



MAKING *Life* BETTER

The Green Organic Dutchman Input to the Standing
Committee on Health regarding Bill C-45
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EXECUTIVE SUMMARY

Cannabis is set to become legal across the country by July 2018. As one of Canada's 52 Licensed Producers, and one of only two that provides certified organic pesticide free cannabis, The Green Organic Dutchman has a unique perspective to bring to the study of Bill C-45, the Cannabis Act and we believe this brief will provide you with a deeper understanding.

The production of organic cannabis provides Canadians with a safer, more sustainable option for cannabis use. When public health and safety are the primary concern, it is crucial that consumers are knowledgeable about how a product is made and what it contains.

The Cannabis Act addresses a wide range of important issues related to the legalization and regulation of cannabis in Canada. In studying this legislation, the House of Commons Standing Committee on Health has the opportunity to refine and inform the drafting of regulations. It is imperative that the committee take an evidence-based approach to how cannabis is packaged, labelled, and what information is presented to consumers.

Permitting organic certification will not only inform the choices Canadians make regarding cannabis, it will also encourage industry to take a more sustainable approach and to innovate in the cultivation of cleaner and healthier products.

A. About The Green Organic Dutchman

The Green Organic Dutchman is a Health Canada Licensed Producer, licensed under the *Access to Cannabis for Medical Purposes Regulations* (ACMPR). With facilities located in Ancaster, Ontario we cultivate organic medical cannabis using sustainable and craft growing techniques.

With an emphasis on environmental protection and patient health, our product is farm grown without the use of pesticides. We are committed to providing patients with premium organic product with safe and high-quality organic cannabis and as part of our commitment we are working on our ECOCERT certification, a globally recognized accreditation. Our commitment to sustainability means we have optimized operations with efficient power management solutions, while maintaining a zero-carbon footprint.

Our wholesale platform allows patients to purchase organic cannabis from a guaranteed and consistent supply of 36 strains tailored to patient needs.



OUR VISION

TGOD is committed to becoming the global leader in delivering organic cannabis solutions that enhance peoples lives.



OUR VALUES

TGOD consistently adheres to the highest levels of excellence, underpinned by world class employees.



OUR DIFFERENCE

TGOD produces farm grown, high quality, organic cannabis without the use of pesticides.

B. The Importance of Organic

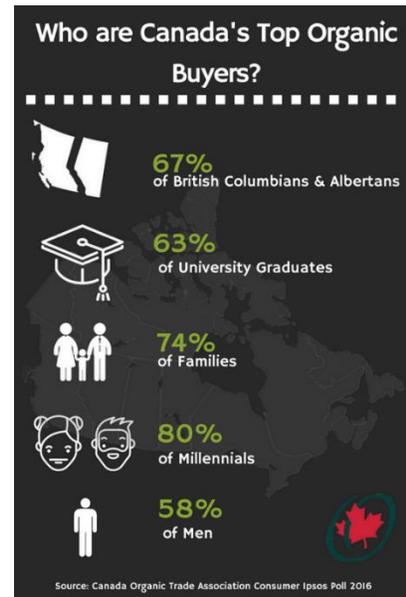
If Canadians choose to use cannabis, they deserve to know important details about the product, including whether it is organic and pesticide-free. To-date, industry has not adopted natural growing practices. Out of 52 Licensed Producers approved by Health Canada, The Green Organic Dutchman, Whistler Medical Marijuana Corp., ABCann Medicinals and OrganiGram are the only companies cultivating cannabis organically.

Canadians care about quality of products and they also care that what they consume is the safest possible alternative. This is clearly demonstrated by the number of Canadians who choose organic.

In 2016, 74% of families purchased organic products because less likely to be potentially harmful to their health. When it comes to organic products, Canadians make decisions founded in scientific evidence. This is all the more relevant in the cannabis industry, where quality control has a direct impact on consumers' health

Licensed Producers who take an all-natural, organic approach to cultivation are able to deliver a quality-controlled product that is safe for consumers and has little to no impact on the environment. Under the ACMPR there are 17 pesticides listed under the *Pesticides Act* for use on cannabis crops that may be used at any point in cannabis production. In the organic production of cannabis harmful substances such as fertilizers or pesticides are not used.

The government has taken steps to implement mandatory testing and reporting of results to Health Canada. However, this announcement came only after three recalls of medical cannabis were made related to the use of unauthorized pesticides. Once the framework is in place for recreational cannabis there will be a need for more testing, to ensure Canadians know that they are receiving safe, quality-controlled cannabis products. Organic cultivation is pesticide free, which significantly lessens the likelihood that banned substances will be detected.



C. The Cannabis Act

The Cannabis Act sets out regulations that would allow the government to put in place the regulatory framework for packaging and labelling. The act makes clear that labeling will not be permitted if it is marketed to youth or seen as outright branding to encourage consumption. This is a necessary step in the interests of public health. As per the Act and subject to the writing of regulations, labeling would be limited to factual, accurate, information about cannabis products. In addition, the Cannabis Act places a number of restrictions on the packaging and labelling of cannabis similar to the restrictions applicable to tobacco products under the *Tobacco Act*.

To minimize potential public health impacts of legalized cannabis, the Task Force recommended in its report that the federal government require plain packaging for cannabis products. This recommendation suggested that information such as company name, strain name, price, amounts of THC and CBS and warnings and other labeling requirements, should be the only material included on packaging and labelling.

In our view, adopting such a restrictive approach to labeling will not serve Canadians well. We must be mindful that many Canadians are not well-informed about cannabis, and the variety of products which will soon be available to them. And while the Task Force quite rightly points out that there are public health risks associated with use of cannabis, that risk is increased if Canadians are not well informed about the products they are purchasing. The policy objective that must be paramount when considering the packaging and labeling for cannabis is a well-informed consumer who can make an informed and educated choice about what product would be most appropriate for their needs or preferences.

For example, as we have pointed out, there is a growing preference amongst Canadians for organic products, and many Canadians may expect a disclosure indicating whether a cannabis product was grown using pesticides or organic techniques. Our position is that whether a product is grown using pesticides or organic techniques should be considered as a relevant and an important labeling requirement.

With regulations that would limit informational and brand preference under the Act, licensed producers are faced with barriers to ensuring consumers have the ability to make informed decisions. There are a number of areas, if properly addressed, could allow the government to deliver on its commitment to public health and safety, while ensuring that cannabis is kept out of the hands of children and youth. In order to guarantee regulations are developed that best reflect the evolving nature of the cannabis industry, the government must consider expanding beyond plain packaging and labelling for cannabis products to include organic certification.

D. Recommendation

We recommend that the government allow for organic certification on cannabis packaging and labelling. Including this information will provide greater education to Canadians who are unfamiliar with cannabis products. In addition, including organic certification on cannabis packaging and labelling will create an incentive for industry to pursue sustainable growing techniques.

The CFIA is responsible for oversight regarding organic products regulations in Canada. Each year, Canadians are increasingly buying more amounts of organic goods, because they recognize the lessened environmental impacts. Canadians are becoming increasingly aware about of the harm caused by heavy pesticide use and the potential health benefits that exist with consuming organic products. Not only is this true for food, but also for alcohol, where brewers, vintners and distillers are permitted to label products as organic.

The Green Organic Dutchman is calling on the government for support in ensuring that the regulations accompanying Bill C-45, the Cannabis Act do not restrict licensed producers in the labelling of products as organic. Supporting craft industry for producers reflects the government's vision for legalization and will support economic growth and job creation. Including organic packaging and labelling regulations will encourage industry to innovate, supporting competitiveness and market development in Canada's cannabis sector.

CONCLUSION

Cultivating cannabis on a commercial scale has resulted in quality-control issues and concerns regarding pesticide use and contaminants, which directly impact public safety. Our farm-grown, innovative cultivation techniques guarantee that the cannabis we produce is greener, cleaner and always of the highest quality. Through our experience in the sector, we believe it is imperative for the government to address the growing trend of organic products in its study of the Cannabis Act.

With your support, we can seize the opportunity presented by the legalization of cannabis to ensure that quality and sustainability are at the forefront of cannabis production. By including organic certification on cannabis packaging and labelling, consumers are presented with information that allows them to make informed decisions.

As the government continues to engage with stakeholders over the next year on various aspects of the proposed legislation, we hope that you will consider our value proposition. We are confident that with closer examination of the legislation, members of the House of Commons Standing Committee on Health will see The Green Organic Dutchman as a valuable partner, helping the government deliver on its commitment to public health and safety.