



July 4, 2024

Regulatory, Legislative and Economic Affairs Division
Strategic Policy Directorate
Controlled Substances and Cannabis Branch
Health Canada
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VIA EMAIL

RE: Canada Gazette, Part I, Volume 158, Number 23: Regulations Amending Certain Regulations Concerning Cannabis (Streamlining of Requirements)

Director General John Clare,

I write on behalf of British Columbia's Alliance of Beverage Licensees (ABLE BC)—the industry association representing BC's private cannabis retailers—to provide feedback on proposed amendments to Canada's *Cannabis Act*.

ABLE BC advocates for business-friendly policies that grow local economies, sustain diverse communities, and support responsible licensed cannabis operations. We collaborate with government partners to ensure the success of legal cannabis retailers throughout BC and to tackle the illicit supply of unregulated and potentially dangerous cannabis.

ABLE BC strongly supports many of Health Canada's proposed *Cannabis Act* amendments. The proposed changes reflect the needs of a maturing cannabis industry and evolving marketplace and will be welcomed by licensed cannabis operations.

As the representative of BC's private cannabis retailers, we consulted broadly with industry stakeholders, including our Board of Directors, our Cannabis Committee, and our membership. We respectfully submit the following perspective on a few of the proposed amendments.

1. Simplify packaging requirements (colour differentiation, cut-out windows, and transparent containers)

Allowing colour differentiation between lid and container will lead to better and more informed purchasing decisions from customers, create new opportunities for brand innovation from licensed producers, and will better support merchandising and category management from retailers.

Cut-out windows and transparent containers will help retailers inform and educate customers about various cannabis products. For example, viewing products through packaging helps customers identify and compare different products.

2. Simplify labelling (QR codes)

QR codes are the most efficient and effective way to provide in-depth product information to customers and retailers. It is the best way to ensure retailers have the most up-to-date information about a product, which enhances their ability to support customers with the right product for their needs.

3. Remove NNCPs (waiting 60 days)

This change will improve the freshness and quality of cannabis products available to customers. It will also prevent revenue loss by ensuring retailers can sell through inventory before products go stale and value degrades.

Removing the 60-day wait time also streamlines production processes and supply chain cycles.

4. Other amendments proposed by ABLE BC

While the following topics were not included in the proposed amendments, ABLE BC requests Health Canada consider for review:

- Ease the prohibition on cannabis promotions;
- Increase THC limits on edibles;
- Increase individual cannabis possession limits;
- Provide a framework for minors accompanied by a parent or guardian to enter cannabis stores;
- Change the formula for Cannabis Excise Tax to better support the financial viability of Canada's cannabis industry.

ABLE BC commends Health Canada on the proposed amendments and industry engagement process. Thank you for your time and attention to this matter. Should you have any questions, please do not hesitate to contact me at jeff@ablebc.ca or 604-499-2566.

Sincerely,



Jeff Guignard
Executive Director
ABLE BC