

January 19, 2018

Cannabis Submission – Health Canada

The Federal Government is to be applauded for taking a progressive approach to the legalization of cannabis. The creation of a cannabis industry with low barriers to entry for producers will create a robust market and meet the diverse needs of consumers. Additionally, a market that allows for greater participation will encourage competitive pricing and product development, which will serve to eliminate criminal activity in the new regime.

Section 2.2.2 Micro Cultivation

NICHE Canada strongly supports the allowance of micro-producers in the legal market, which will diversify the industry, encourage competition and create quality products. In section 2.2.2, the government suggest a reduction in regulatory requirements for micro producers, when compared to standard cultivators. NICHE supports this tiered approach to licensing regulations, as it will benefit small scale producers and create a more level playing field for small businesses who wish to compete in the market.

Section 3. Security Clearance

As the legal cannabis regime evolves, the government should evaluate the requirements of security clearances that may, over time consume unnecessary resources.

Section 3.2 Decision to Grant a Security Clearance

Granting security clearances to cannabis business operators who have a history of non-violent and low-risk cannabis-related offences is a fair approach to licensing. Health Canada and the Ministry of Health should focus resources on ensuring that those people with histories of organized crime and violent offences are not able to infiltrate the legal market. Section 3.2 speaks to relaxing licensing restrictions for low-risk individuals, and NICHE believes this to be a good approach. For those that pose a potential risk to the cannabis market, the Ministry can work with local law enforcement to determine whether an individual should be granted the right to work within the regime.

Section 5.

NICHE encourages government-supported development of a wide variety of cannabis products, including edibles and concentrates. The development of legal products that meet consumer demand will benefit the government's goal of eliminating the criminal element. Additionally, the production of some concentrates



can be extremely dangerous. Recognizing the consumer demand for concentrates, government regulation regarding safety precautions for both the production and the end product will support the public and health safety goals of the legal cannabis regime. Until such time as the government lifts restrictions on edibles and concentrates, these products will continue to be produced and supplied illegally.

Section 6. Packaging and Labelling

Responsible packaging that allows for individual expression and marketing strategies of cannabis producers requires a delicate balance. While ensuring that products are clearly marked with THC content and requisite safety warnings, government control of advertising in a legal market should be developed with caution. Cannabis products have a wide breadth and depth of offerings, and it could be of a disservice to customers and general market competition to restrict packaging that expresses the cannabis culture.

Section 7. Cannabis for Medical Purposes

NICHE supports the notion of maintaining and broadening access to cannabis for medical purposes. Within the legal regime, the term “health care practitioner” should be expanded to include Naturopathic doctors, Traditional Chinese Medicine practitioners, and other generally accepted medical practitioners for patients who depend on alternate medical treatment for a variety of illnesses.

Respectfully
submitted by,
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The National Institute for Cannabis Health and Education (NICHE) is a not-for-profit corporation created to support the safe transition to legalization. The goal of NICHE is to support the design and implementation of legislation, regulations and business practices that protect the health and safety of Canadians as its first priority.

Because better informed public policy and industry practices are good for everyone, NICHE focuses on sharing information and encouraging collaboration amongst all stakeholders - government, industry and not for profits. We believe this will result in better legislation, regulation and business practices and help ensure public safety is protected as we progress with the legalization of cannabis.

NICHE helps bridge knowledge gaps that exist in the following areas:

- Public Health and Safety;
- Education;
- Legislation and Regulatory reforms;
- Research and Best practice; and
- Industry standards and Accreditation.

For further information please visit our web site at www.nichecanada.com

