



Importance of ORGANIC Labelling on Cannabis Products

Executive Summary

The Green Organic Dutchman (TGOD) is a publicly traded Health Canada Licensed Producer, licensed under the Access to Cannabis for Medical Purposes Regulations (ACMPR). With facilities located in Ancaster, Ontario and Valleyfield, Quebec we cultivate organic, medical cannabis using sustainable growing techniques free of all synthetic pesticides.

TGOD remains committed to providing patients with premium organic cannabis. Our commitment to environmental protection includes our Greenhouses that are constructed to LEED standards. LEED (Leadership in Energy and Environmental Design) is an internationally recognized green building certification system, providing third-party verification that a building was designed and built using strategies aimed at improving performance across all the metrics that matter most: energy savings, water efficiency, CO₂ emissions reduction, improved indoor environmental quality, and stewardship of resources. We also utilize efficient power management solutions, while pursuing a zero-carbon footprint.

Canadians who choose to use cannabis want and deserve to know important details about the product, including whether it is organic and pesticide-free. The federal government in its publication of the Summary of Comments Received During the Public Consultation noted as much, stating that “among those who expressed support, many suggested additional information that they felt should be required to be on the label...[including] whether a product was organic or not.” 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.

The findings publicized in the Summary of Comments Received During the Public Consultation reflect the results of an online poll conducted by Hill + Knowlton Strategies between December 5-18, 2017 that surveyed 1,522 Canadians 18 years and older demonstrated that:

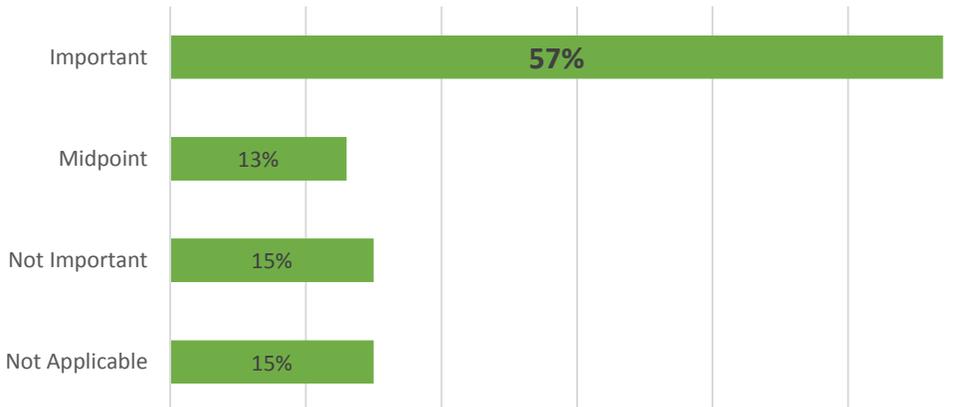


57% of Canadians indicated that if they were going to purchase cannabis to use as medicine that it would be important to them that it is grown and processed organically.

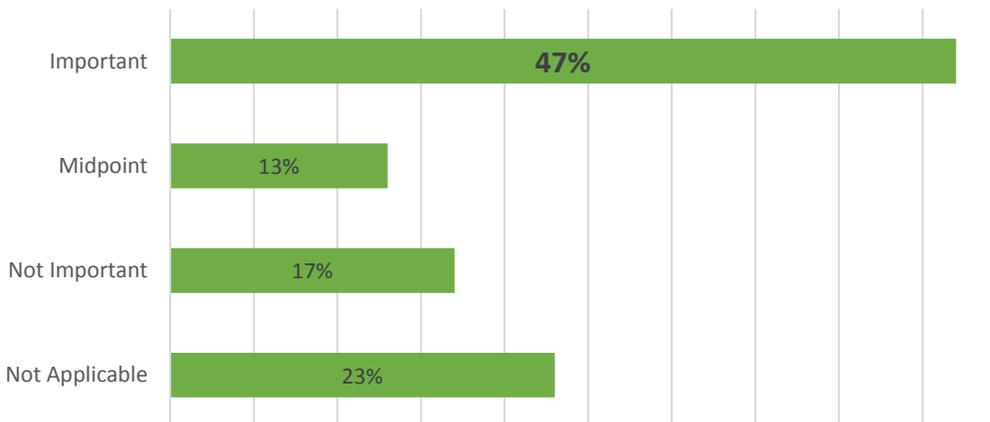
47% of Canadians indicated that if they were going to purchase cannabis for recreational use it would be important to them that it was grown and processed organically.



If you were ever to purchase cannabis to use as **medicine**, how important would it be that it is grown and processed **organically**?



If you were ever to purchase cannabis for **recreational** use, how important would it be that it is grown and processed **organically**?



Note: Hill + Knowlton Strategies conducted an online survey of Canadians between Dec. 5 – Dec. 18, 2017. In total n= 1,522 members of the general public 18 years or older (Associated margin of error for a probability sample of this size is +/- 2.5%, 19 times out of 20). Final survey data were weighted based on Census figures according to region, age and gender in Canada.



Packaging and Labelling

What do you think about the proposed rules for the packaging and labelling of cannabis products? Do you think additional information should be provided on the label?

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. To-date, industry has not adopted natural growing practices. In fact, of the 104 Licensed Producers (LPs) approved by Health Canada, only 3 companies are cultivating cannabis organically.

LPs who take an all-natural, organic approach to cultivation deliver a quality-controlled product that is safe for consumers. Under the ACMPR there are 17 pesticides listed under the Pesticides Act for use on cannabis. In the organic production of cannabis, harmful substances such as synthetic pesticides are not used. While the government has taken steps to implement mandatory testing and reporting on the safety and potency of the plants grown by LPs, once the framework is in place for non-medicinal cannabis, there will be a need for more testing to ensure Canadians know that they are receiving safe, quality-controlled cannabis products.

It is becoming increasingly clear that Canadians care about the quality of products they purchase and they 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 they were less likely to be potentially harmful to their health.

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 have become increasingly aware 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.

We recognize that the government does not intend to put regulations in place for edible cannabis until at least a year after cannabis is legalized, it is important to note food that contains cannabis will be required to comply with existing regulations under the *Food and Drugs Act* and the *Consumer Packaging and Labelling Act*. Allowing for organic certification on cannabis packaging now will help ensure that once edibles are regulated they will be in compliance with existing rules and regulations.

TGOD was pleased to note that the proposed packaging and labelling requirements set out in the consultation paper are focused on promoting informed consumer choice.



Recommendation

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 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.

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 greatly reduce the public health risk by ensuring that the cannabis we produce is greener, cleaner and always of the highest quality.

With your support, we can seize the opportunity presented by the legalization of cannabis to ensure that quality and environmental protection 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 and Senate will see The Green Organic Dutchman as a valuable partner, helping the government deliver on its commitment to public health and safety.

Sincerely,

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