

Cannabis in Canada – health claims & effects: Part 3 of 4 September 2019

☀ Natural Cannabis Health Products

Canada's edible cannabis regulations prohibit cannabis health claims on the label and in all advertising and promotion activities. In contrast, the sale of a Natural Health Product (NHP) requires that an NHP bear a pre-market approved health claim, publicly registered with the NHP's Natural Product Number (NPN). In June of this year, Health Canada launched a public consultation on the concept of an NHP with CBD and/or THC as the active ingredient(s) resulting in a hybrid [Cannabis Health Product \(CHP\)](#).

☀ Claims, direct access and pooch, too

A CHP would carry a pre-market approved health claim. A CHP would differ from the three existing categories of licensed cannabis products in Canada – medicinal, recreational, and cannabis-containing prescription drugs – in that while intention of use is therapeutic (like medicinal and prescription drug) access would be unrestricted (like recreational). Specific to a CHP and unlike any other cannabis product, would be approved use by a pet owner or veterinarian in the medical treatment of animals. The chart below, modified from the CHP consultation document, compares the major marketing elements of the three existing licensed cannabis products sold in Canada, to the proposed CHP category.

☀ Caught in a highchair

Not so fast, say some healthcare professionals, as there are side effects to cannabis use. The [Canadian Dental Hygienists Association](#) provides professional development to their members to prepare for the treatment and handling of a patient who arrives at the dentist's office under the influence of cannabis. And, they have advice for consumers, too. Relaxant properties are an oft touted benefit of CBD and THC. However, a CDHA fact sheet [Impaired in the Chair?](#), written for the lay person, cites facts to the contrary and encourages consumers to disclose both habitual or episodic cannabis usage to their dental hygienist. Risks include increased anxiety due to a heightened cannabis-induced heart rate, exacerbated by anesthetics; impaired judgement and incapacity to provide consent for treatment; dry mouth, making dental treatment more uncomfortable and painful than otherwise; increased bleeding and potential delayed healing; and, altered efficacy of prescribed medication. A trade-off between optimal dental health and cannabis health claims is simmering.

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| Key Parameters | Comparison of product categories of cannabis | | |
|--|---|--|---|
| | Current regulatory regime | Current regulatory regime | Proposed regulations |
| | Non-medical and medical | Prescription drugs containing cannabis | Proposed Cannabis Health Products |
| Pertinent legislation | <i>Cannabis Act</i> | <i>Cannabis Act and the Food and Drugs Act</i> | Subject evidence-based approach of the <i>Food and Drugs Act</i> and objectives of the <i>Cannabis Act</i> |
| Health claims | CANNOT make health claims | CAN make authorized health claims based on evidence | Would make authorized health claims to treat minor ailments based on evidence |
| Ingredients | Subject to restrictions on product composition and ingredients, as set out in the <i>Cannabis Regulations</i> | Any cannabis substance and other medicinal and non-medicinal ingredients supported by evidence | Would include cannabis; could also include other medicinal and non-medicinal ingredients supported by evidence |
| Retail environment: Provincially & territorially authorized retailers | Can sell cannabis products | Available at a pharmacy with a prescription from a practitioner for use by humans or via a veterinarian with a prescription for use in animals | Would be able to sell CHPs |
| Retail environment: Federally-licensed sellers of cannabis for medical purposes | Can sell cannabis products for human use when authorized by a healthcare practitioner | | Would be able to sell CHPs for use by humans or in animals without the need for a prescription |
| Packaging and labelling requirements | Information on product contents and their health risks. Cannot appeal to youth. No pre-market review or approval. | Supports informed consumer choice and safe, effective use. Information based on pre-market review. | Would support informed consumer choice and safe, effective use. Cannot appeal to youth. Information based on pre-market review. |