



Brief Submitted to the Health Canada Consultation on the Potential Market for Cannabis Health Products that Would Not Require Practitioner Oversight

Introduction

The Canadian Centre on Substance Use and Addiction (CCSA) welcomes the opportunity to provide Health Canada with feedback on considerations related to the market for cannabis health products (CHPs) that would not require practitioner oversight. CCSA recognizes certain benefits to introducing regulations for health claims on cannabis products, including displacing the existing illegal market for CHPs, and providing quality control and safety around cannabis products for minor ailments marketed with health claims. CCSA supports a cautious approach to introducing health claims on CHPs and reinforces the need to maintain a public health-informed approach to regulation for the following reasons:

- The need to establish scientific evidence to support the safety and efficacy of cannabis-based products marketed as health products;
- The risk that marketing cannabis products as health products will lead to increased normalization of cannabis use, particularly among young people; and
- The need to ensure the regulated cannabis market for health products does not result in unintended increases in the risks and harms associated with cannabis use.

Key Considerations

Maintaining a Public Health Focus

CCSA looks at cannabis regulation from a public health perspective, which seeks to minimize harms, prevent problematic use and apply evidence. The objectives of the *Cannabis Act* reflect the federal government's commitment to public health and ensuring access to a quality-controlled supply of cannabis products. Health Canada's introduction of a regulated market for CHPs must be based on well-established scientific evidence supporting the quality and safety of these products.

The challenge of meeting market demand while restricting diversification in the market for cannabis products is particularly relevant to considering CHPs. In recent years, the market for CHPs has seen a high level of interest from consumers, leading to market expansion and a proliferation of illicit markets for products. These developments have occurred independent of evidence-based public health-informed market regulation. Taking a cautious approach to product diversification for CHPs that



focuses on ensuring products and their application are grounded in evidence would support public health objectives.

Protecting Youth

Early initiation of cannabis use is associated with negative health outcomes and greater likelihood of future problematic use (Wallingford, Konefal, Young, & Student Drug Use Surveys Working Group, 2019). Ensuring that cannabis products are not readily available to young people can act as an effective preventive measure in limiting early initiation. Conversely, increasing the availability of cannabis-based products to young people might serve to further normalize cannabis use among youth (Zuckermann, Battista, de Groh, Jiang, & Leatherdale, 2019).

The proposed parameters create a legal pathway for access to CHPs for young people. Given concerns about normalizing cannabis use and the lack of research on the safety of CHPs for young people, CCSA recommends pursuing a cautious approach to providing access to CHPs for youth. Ensuring that youth access is limited to applications based on demonstrated clinical efficacy is one way to reflect such an approach. Requiring that research specifically investigates impacts according to diversity factors such as gender and age will also be essential to ensuring appropriate access and use.

Product packaging and labelling can have a significant impact on consumer perceptions and behaviour (U.S. Department of Health and Human Services, 2012). CCSA supports an approach to the packaging and labelling of CHPs that does not appeal to young people. Alignment with provisions in the *Cannabis Act*, which impose limits on packaging and labelling that appeal to young people, as well as requiring child- and tamper- proof containers, should be followed for CHPs.

Building the Evidence Base

CCSA supports Health Canada's proposed approach to gathering further external scientific advice about necessary evidence standards for CHPs before releasing draft regulations. There has been little research and testing on the safety and efficacy of CHPs for minor ailments. This absence requires that research to support evidence-based decision making be given priority before allowing health claims to be made for cannabis-based products.

Growing interest in CHPs, especially around the potential health benefits associated with cannabidiol (CBD) products, has brought increased attention to this market, without the corresponding research to establish the safety and efficacy of CBD products. Robust and balanced scientific research should inform the establishment of standards for assessing the safety and efficacy of CHPs, therefore promoting consumer safety.

Data Collection, Monitoring, Surveillance and Evaluation

To promote public health and safety, comprehensive and ongoing data collection, monitoring, surveillance and evaluation is needed as regulations for CHPs are implemented. This collection, monitoring, surveillance and evaluation will support course corrections and regulatory adjustments as the evidence base and patterns of use emerge.

Data collection on the availability, sales and use patterns of CHPs will also help us understand the extent to which consumers are moving from illegal to regulated product sources and the resulting impact on the illegal market. Monitoring patterns of use, particularly among higher-risk groups such as youth, will inform the development of strategies promoting lower-risk use. Data collection, research and monitoring will also help to identify the benefits of use and to inform best practice applications for both consumers and health practitioners.



Conclusion

A comprehensive, public health approach to CHPs includes a commitment to:

- Evidence-informed health and safety standards to inform the development of regulations for CHPs;
- Limits on access to CHPs for young people to discourage early initiation and the normalization of cannabis use; and
- Continued monitoring and evaluation to ensure the quality and safety of products labelled as CHPs.

The creation of a regulated market provides the opportunity to ensure that adult Canadians who use CHPs have access to a product that meets stringent quality control and safety standards, while limiting inducements for cannabis use among young people. However, for these standards to protect the health of Canadians and to establish the safety and efficacy of these products, they must be grounded in a strong evidence base.

References

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