

May 24, 2023

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Via email - cannabis.consultation@canada.ca

RE: Consultation: Consultation on Potential Amendments to the Cannabis Regulations

John Clare,

As the City of Ottawa's Medical Officer of Health, I welcome the opportunity to provide feedback regarding potential amendments to the Cannabis Regulations.

I would like to acknowledge Health Canada for recognizing the importance of clear, evidence-based regulations and developing a legislative framework that aims to protect the health and safety of Canadians.

Cannabis, in particular products that have high levels of tetrahydrocannabinol (THC), can cause negative health and social impacts. Through a public health approach to reviewing and amending the Cannabis Regulations, the costs associated with the negative impacts of cannabis use can be mitigated.

Accordingly, I am pleased to submit recommendations that would further protect young people and others from the potential harms related to cannabis use, while still ensuring access to regulated sources of cannabis product remains.

Sincerely,

Ottawa Public Health submission to the Government of Canada in response to the Consultation on potential amendments to the Cannabis Regulations

Questions	Responses
Licensing	
<p>Are there any activities with cannabis that organizations should be able to carry out, without the need to hold a license or permit (for example, the possession of small amounts of licit cannabis for the purpose of laboratory research)? What measures, including regulatory requirements, should apply to mitigate public health and public safety risks?</p>	<p>Recommendations:</p> <p>In terms of regulatory requirements, implement consistency between the various smoke free regulations across Canada, i.e. in Ontario the Smoke Free Ontario Act (SFOA) and the Federal Cannabis Act in relationship to vape display and flavor requirements, implementing the stronger of the 2 restrictions.</p> <p>Implement a requirement for a formalized 2-way process between different levels of government, for example municipalities and provincial regulators, to strengthen surveillance systems pertaining to cannabis-related infractions.</p> <p>Provide recommendations for maximum density for locations of retail store front sites where cannabis is sold and explore mechanisms to implement limits in collaboration with provincial jurisdictions.</p> <p>Justification:</p> <p>In Ontario, all cannabis retailers are required to obtain licensing to operate cannabis stores from the Alcohol and Gaming Commission of Ontario (AGCO). AGCO holds the mandate to inspect and report provincially whereas municipal By-law officers inspect and enforce the Smoke Free Ontario Act (SFOA), 2017. Municipal By-law officers report any issues that they receive to AGCO, however there is a lack of a formalized process for reporting and sharing of information between municipal SFOA and provincial cannabis regulators.</p>

Cannabis retail requirements fall under the relevant provincial legislation, including the Cannabis Control Act and the Cannabis License Act regulations. In addition, they may be subject to federal requirements pursuant to the Cannabis Act.

To date there are approximately over 118 cannabis store front locations in Ottawa. Although there is a need to create accessibility to regulated sources of cannabis products, there is also a need to consider density of storefront locations. Currently, there are no restrictions on density, and drawing upon recommendations for alcohol sales, that have been declared effective for reducing alcohol related harms, e.g. “ to reduce physical access to alcohol by reducing numbers of outlets or limiting hours and days of sale”¹ cannabis store locations need to be considered.

To open a retail store and sell recreational cannabis, the following licenses and an authorization are required from the AGCO. These licences are:

- Retail Operator Licence
- Retail Store Authorization
- Cannabis Retail Manager License

The City of Ottawa opted-in to the provincial system, thus may not create a licensing system respecting the sale of cannabis nor pass a bylaw that distinguishes land or building use for cannabis from any other kinds of use.

In relationship to advertising and promotion, under the Cannabis License Act, 2018 (CLA) and Regulation 468/18, the Registrar has the authority to establish standards and requirements with respect to a number of areas, including advertising and promotional activities. In addition, cannabis retail store operators are subject to the federal Cannabis Act and its regulations, which outline permissible and prohibited advertising and promotional activities.

July 1, 2020, amendments to the Smoke Free Ontario Act exempt cannabis retail stores from the ban on the display of vapour products and clarify that cannabis retail stores may

sell flavoured cannabis vape products.² Thus, there are discrepancies between what is permissible under the SFOA versus the Cannabis License Act. Furthermore, the inspection of cannabis retail stores is under the jurisdiction of the AGCO, and specialty vape shops under SFOA.³

It is understood that regulating legal cannabis markets with improved public health as the main objective is a complex undertaking spanning production, distribution (supply), and consumption (possession and use). Thus, utilizing all available strategies to reduce harm with effective controls on availability (e.g. retail location density, hours of sale), accessibility (e.g. minimum age requirements, price levels), marketing/promotional means (e.g. use of social media platforms), ensuring that all tobacco, vapour products and cannabis retailers follow the set regulations, as well as targeted education and health promotion that sensitize the public to harms and risks will help in protecting public health.

Production requirements for cannabis products

Are there regulatory requirements from other relevant control frameworks, such as those for food, vaping products, or cosmetics, that Health Canada should consider? Why or why not? For which classes of cannabis?

Recommendations:

Implement further restrictions on cannabis products to reduce their appeal with young people, reduce accidental ingestion by children and risks of overconsumption. Include:

- **Banning the words “candy” or “candies” or similar on packages.**
- **Banning the use of shapes, sprinkles and colours that may appeal to children (i.e. bright colours, real or fictional animals or humans, fruit).**
- **Include a required list of health warning statements, including “not for kids”.**

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 bar or cookie brands, etc.

Require all edible products be stamped, marked or imprinted with the standardized THC symbol on at least one side of the edible product. Exception for products that are impracticable to stamp, mark or imprint, for example liquids.

Prohibit the use of flavouring agents in cannabis extracts.

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.

Require safer storage messaging accompany the product at point of sale. Messaging to address ways to reduce risk of unintentional exposure of this product to children, for instance: this product can cause harm if consumed by children, store in original packaging, store out of reach of children, store in locked area.

Require lower-risk cannabis use guidelines (LRCUG) be provided to consumers who purchase cannabis-infused products by means of a website link provided on the product label.

Require information on what to do in case of accidental ingestion or overconsumption on all cannabis-infused products, similar to requirements for non-prescription drugs.

Create a centralized point of contact for poison control centres, such as a nation-wide, toll-free Poison Help Line that connects to the nearest regional poison control centre and subsequently, require cannabis-infused product labels to include this information.

Prohibit the representation of a tobacco product, (i.e. cigarettes, e-cigarettes, cigar) or a tobacco company

name or logo who manufactures tobacco products on all cannabis products.

Justification:

Unintentional cannabis poisoning in Canadian children is on the rise, mostly after legalization of cannabis edibles. In October 2018, Canada legalized the sale of dried cannabis flower to adults for non-medical use. In January 2020, the sale of edible products was approved. Some provinces, including Ontario, allowed the sale of a wide variety of edibles, whereas Quebec prohibited the sale of edibles. In a study by Dr. Daniel T. Myran (2022), it was found that during the first period of legalization, hospitalization rates for cannabis poisoning in children were 2.6 times as high as those before legalization.⁴

Currently Federal regulations do include limiting the appeal of cannabis products to youth through packaging and labelling requirements and restrictions on promotional activities.

As stated in the final report of the Task Force on Cannabis Legalization and Regulation, to protect the most vulnerable, the Federal government should prohibit any product that is deemed "appealing to children," including products that resemble or mimic familiar food items.⁵

The experience of Colorado and Washington State in legalizing cannabis has provided valuable lessons to how Canada can regulate cannabis and its related products. Following legalization, Colorado saw an increase of edible related cannabis overdoses and increased calls to regional poison control centres and emergency room visits for accidental ingestion by children.⁶ Stakeholders in Colorado expressed particular concerns about products that mimic popular brand-name snacks and candies as well as the packaging and attractiveness to youth. As such, Colorado implemented new regulations that included a limit of 10 mg of THC per dose, banned the words "candy" or "candies" on packages, required listing of health warning statements, universal THC symbol stamped on edible cannabis

products, and banned the use of shapes that may appeal to children (i.e. animals, humans, or fruit).⁷

Washington State has implemented similar restrictions to edible cannabis products, including restrictions on the shapes and colours of edibles, a required list of standard warnings on each label, universal THC stamped symbol, and “not for kids” warning symbols.⁸

Canada’s Cannabis Regulations currently do not restrict the shape, or use of sprinkles of cannabis edibles, which despite the strict packaging requirements, would make the physical appearance of cannabis edibles appealing to children and consequently vulnerable to accidental ingestion.

In addition, given the research regarding the appeal of flavoured e-cigarette products, particularly among youth, flavouring agents should be prohibited in cannabis extracts. According to a systematic review of consumer preferences, adolescents consider flavour an important factor in their decision to try e-cigarettes.⁹ Youth are more likely to initiate vaping flavoured e-cigarettes, especially fruit and sweet flavoured products.¹⁰

When cannabis is ingested, the psychoactive effects can be delayed by 30 minutes or more. This delay can result in consumers accidentally consuming more cannabis product than they intend and can have undesirable effects. Consuming large amounts of THC can lead to acute impairment that could cause injury or harm.

Following legalization, Colorado saw an increase of edible related cannabis overdoses and increased calls to regional poison control centres and emergency room visits for accidental cannabis ingestion by children.¹¹ This was predominantly due to poor packaging and labelling.¹² In case of accidental ingestion or overconsumption, it is important that consumers know where they should turn to for help.

	<p>Colorado implemented new regulations following their experience with edibles and cannabis extracts. The new regulations require health statements, including a statement about the delayed effects on products intended for oral consumption.¹³ In addition, Colorado requires all cannabis labels to have a warning statement about the physical and mental health risk of cannabis use, risks for women who are pregnant or breastfeeding and the impaired ability to drive or operate machinery.¹⁴</p> <p>Washington State has implemented similar regulations requiring warning statements on all cannabis products. Required warning statements include: risk of addiction; illegal to operate a motor vehicle while impaired; effects may be delayed by two or more hours; and two universal cannabis symbols (a universal THC and “not for kids” symbol). The “not for kids” universal symbol includes a toll-free number to the National Poison Help Line that connects the caller to their regional poison control centre.¹⁵</p> <p>Lessons learned from tobacco (health warnings help inform consumers of the health risks associated with consumption). The recommendations also align with current tobacco regulations that prohibit products that are appealing to youth.¹⁶</p> <p>Furthermore, prohibit the representation of a tobacco product, (i.e. cigarettes, e-cigarettes, cigar) or a tobacco company name or logo who manufactures tobacco products on all cannabis products. This recommendation is based on the Cannabis Low-Risk Use Guidelines (i.e. regular inhalation of combusted cannabis adversely affects respiratory health outcome) and research that demonstrates that tobacco has well-known harmful health effects and contains nicotine, which is highly addictive.¹⁷</p>
<p>Should the limits on the maximum quantity of delta-9-THC that can be contained in a cannabis product (by container and ingestible unit)</p>	<p>Recommendation:</p> <p>It is recommended that the limits on the maximum quantity of delta-9-THC that can be contained in a</p>

<p>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?</p>	<p>cannabis product apply to the sum total of all intoxicating cannabinoids found in the product.</p> <p>Justification:</p> <p>There are more than 100 compounds (or cannabinoids) in the cannabis plant¹⁸ and it is important to understand the effects of the others. Presenting the total intoxicating content on a label informs the consumer of the potency of a cannabis product. It also helps prevent the potential for interactions between cannabis and other substances (drugs).</p> <p>Higher potency cannabis products have been associated with increased risk of harms, including psychosis and cannabis use disorder.¹⁹</p>
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Packaging and labelling requirements for cannabis products

<p>Should Health Canada consider amending packaging requirements for dried and fresh cannabis?</p>	<p>Recommendations:</p> <p>It is recommended that Health Canada consider amending packaging requirements for dried and fresh cannabis to:</p> <p>Establish a standard THC unit or dose (e.g., 2.5mg) and have this present across the range of cannabis products.²⁰</p> <p>Expand requirements for plain packaging and labeling to include restrictions on shapes and sprinkles, as mentioned above.</p> <p>Require safer storage messaging on packaging, for instance: this product can cause harm if consumed by children, store in original packaging, store out of reach of children and preferably in a locked area.</p> <p>Require labels for all cannabis-infused products intended for ingestion to include a health statement about the delayed onset of impairing effects and</p>
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information on accidental ingestion or overconsumption.

Impose a table format for the product information and health warnings for all cannabis-infused products, similar to the Drug Facts Table.

Include graphic health warnings, similar to cigarette packages.

It is also recommended that Health Canada apply the current and recommended requirements to all cannabis products, including products that can be vaped.

Justification:

These measures aim to reduce the risks of accidental consumption and overconsumption as well as reduce the appeal of cannabis products to young persons, while providing consumers with the information they need to make an informed decision before using cannabis.

Establish a standard THC unit:

A dose of 2.5 mg of THC is sufficient to produce psychoactive effects for some individuals.²¹

Ongoing research by CCSA indicates that older adults are interested in seeing information about recommended dosage on cannabis products.²²

A standard THC unit can play an important role in consumer education and communicating lower-risk cannabis use.²³

It could also be helpful in the monitoring and surveillance of cannabis consumption and related harms.²⁴

Restrictions on shapes and sprinkles:

Research on cannabis shows that plain packaging and health warnings reduces brand appeal and increases health knowledge among youth and young adults.²⁵

Brand imagery on cannabis packaging can promote lifestyle associations and increase the appeal of cannabis products.²⁶

Plain packaging and health warnings on tobacco products reduces product appeal and increases awareness of tobacco-related harms.²⁷

Plain packaging and health warnings are also effective at decreasing smoking rates, decreasing smoking initiation and increasing attempts to quit.²⁸

Safer Storage Messaging:

Unintentional cannabis poisoning in Canadian children is on the rise, mostly after legalization of cannabis edibles. In October 2018, Canada legalized the sale of dried cannabis flower to adults for non-medical use. In January 2020, the sale of edible products was approved. Some provinces, including Ontario, allowed the sale of a wide variety of edibles, whereas Quebec prohibited the sale of edibles. In a study by Dr. Daniel T. Myran (2022), it was found that during the first period of legalization, hospitalization rates for cannabis poisoning in children were 2.6 times as high as those before legalization.²⁹

During the second period of legalization, hospitalization rates in provinces that allowed the sale of edibles was 7.5 times as high as before legalization, whereas the hospitalization rate in Quebec was 3.0 times as high as before legalization.³⁰

Data from this study indicates that legalization was associated with marked increases in hospitalizations for cannabis poisoning in children, and most significantly with the legalization of edible cannabis products.³¹

Table format for product information and health warnings:

This recommendation is based on changes recently introduced by Health Canada to improve the safe use of non-prescription drugs by making drug labels easier to read and understand.³²

<p>A) Are there labelling requirements that could be changed without public health or public safety impacts?</p> <p>B) What required information should remain</p> <p>C) What information could be removed? Why or why not?</p>	<p>A) Ottawa Public Health supports the current labeling requirements, as these measures aim to reduce the risks of accidental consumption and overconsumption as well as reduce the appeal of cannabis products to young persons, while providing consumers with the information they need to make an informed decisions before using cannabis.</p> <p>B) It is recommended that regulations continue to include plain packaging and labeling for all cannabis products with restrictions on logos, colours, and branding.³³ It is also recommended that cannabis products continue to be packaged in a child-resistant container and be labelled with the standardized cannabis symbol, the mandator health warning message and include product information (e.g. class of cannabis, delta-9-THC and cannabidiol [CBD] information).³⁴</p> <p>C) Removing labeling information could lead to negative impacts on public health or public safety. For example, not knowing the amount of THC in a cannabis product could lead to accidental overconsumption or cannabis poisoning.</p> <p>Please refer to response to question: “Should Health Canada consider amending packaging requirements for dried and fresh cannabis?” in the category - Packaging and labelling requirements for cannabis products - for packaging amendment recommendations for additions recommended for packaging.</p> <p>Justification:</p> <p>Package labelling aims to reduce the risks of accidental consumption and overconsumption as well as reduce the appeal of cannabis products to young persons, while providing consumers with the information they need to make an informed decision before using cannabis. There is</p>
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	evidence of harms associated with lack of information on current packaging, as above.
Do you have any suggestions to simplify the requirements to include delta-9-THC and CBD content information on product labels?	Please refer to response to question: “Should Health Canada consider amending packaging requirements for dried and fresh cannabis?” in the category - Packaging and labelling requirements for cannabis products - for packaging amendment recommendations.
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?	Please refer to response to question: “Should Health Canada consider amending packaging requirements for dried and fresh cannabis?” in the category - Packaging and labelling requirements for cannabis products - for packaging amendment recommendations.
Are there other packaging and labelling requirements that Health Canada should consider for a regulatory amendment? Why and what is the current impact of these requirements on license holders and consumers?	Please refer to response to question: “Should Health Canada consider amending packaging requirements for dried and fresh cannabis?” in the category - Packaging and labelling requirements for cannabis products - for packaging amendment recommendations.
Record keeping and reporting for cannabis licence holders	
Should Health Canada remove the requirement to provide a promotion expenditure report to Health Canada? Why or why not?	Recommendations: It is recommended that Health Canada keep the requirement to provide a promotion expenditure report to Health Canada.

	<p>It is recommended that Health Canada published the information gathered for the promotion expenditure reports.</p> <p>Justification:</p> <p>The Cannabis Act generally prohibits the promotion of cannabis, cannabis accessories and services related to cannabis, except in limited circumstances. These prohibitions support the Government's objective to protect public health and safety, including protecting young persons and others from inducements to use cannabis.³⁵ These limited circumstances are subject to a number of conditions and restrictions including that young people cannot access the promotion.³⁶</p> <p>This report allows Health Canada to be informed of any promotional expenses and activities related to cannabis, including any money spent on promotions of cannabis accessories or services related to cannabis, to ensure license holders are following promotion regulations.</p> <p>Furthermore, we recommend that this information be available to the general public. This level of transparency would enhance building trust with consumers and amongst the industry.</p>
<p>Should Health Canada remove the requirement to maintain a record of key investors? Why or why not?</p>	<p>Recommendation:</p> <p>It is recommended that Health Canada keep the requirement to maintain a record of key investors.</p> <p>Justification:</p> <p>This record allows Health Canada to protect the integrity of the strict legal framework for the cannabis industry and helps to minimize the risk of cannabis being diverted to an illicit market. It also helps reduce opportunities for organized crime to infiltrate the legal industry through financial investments.³⁷</p>

Furthermore, it would highlight any potential conflict of interests such as affiliations with Elected officials or lobbyists.

¹ Gruenewald, P., Regulating Availability: How Access to Alcohol Affects Drinking and Problems in Youth and Adults (2011), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3860569/>

² Alcohol and Gaming Commission of Ontario, Retrieved from: <https://www.agco.ca/cannabis/advertising-and-promotion#:~:text=July%20%2C%202020%20amendments%20to,sell%20flavoured%20cannabis%20vape%20products>

³ Smoke Free Ontario Act, <https://www.ontario.ca/laws/statute/17s26>

⁴ Myran DT, Cantor N, Finkelstein Y, Pugliese M, Guttman A, Jesseman R, et al.

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⁵ Wang G S, Le Lait M C, Deakyne S J, Bronstein A C, Bajaj L, Roosevelt G. Unintentional pediatric exposures to marijuana in Colorado, 2009-2015. *JAMA Pediatric*. 2016;170(9). World Health Organization. (2016). The health and social effects of nonmedical cannabis use. World Health Organization: Geneva, Switzerland. ISBN 978 92 4 151024 0

⁶ Wang G S, Le Lait M C, Deakyne S J, Bronstein A C, Bajaj L, Roosevelt G. Unintentional pediatric exposures to marijuana in Colorado, 2009-2015. *JAMA Pediatric*. 2016;170(9). World Health Organization. (2016). The health and social effects of nonmedical cannabis use. World Health Organization: Geneva, Switzerland. ISBN 978 92 4 151024 0

⁷ Code of Colorado Regulations, Secretary of State, State of Colorado. DEPARTMENT OF REVENUE, Marijuana Enforcement Division COLORADO MARIJUANA RULES 1 CCR 212-3. Retrieved from: <https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=9900>

⁸ Washington State, A Legislator's Guide to Washington's Marijuana Laws. Retrieved from: <https://leg.wa.gov/Senate/Committees/LCTA/Documents/Reports%20and%20Publications/Legislator%27s%20Guide%20to%20WA%20Marijuana%20Laws%202019.pdf>

⁹ Zare, S., Nemati, M., Zheng, Y. (2018). A systematic review of consumer preference for e-cigarette attributes Flavor, nicotine, strength, and type. *PLoS ONE* 13 (3): e0194145. <https://doi.org/10.1371/journal.pone.0194145>

¹⁰ Monte A A, Zane, R D, Heard, K J. The implications of marijuana legalization in Colorado. *JAMA Pediatric*. 2015;313(3): 241-242.

¹¹ Wang G S, Le Lait M C, Deakyne S J, Bronstein A C, Bajaj L, Roosevelt G. Unintentional pediatric exposures to marijuana in Colorado, 2009-2015. *JAMA Pediatric*. 2016;170(9). World Health Organization. (2016). The health and social effects of nonmedical cannabis use. World Health Organization: Geneva, Switzerland. ISBN 978 92 4 151024 0

¹² Monte A A, Zane, R D, Heard, K J. The implications of marijuana legalization in Colorado. *JAMA Pediatric*. 2015;313(3): 241-242.

¹³ Code of Colorado Regulations, Secretary of State, State of Colorado. DEPARTMENT OF REVENUE,

Marijuana Enforcement Division COLORADO MARIJUANA RULES 1 CCR 212-3. Retrieved from: <https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=9900>

¹⁴ Ibid

¹⁵ Washington State Legislature, Cannabis product packaging and labeling. Retrieved from: <https://apps.leg.wa.gov/wac/default.aspx?cite=314-55-105>

¹⁶ Tobacco and Vaping Products Act, Retrieved from [Tobacco and Vaping Products Act \(justice.gc.ca\)](https://www.justice.gc.ca)

¹⁷ Canada's Lower-Risk Cannabis Use Guidelines, Retrieved from [Evidence Brief ENG APR-29-19.indd \(canada.ca\)](https://www.evidencebrief.ca/Evidence_Brief_ENG_APR-29-19.indd%28canada.ca%29)

¹⁸ Centers for Disease Control and Prevention, Health Effects of Marijuana, [Health Effects of Marijuana | Health Effects | Marijuana | CDC](https://www.cdc.gov/marijuana/health-effects/)

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²¹ Health Canada. (2018). Information for health care professionals: Cannabis (marihuana, marijuana) and the cannabinoids: Dried or fresh plant and oil administration by ingestion or other means psychoactive agent. Ottawa, Ont.: Author. <https://www.canada.ca/content/dam/hcsc/documents/services/drugs-medication/cannabis/information-medicalpractitioners/information-health-care-professionals-cannabis-cannabinoids-eng.pdf>

²² Canadian Centre on Substance Use and Addiction (in press). Perceptions of cannabis among older adults in Canada. Ottawa, Ont.: Author.

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³⁰ Myran DT, Tanuseputro P, Auger N, Konikoff L, Talarico R, Finkelstein Y. Edible Cannabis Legalization and Unintentional Poisonings in Children. *New England Journal of Medicine* 2022[24];387(8):757-9. Retrieved from: <https://www.nejm.org/doi/full/10.1056/nejmc2207661>

³¹ Ibid

³² Government of Canada, Guidance Document: Questions and Answers: Plain Language Labelling Regulations for Non-prescription Drugs. Retrieved from: <https://www.canada.ca/en/health-canada/services/drugs-health-products/drug-products/applications-submissions/guidance-documents/guidance-document-questions-answers-plain-language-labelling-regulations-non-prescription-drugs-contact-lens-disinfectants.html>

³³ Government of Canada. (2022). Taking stock of progress: Cannabis legalization and regulation in Canada. Taking stock of progress: Cannabis legalization and regulation in Canada - Canada.ca

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³⁶ Ibid

³⁷ Government of Canada, Cannabis key investors: Cultivation, processing and sale for medical purposes licenses, <https://www.canada.ca/en/health-canada/services/drugs-medication/cannabis/industry-licensees-applicants/key-investors.html>