



Recommendations for Health Canada: Integration of edible cannabis and cannabis extracts into The Cannabis Act.

The BCFPA's Government and Industry Relations Committee (GIRC) has commissioned a [Position Paper](#) on the Health Canada regulations surrounding cannabis edibles and beverages to be introduced to the Canadian marketplace on October 17, 2019.

This [Position Paper](#) was produced with the support of CBD Strategy Group and Brandon Wright in consultation with industry stakeholders, and we would like to thank Brandon and CBD Strategy principals Christina Michael and Jennifer Kelly Larry for their valuable input.

We encourage all BCFPA members and industry stakeholders to review our recommendations and provide feedback to amend the Health Canada Regulations on Cannabis Edibles ([Regulations accessed via link](#)).

[Shorter Summarized Version of Health Canada Proposed Regulations](#)

The BCFPA is looking for your support of these recommendations on behalf of industry, and add your voice to the submission. In order to ensure your comments and feedback are recorded, please **address your feedback to James@bcfpa.ca** (this link c.c.'s cannabis@canada.ca). You may simply state that you concur with the BCFPA's recommendations as submitted, and/or add your own feedback/comments. All feedback and support emails must be received by the **DEADLINE of February 20th, 2019.**

BCFPA Recommends the following;

1. That Health Canada draw a clear delineation in the regulations governing restrictions between edible products containing THC and those containing CBD.
2. Remove the requirement of a separate manufacturing facility for companies working with CBD rather than THC, which constrains companies intending to make edibles using CBD as a welfare product.

3. Establish a Federal health, safety, and business sustainability working group for dosing, packaging, processing, and manufacturing that meets the same standards for the biological and patient approach regarding other cannabis products, with a mandate to adapt regulatory aspects to the reality of Canada's food processors.
4. Review of Dosage Limitations. Ensure the Working Group established as per recommendation #2, identifies optimal dosage levels per unit of edible product. As one of the goals of cannabis legalization is to discourage black market activity, we believe the current dosage limitations in the draft regulations will ensure the proliferation of unregulated edible products.
5. Allow for homogenized packaged products, not single dose; which is environmentally irresponsible and cost prohibitive for with otherwise little- to no-benefit to public safety;
6. Ensure labelling specific to edible cannabis is focused on educating and protecting the consumer. Accurate and informative labelling on packages should allow the consumer to obtain clear, accurate, complete information and enable them to make an informed purchase decision;
 - a. cannabinoid contents for the entire unit,
 - b. recommended serving size,
 - c. cannabinoid content of each serving,
 - d. expected time-to-onset of effects.
7. Require all labels for cannabis edibles to declare the presence of any food allergens, as is mandatory for conventional food and beverage products.
8. Transportation, inventory and warehousing: That transportation, inventory management and storage standards be in accordance with those set by the Canadian Food Inspection Agency and that inspections be carried out by the CFIA inspectors.
9. a) Licenses & Permits: R&D permits and licenses for processing and microprocessing should be granted in 3-6 months. The current timelines for receiving licenses and permits is an unreasonable barrier to entry.

b) Cannabis Edibles Craft License: that a number of limited craft cannabis edibles production licenses be addressed and ruled by a special permit.

10. Certifications: That food processors of edible products containing cannabis have the food safety guidelines and certifications recognized by the industry;
- a. Hazard Analysis Critical Control Point (HACCP). This certification frames good manufacturing practices.
 - b. Annual Global Food Safety Initiative (GFSI) Hearing. This certification may be requested and granted depending on the product, the customer and its destination.

Respectfully Submitted :
*James Donaldson, CEO and Executive Director
BC Food Processors Association Government
and Industry Relations Committee*