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Spotlight: Edible Cannabis in Canada, Part 2 of 4

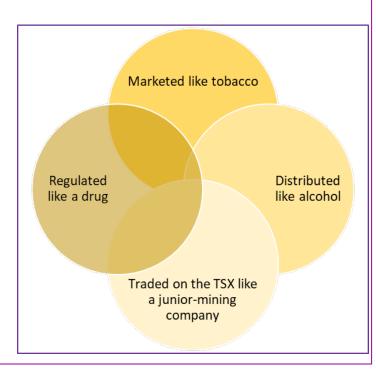
lpha Edibles in your Christmas stocking

On June 26, 2019, Canada's <u>edible cannabis</u> regulations were officially finalized and published in Canada Gazette II. The regulations come into force on October 17, 2019, enabling edible cannabis products to be marketed by December 17, 2019.

lpha Back to the future

Regulators, as human beings, tend to approach the unknown from the perspective of the known. The regulation of edible cannabis is no different. It has been observed that edible cannabis will be marketed like tobacco (plain packaging, composition standards, health warnings); regulated like a drug (strict GMP's, qualified personnel, mandatory reporting of controlledsubstances distribution and inventory, on-label medicinal ingredient content disclosure); retailed like alcohol (dedicated, licensed outlets; provincial jurisdiction); and is financed like a junior-mining company traded on the TSX. Further similarities may surface as the market unfolds. The result is analogous to the eye of the storm, where potentially conflicting forces rotate around a central point.

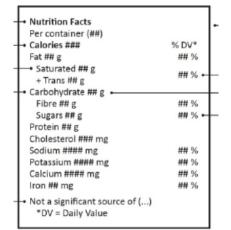
lpha Edible cannabis regulatory fusion



 \ddot{x} Label hybrid of tobacco, drug and food

The <u>tobacco-label-like</u> features include a one colour per panel surface, no metallic hues and a health warning message, including the standardized

cannabis symbol. The OTC pharmaceuticallabel-like feature is the THC and CBD content, using those specific acronyms. Anecdotal evidence indicates that CBD has an antitode effect on THC. Longterm use of specific THC:CBD ratios as well as clinical trials are required to substantiate this widelyheld belief. Mandatory food labelling requirements exert the greatest influence, including the common name of the edible cannibis (common? good luck with that one!); a List of Ingredients, including the presence of a major food allergen, source of gluten, or sulphites > 10 ppm; a best-before date for a durable life less than 90 days; and, an ediblecannabis specific NFt:



\ddot{lpha} The human factor and expectations

<u>Health Canada's research</u> indicates that food labels are Canadian shoppers' second source of product information, a step behind the Internet. In 2016, the Agency issued guidelines for <u>improved</u> <u>consumer use of OTC labels</u>. Tobacco labels are as near austere as possible. It remains to be seen if the edible cannabis label will perform as expected. **FF**

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