and per package) is reasonable and aligns with edible cannabis products currently available for sale in Colorado and Washington (State of Colorado, 2018; Orenstein & Glantz, 2018). We are in support of Health Canada's proposed total package size limit of 10mg THC for cannabis edibles as it is a more conservative limit than Colorado places at 100mg per package, or Alaska at 50 mg per package (State of Colorado, 2018; State of Alaska, 2018); however, to further prevent potential overconsumption and encourage Canadians to consume cannabis responsibly by design, we recommend a mandatory requirement that multiple lower potency options (e.g. under 5mg THC) are made available on the market. This would allow novice users to select a lower potency option and follow Canada's Lower Risk Cannabis Use Guidelines. Other jurisdictions such as Alaska and Oregon have individual serving size, discrete unit and package size starting at 5mg THC (State of Alaska, 2018; Oregon Liquor Control Commission, 2016). If the serving size exceeds 5mg THC per serving of edible cannabis, we recommend that there should be a requirement to include a warning on the label, to advise first time/novice users that the THC quantity contained in one serving may be in excess of their individual tolerance. Further, we recommend that Health Canada clearly define what is meant by a "small amount" in the Consumer Information advice to "Start Low and Go Slow".

The rationale for the 1000 mg limit of THC for cannabis extracts and cannabis topicals was not made apparent in the background document. To prevent overconsumption and reduce the risk to children and others who unintentionally ingest these products, Canada should place greater restriction on the maximum total THC allowed in a container of cannabis extracts or topicals than the currently proposed 1000mg. While California limits non-edible cannabis products such as topicals and concentrates to 1000mg THC per package, Washington State has restricted capsules, tablets, tinctures, transdermal patches, and suppositories to a maximum of 500 mg THC per package (Orenstein & Glantz, 2018). In Colorado, the total amount of THC allowed in a container with multiple servings as a tincture, capsule, or other ingestible product is 100mg (State of Colorado Department of Revenue, 2018). Similarly, Oregon has set a maximum container or package size of 100mg THC for capsules (Oregon Liquor Control Commission, 2016), and Alaska has set a maximum package content for THC of 50mg for cannabis products which are to be eaten or swallowed (State of Alaska, 2018).

Setting a maximum container size of 50-100mg THC for extracts and topicals would offer a significant improvement for consumer safety as compared to the proposed 1000mg THC per multi-serve container.

In terms of the potential variability for the doses of THC in edible cannabis, we recommend the variability should be no more than +/- 10%, applicable for edible cannabis and cannabis extracts, regardless of the dosage amount in one serving. This is in alignment with the current acceptable dosage for medicinal ingredients in Canada's Food and Drug Regulations (C.01.062 (1)) which is not less than 90% or more than 110% of the amount of the medicinal ingredient shown on the label.

2. Do you think the proposed new rules addressing the types of ingredients and additives that could be used in edible cannabis, cannabis extracts, and cannabis topicals appropriately address public health and safety risks while enabling sufficient product diversity?

Cannabis Edibles (Solid and Beverage):

Consumption of edible cannabis products has become a popular route of administration in states that have legalized cannabis. From a health perspective, eating or drinking cannabis products may be preferred to smoking cannabis given that ingestion has, to-date, not been associated with the same negative health impacts on lung function or cancer risk (Barrus, 2016). However, cannabis-infused edibles pose their own set of risks, including unintended consumption, inconsistency in potency and effect, and delayed onset of intoxication (Barrus, 2016). Studies from California further suggest that cannabis-infused edibles may be particularly popular among young users (Orenstein et al, 2018), a group who has been shown to be especially vulnerable to the social and psychological harms associated with cannabis use (Fischer et al., 2011). In this context, and given the limited scope of evidence currently available, it is important that a precautionary approach be taken to the regulation of these products.

We support Health Canada's proposal to prohibit added alcohol in cannabis edibles and believe that it is crucial for this restriction to remain in place. We also support the proposed prohibition on added vitamin and minerals for these products to ensure consistent public health messaging regarding the risks and harms of cannabis products and limit opportunities for conflating the health benefits of vitamins and minerals with the consumption of cannabis edibles.

In order to strengthen these regulations we would recommend that both nicotine and caffeine be prohibited as additives to cannabis edibles, allowing for a restricted amount of caffeine if it is naturally occurring in some ingredients. The current proposed limit of 30mg of naturally occurring caffeine per serving is conservative and in line with a public health approach. The recommendations to prohibit nicotine as an additive in all forms of manufactured cannabis products, and prohibiting caffeine as an additive (with allowances only for a maximum amount of caffeine if it naturally occurs in some food products such as chocolate and tea), are in line with those put forward by Orenstein et al. in their summary review of cannabis regulation in California (Orenstein et al, 2018).

Additionally, we recommend Health Canada consider restricting the daily values (DV) of fat, sugar, and salt contained in a single cannabis edible package to under 5%. This is in line with the World Health Organization (2015), the Heart and Stroke Foundation (n.d.), and Diabetes Canada (2016), all of which recommend restricting total free sugar intake to less than 10% of an individual's daily calories, and ideally less than 5%. It is further in line with the Dietitians of Canada's interpretation of under 5% DV as 'a little' of the nutrient (unlockfood.ca, 2019).

Cannabis Extracts (Ingested, Inhaled, Concentrated THC):

Research has shown that flavoured tobacco products are more appealing to young people (Carpenter et al., 2005) and that e-cigarette use is often initiated through flavoured products (Ambrose et al. 2015). Research has further shown that cannabis extracts and concentrates may resemble food (Abda-Santos, 2013) or market on food-like flavors (Goncus, 2016) and also pose a risk for unintentional ingestion (Orenstein et al, 2018).

We support Health Canada’s proposal to prohibit the use of sugars, colours, or sweeteners, as well as nicotine or caffeine in cannabis extract products.

With respect to extracts, it is imperative that Health Canada clearly defines what is meant by “appealing to youth.” We recommend that all considerations included in vaping and tobacco regulations be included in edible cannabis requirements with respect to ensuring these products and their flavourings are not considered “appealing to youth.” We recommend they not contain any flavouring that might make the product more appealing to youth, for example, if the product is a fruit-, dessert- or candy-type product. Given the possible appeal and risk of unintentional ingestion we would further recommend a prohibition on adding characterizing flavours (e.g. menthol) to these products. This recommendation is in line with those put forward by Orenstein et al in their summary review of cannabis regulations in California.

3. Do you think that proposed rules for other classes of cannabis will accommodate a variety of oil-based products for various intended uses, even though cannabis oil would no longer be a distinct class of cannabis?

Based on the definition and intent for use, the proposed new class of cannabis, ‘cannabis extracts’, sufficiently captures and accommodates a variety of oil-based products for various intended uses.

In addition, based on public health best practices from tobacco control, we recommend that cannabis regulations also incorporate a comprehensive ban on flavours and addictive additives and strict limits on the potency of all cannabis extracts and topicals (Orenstein, Stanton & Glantz, 2018), just as potency regulations were proposed for cannabis edible food, beverage and ingestible extracts.

Due to the risk of accidental or over consumption of edibles (Canadian Centre on Substance Abuse, 2015), we strongly urge Health Canada to acquire best practice evidence and address this issue.

Further we commend the federal government for its proposed regulation to include:

- Plain, child-resistant packaging
- No cosmetic, health or dietary claims; and must not be appealing to kids
- Caffeine limits (naturally occurring, under a threshold) and restrictions; no added vitamins, minerals or alcohol in edible cannabis and ingested cannabis extract; and no nicotine, sugars, colours or sweeteners in cannabis extract

4. What do you think about the proposed six-month transition period for cannabis oil? Is a six-month transition period sufficient?

The proposed six-month transition period for cannabis oil is sufficient. A stop should be put on the manufacture of new stock and labels for the ‘cannabis oil’ class on October 17, 2019, a notice of this stop approximately 1-2 months prior.

5. What do you think about the proposed new rules for the packing and labelling of the new classes of cannabis products?

Edibles, Extracts, Topicals:

Packaging is an important marketing element. Companies use packaging to advertise their products and target them to specific demographic groups. Research suggests that plain packs of tobacco are viewed as less attractive than branded packs and are perceived as lower quality products, and even influences the perception of taste.

With a few additions, the proposed regulations for packaging and labelling could be strengthened. Here are our recommendations as to how that could be achieved.

- All classes of cannabis include a message from Canada's Lower-Risk Cannabis Use Guidelines in addition to Health Canada's cannabis health warning messages currently proposed.
- A warning on all dried cannabis, edibles, extracts and concentrates stating, "do not combine with alcohol or other drugs" be added as mandatory. Given the increase risk of harms when cannabis and alcohol are combined, it is critical the public is aware of this message.
- A warning on all edible products that contain ingredients that may enhance the absorption of THC in some way.
- Commit to updating health labelling for cannabis products as new and effective practices are discovered. Regularly updating the content and style will help ensure health warnings are noticeable, memorable and engaging
- Mandatory information such as health warnings, THC and CBD content, and the cannabis symbol be on the immediate packaging (the actual product) as well as packaging that may be exterior to the immediate packaging. For example, this standard of practice is used in tobacco where cigarette cartons abide by the mandatory health warning label regulations.
- The current approach of tobacco labeling be adopted in the cannabis regulations; that health warnings cover at least 75% of the two largest sides of the package or primary display areas. This does not have to be limited to just the health warning, but could include all mandatory information in the style, size and format which is outlined in the proposed regulations.
- Include standard packaging to the regulations to curb the marketing potential of products to certain demographics. Product packaging be standardized to consist of rectangular or square shape cardboard with all sides meeting at right angles, while prohibiting specialty packaging that would target specific demographics. This would limit specialty targeting as well as limit environmentally unfriendly packaging. This recommendation applies to immediate packaging when possible as well as external packaging to the immediate container when the product is packaged within another box, for example, a tube of cream may be packaged inside a box for display purposes.
- Prohibit packaging which directly targets a specific demographic, including youth but not limited to youth, for example mothers and seniors.
- Packaging should include information on the expected effects, how long that effect may last for, safe disposal and poison control. For example, edibles should have an additional warning that states the delayed onset of psychoactive response and the estimated amount of time before effect may be felt and how long the effect is expected to last. Further, messaging should warn consumers not to consume additional doses within a one-hour time frame as it can take up to one hour, and in some cases even longer, for the effects of a THC dose to be felt.. This would help to reduce the risk of over consumption and accidental consumption.

- Mandate all products to have a “keep out of reach of children” label clearly displayed on the packaging in an effort to protect children and highlight the risk of the potential for child poisoning.

6. With respect to edible cannabis, what do you think about the requirements for all products to be labelled with cannabis-specific nutrition facts table?

OPHA recommends mandatory information for edible cannabis include a list of ingredients, common name of product, indication of source of allergen, gluten, or sulphites that have been added, durable life date only on ALL products that deteriorate in 90 days or less, and a cannabis-specific nutrition facts table. There should be NO nutrient and/or health claims on these labels.

OPHA also recommends the inclusion of the % Daily Value footnote, to improve the ease consumers to interpret food labels. According to the newly published Canada’s Dietary Guidelines, food labels help make the healthy choice the easier choice. The increased ability to interpret a % Daily Value, especially when it comes to ingredients that should be limited, is a necessary component of all food labels, including cannabis edible products. It is further recommended that mandatory front-of-package food labels for foods high in saturated fat, sugars, and/or sodium also be a requirement for all cannabis edible products. This is to ensure that Canadians can be quickly informed when making a purchasing decision.

With respect to the cannabis-specific Nutrition Facts Table (NFT), OPHA supports the requirement of a cannabis-specific nutrition facts table (NFT) for all cannabis edible products, as Oregon continues to require. We strongly recommend the font size, font type, leading, and spacing of the NFT be completely consistent with the existing labelling requirements specified in the Canadian Food and Drug Act for pre-packaged foods (i.e., as per changes to the NFT specified in 2016). Edible cannabis is a type of food and as such, the NFT should be a standardized label on all edible cannabis foods. It will be confusing to the consumer if there are different types of labels for different food products. This product information of active ingredients and warnings must be easy to locate on each package, and follow a unified, consistent format that Canadian consumers are familiar with and can understand. It is also recommended that both caffeine content as well as THC and CBD content be displayed as part of the core list of declarations such that the consumer can make an informed decision with ease.

OPHA also supports prohibiting any health claims to the consumer for all products (i.e. increases appetite, helps you sleep, increases energy) and nutrient claims (i.e. high fibre, low fat, low calorie, good source of calcium) which may entice the consumer and affect their decision-making.

7. What do you think about the proposal for the labelling of small containers and the option to display certain information on a peel-back or accordion panel?

OPHA supports labeling small containers with the option for extended panels. This proposed regulation should be strengthened with the addition of the mandatory information (THC and CBD content, cannabis symbol and health warning) on the extended panel as well as the container itself. This would increase visibility of the messaging, while the consumer is reviewing other product information.

8. What do you think about the proposal that the standardized cannabis symbol would be required on vaping devices, vaping cartridges, and wrappers?

OPHA supports the standardized cannabis symbol on all vaping devices, products, accessories, packaging and wrappings. The proposed regulation should be strengthened to include health warnings, and THC and CBD concentration on all vaping devices, products, accessories, packaging and wrappings. We also recommend that

the standardized cannabis symbol should be visible on all products that contain cannabis even if the amount in the product is below 10 mcg/gram.

9. Do you think the proposed new good production practices, such as the requirement to have a Preventive Control Plan, appropriately address the risks associated with the production of cannabis, including the risk of product contamination and cross-contamination?

The proposed new regulations appear to be consistent with standard food production safety measures.

The proposed amendment that the Quality Assurance Person (QAP) be required to proactively conduct an investigation any time they suspect that cannabis or an ingredient may present a risk to human health or does not meet requirements will help enforce good production practices and prevent risk to human health.

The requirement that the production of edible cannabis be done in a building separate from conventional food products is an important requirement to prevent cross-contamination.

Since the legal production of many of these new classes of cannabis products is brand new to both the licenced processing facilities and whomever is deemed to enforce Health Canada's national compliance and enforcement approach, we recommend additional inspections, mandatory and standardized preventative education, and progressive measures for non-compliance be implemented for the first 6-months that the regulations come into effect in an effort to proactively mitigate risk. We also recommend that the enforcement agency that is responsible for ensuring compliance with the regulations have sufficient staff, from the onset, to support the licenced processors before and after implementation.

We request clarity as it pertains to protocols in the event of a recall. After the two-year record retention period presented in Section 88.94(3), and following the one-year retention of sample after last batch sold outlined in Section 92(2), there is a concern that affected recalled products may no longer have a means of tracking.

10. What do you think about the requirement about the production of edible cannabis could not occur in a building where conventional food is produced?

The proposed requirements for the separation of buildings producing edible cannabis and conventional food appear to be aligned with Health Canada's aim to reduce the risk of unintentional consumption. While production of edible cannabis in separate buildings from conventional food production may be effective in reducing the risk of cross-contamination and unintentional consumption, we recommend the following measures to further mitigate these risks:

- Completely separate cannabis-only sites (conventional food would not be permitted to be produced or packaged on or shipped from these sites), and
- Shipping procedures for edible cannabis that are completely separate from conventional foods.

Additionally, the regulations should specify that all edible cannabis products can only be sold in its original package and not outside of its approved packaging in places where they are sold.

11. What do you think about the overall regulatory proposal?

No comment.

12. Are there any additional comments you would like to share on proposed regulations for the new classes of cannabis?

Reducing product appeal to young persons:

Under the *Cannabis Act*, “it is prohibited to sell cannabis or a cannabis accessory that has an appearance, shape or other sensory attribute or a function that there are reasonable grounds to believe could be appealing to young persons,” (Government of Canada, 2018). We support the proposed regulations for edibles, extracts, and topicals which state that products cannot be appealing to young persons. OPHA strongly recommends Health Canada include strict regulations related to advertising on television, radio, social media, the internet, and other media sources.

The Federal Government should provide explicit definitions in the regulations for manufacturers which clearly identify prohibited elements of products which may be appealing to youth.

Prohibitions should follow the *Task Force on Cannabis Legalization and Regulation’s recommendation* to “prohibit any product deemed to be appealing to children, including products that resemble or mimic familiar food items” (2016). For example, as of April 2019, Washington State will be explicitly prohibiting certain cannabis edible products, including hard candies, tarts, fruit chews, colourful chocolates, jellies, cotton candy, and other products that are especially appealing to young children. Cookies cannot contain any sprinkles or frosting and mints must not be coloured anything other than white. These recommendations are based in part on the research identified by Washington State Liquor and Cannabis Control Board (2018). In order to prevent unintentional ingestion of cannabis by children and adults alike, the Federal Government should also consider a ban on such products, as well as other confection and snack foods such as soft candies, brownies, chocolate bars, muffins, cakes and cookies. Alternatively, prohibiting characteristics of these edible products so that they are not appealing to children and youth, as Washington State has done, would be a positive step.

In addition, the Federal Government needs to consider key factors that influence children’s food choices. There is research to support that certain factors can influence children’s decisions to consume food and beverages. These factors include:

- **Colour** - children prefer foods that are red, orange, yellow or green.
- **Shapes** - children are more attracted to novel shapes such as animals, stars, etc., over plain shapes such as circles or squares. Colorado has banned edibles in the shape of fruit, animals or humans.
- **Odours** – children are more attracted to sweet, fruity and candy-like odours.

(University of Washington School of Law, 2016; (Colorado General Assembly, 2016).

To make the regulations easy to follow for manufacturers, it is recommended that Health Canada provide a list of examples to cannabis edible manufacturers with regards to prohibitions on the appearance, shape, or other attribute or function that could be appealing to young persons.

13. Are there any additional comments you would like to share regarding the legalization and strict regulation of cannabis in Canada?

Public Education

The Federal Government should continue to educate Canadians and enhance awareness of the health risks associated with cannabis, especially among priority populations such as pregnant and breastfeeding women,

young adults aged 18-25, and individuals at risk of or living with a substance use disorder or mental illness. In addition to proper and safe storage of edible products, Canadians should be informed of the unique risks associated with the delayed onset of effects of edibles, extracts, and topicals which may cause overconsumption. Individuals need to be warned that the use of such products may cause stronger and longer-lasting effects than comparable doses of smoked cannabis (Barrus et al., 2017).

As well, public education initiatives should focus on key cannabis legislation, *and Canada's Lower-Risk Cannabis Use Guidelines*. In a focus group study in Colorado and Washington State, participants suggested that education in a variety of formats, such as web and video-based education, would be useful in informing consumers about the possible risks of edibles (Kosa, Giombi, Rains, & Cates, 2017).

Places of Use

To reduce public health risks of consumption of edibles, the Federal Government should consider a ban on the sampling and ingesting of cannabis edible products in a retail storefront or in specialty consumption cafes or lounges. This will encourage individuals to use these products in the home, reducing the risk of impaired driving, public intoxication, and the co-use of cannabis edibles in public with other substances such as alcohol.

Retail Spaces:

As it will be the provincial and territorial responsibility for distribution and retail sale of cannabis, we recommend that Health Canada advocate for provinces to restrict the sale of edibles to standalone, specialty stores, and not co-located in a premise with other substances or non-cannabis products, nor sold alongside any other product or substance (i.e. edible products, extracts and topicals that do NOT contain cannabis, alcohol, tobacco, etc.). Having a restriction on selling cannabis alongside other products will reduce the risk of co-use of alcohol and cannabis for instance, as well as reduce the risk of consumers in unintentionally purchasing or consuming products that contain cannabis. Maintaining that cannabis products be sold only in standalone specialty stores will also make it easier to restrict access and exposure to minors.

Cannabis Production and Manufacturing Facilities:

Discussion should occur with the Ministry of Labour for current health and safety practices of the growing, manufacturing and producing of cannabis products to assess and mitigate any risk to the health and safety of the worker. For example, UV exposure and indoor air quality issues should have to follow standard workplace health and safety regulations.

Environmental Impact:

Plastic poses a serious threat to not only the environment but to human health (Rustagi, Pradhan, & Singh, 2011). With smaller package sizes comes an increase in the amount of plastic being consumed. We recommend that all packaging be recyclable to limit single-use plastics.

Research and Evaluation:

We emphasize the need for investing in baseline surveillance systems and research, and the importance of a comprehensive policy monitoring and evaluation framework. Ensure mechanisms to share data across sectors and levels of government are established, and appropriate indicators are chosen to monitor the impacts on communities.

More about the Ontario Public Health Association

We are a member-based charity that has been advancing the public health agenda since 1949. OPHA provides leadership on issues affecting the public's health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including promoting public dialogue and education on healthy public policy, capacity building, research and knowledge exchange. Our membership brings together many different disciplines and sectors working together to achieve our shared vision of optimal health for all.

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The recommendations in this paper are drawn from: Cannabis Regulations (New Classes of Cannabis) and the Proposed Order amending Schedule 3 and 4 to the Cannabis Act, a sub-group the Ontario Public Health Collaboration on Cannabis and endorsed by the following Public Health Units: Durham Region Health Department, Eastern Ontario Health Unit, Grey Bruce Health Unit Haldimand-Norfolk Health Unit, Hastings Prince Edward Public Health, Huron County Health Unit, Lambton Public Health, Middlesex London Health Unit, Niagara Region, Northwestern Health Unit, Perth District Health Unit, Peterborough Public Health, Public Health Sudbury & Districts, Southwestern Public Health, Thunder Bay District Health Unit, Wellington-Dufferin-Guelph Public Health, Windsor-Essex County Health Unit, York Region Public Health.