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

- 10 mg THC generally considered standard dose
- Proposed regulation has 10mg per package (regardless of the size of the package)
- Low risk or safe consumption limits have not been established
- 2 units of 5 mg or 1 unit of 10mg could lead to over-consumption for a new user
- Public health recommendation is to start low, go slow and to wait until user can determine effects.
- Suggest lower THC limit per unit in edible solids, beverage, and extracts to better enable controlled dosing. An experienced user can choose to take more, the unexperienced user has a clearer message to use smaller dose.

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?**

- **Yes.** New rules appropriately address public health nutritional advice regarding limiting caffeine, alcohol, sugar and sweeteners.
- Appreciate efforts to create consistency across Acts including Food & Drug regulation, Tobacco and Vaping Products Act.
- Seems like there would be many options for creating new food products, extracts and topical forms of cannabis.
- Additives/ ingredients such as sugars and sweeteners (in extracts) is imperative to protecting the public against over consumption.
- Hazardous products such as meat, poultry and fish as well as items that require refrigerated storage would increase the public health risk of the edible. Ensuring that these products would not be permitted eliminates the risks associated with cross contamination and temperature abuse.
- Added vitamins and minerals as a restriction will eliminate the idea that such products hold a nutritional element to them.
- Consider including the identifying the level of caffeine in all products

3. **Do you think that the 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?**

- Yes
  - By separating cannabis oil into other classes, there will be a better chance of the products being used for their intended purpose. Cannabis oil is quite general as it be topical, extract or used in an edible.
  - In addition to this, the term “cannabis oil” is used sparsely in the act as it is.

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

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

- Good that edible cannabis labels are consistent with FDR
- Good that previously set rules for packaging and labels will be maintained with additional requirements for new classes
- Good that there are prohibitions on representations re health benefits, nutrition claims, cosmetic benefits and associations with alcohol branding in order to decrease appeal to youth.
- Good to include requirements of metered sprays and other designs to decrease risk of accidental consumption.
- Suggestion that all cannabis products come with “directions for use”
- Consider the inclusion of the poison control number for unintended use by children
- Packaging: the new proposed requirements eliminating a certain finishing would allow for brand flexibility and would not have an impact on the public health risk of the product
- Consider including health warnings messages such as avoiding co-consumption of edible cannabis with alcohol.

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

- This supports a consumer’s ability to make informed decisions about what they are consuming, this will become increasingly needed as products become available. NFT are I understand the reasoning behind creating the NFT, however it does not seem necessary. Adding a NFT would insinuate that edibles would be considered a food item, which is contradictory to the definition of edible cannabis and to the views of Health Canada in the regulatory scenario (Health Canada would issue a notice that edible cannabis would not be treated as a “food”).
- This would also indicate whether or not the edible cannabis would contain some form of nutritional value. While statements regarding nutritional value would be prohibited, any nutritional value could be identified in the NFT.
- Ultimately it seems like an addition that would not be required.
- A familiar way to present information.

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?

- Peel-back panels will allow for smaller containers to be labelled with required information while supporting smaller amounts of product and less packaging waste.
- Concerned that information could be more easily separated from the container with accordion style panels as they may not fold back against container as easily.
- However this seems to be addressed by proposed rules for displaying the cannabis health warning and symbol of the external packaging. It is clear that the amendments are required for the labelling to ensure that the label is readable.

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

- Approve of this suggestion as it supports prevention of unintended consumption.
Concern related to normalization of cannabis if unopened or empty vaping accessories. I believe this would be a worthy requirement to be added in.

9. Do you think that 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?

- A preventative control plan is imperative in respect to public health. Since the proposed regulation outlines that food compliance inspections would not be conducted, it is essential to have some amount of food safety requirements built into the Cannabis Act to ensure that food safety could be enforced to some degree. This would Definitely aid in reducing the risk of cross contamination.
- This addition along with having this plan would be required as well as a qualified Quality Assurance specialist would supplement inspection under the SFCA.

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

- I think that this requirement will ensure the amount of cross contamination is prevented to a reasonable degree. I think that this will also aid in inspection and compliance as there would be different acts applying to edible cannabis versus conventional food items.

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

- Appears to be taking a strong public health approach to setting regulations for new classes of cannabis.
- Appears to be considering “lessons learned” in other jurisdictions where cannabis has been legalized.
- The regulatory proposal overall is conveying the importance of public health risks and methods on which to mitigate the risks involved with edible cannabis.

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

- No

13. Are there any additional comments you would like to share regarding the legalization and strict regulation of cannabis in Canada? For example, are there measures the Government could take to support individuals to be in compliance with the public possession limits for cannabis (i.e. 30 grams of dried cannabis "or equivalent")? Do you have views on how to minimize environmental concerns associated with packaging, while maintaining key aspects, such as child resistant packaging, that help to prevent accidental consumption?

- Packaging suggestions to minimize environmental concerns:
  A limit on weight of product to packaging ratio or size of external package allowed for small products; regulate the kind of materials (recyclable, bio-degradable, hemp-based) packaging allowed to be used as secondary packaging; incentives to companies creating light weight packaging that meet the cannabis requirements.
- Compliance with public possession limits:
- Public campaigns about the equivalencies and laws; make this information part of the check-out process for purchasing cannabis