

Intelligence MEMOS



From: Rosalie Wyonch
 To: The Hon. Jody Wilson-Raybould, Minister of Justice for Canada
 Date: October 2, 2018
 Re: REGULATION OF EDIBLE AND CONCENTRATED MARIJUANA PRODUCTS

In order to minimize the black market, the federal government and Health Canada should immediately develop regulations for edible and concentrated marijuana products.

Edible products are popular and consumers appear likely to purchase pre-made edibles from the black market instead of using legal cannabis oil to make their own. [Survey results indicate](#) that 28 percent of cannabis users consume edibles, 11 percent consume hashish, 11 percent use oil cartridges or vape pens and 8 percent use solid concentrates. None of these will be available at legal retail locations. This continued prohibition of derivative marijuana products puts legal retail at a competitive disadvantage to the illicit market and is detrimental to public health.

Data collected from [weedmaps.com](#) in Vancouver, Toronto, Ottawa and Montreal gives product listings for 83 dispensary storefronts and more than 100 delivery or mail order services offering consumables. Across all products, there is a wide variety available in a range of prices (Figure). Edible products lack standardization of potency, servings per package and products available. For example, the most expensive and potent “gummy” edible in the listings is \$35 each and contains ~400 mg of [Tetrahydrocannabinol](#) (THC) and/or [cannabidiol](#) (CBD). The average price of a gummy/hard candy is only \$6.50 with advertised potency of about 10-20mg of THC/CBD. There are also advertisements for THC/CBD capsules, Rice Krispy treats, brownies, gummy and sour candies, lollipops, jelly beans, oral sprays, cotton candy, dried apricots, olive/coconut oil, chocolate bars and even cannabis infused beverages (tea and lemonade). There was even one advertisement for cannabis-infused dog treats.

When edibles and concentrated marijuana products are sold in the black market, there is no guarantee that potency information is accurate or that the product will not contain harmful solvents used in the extraction process. In addition, they do not carry health warnings and are unlikely to be sold in child-proof containers. These features make unregulated illicit marijuana edibles a substantial public health risk.

Regulating edible and concentrated marijuana products would help bring some consistency across products and mitigate some of the risks of accidental overdose. Colorado, for example, limits recreational edibles to 100 mg per package and requires a listing of the number of 10-mg

servings per package. In addition, edibles cannot be shaped like humans, animals, fruit, or cartoons and cannot be called “candy”. These rules were put in place after Colorado experienced issues with overconsumption, accidental ingestion, pesticide residues and amounts of psychoactive ingredients not matching labels.

If the legal market is to be competitive, the federal government should not allow continued prohibition of the retail of cannabis derived products.

Figure: Average Prices for Various Marijuana Products, by City (\$/g)

		Toronto	Montreal	Vancouver	Ottawa	Delivery
Number of Storefronts		33	7	21	22	100+*
Indica	1g	11.05	9.76	10.73	10.46	10.40
	quarter	10.99	8.25	9.62	9.71	9.85
	oz	9.11	7.54	8.66	8.82	8.36
Sativa	1g	10.84	9.07	10.86	11.07	10.59
	quarter	10.79	8.11	9.78	10.14	10.26
	oz	9.84	7.71	8.73	9.35	8.89
Hybrid	1g	11.41	9.50	10.39	10.23	10.55
	quarter	11.37	8.02	9.25	9.38	9.97
	oz	9.45	7.33	8.45	8.70	8.74
Concentrate	Hash (Afghan, Moroccan, Black)	14.13	18.00	19.67	16.63	17.80
	Oil Cartridge (for vape pen)	60.00	40.00	33.33	53.88	62.50
	Shatter/honey oil	51.67	30.00	56.88	55.00	50.91

Notes: individual product data sourced from weedmaps.com and was collected July 20-22, 2018 (n=589).

*number of observations used for calculations = 76

Rosalie Wyonch is a Policy Analyst at the C.D. Howe Institute.

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