Canadian National Medical Marijuana Association (CNMMA)

- **Our Mission**
  Is to ensure all Canadian patients who benefit from medical marijuana, have access to the highest quality of product and services, to meet their specific health care needs in a safe, well-regulated environment.

- **Our Purpose**
  As a united community, the CNMMA seeks to:
  - Advocate for the sector
  - Guide patients and educate Canadians
  - Be a resource for medical practitioners
  - Reputation management
  - Share best practices
  - Be a resource to Health Canada

- **Our Members**
  Comprise of Applicant & Licensed Producers, Physicians, Patients and affiliated businesses within the Canadian cannabis industry,
Canadian MMPR Landscape

- 19 - Fully Authorized Licensed producers (Cultivate & Sell)
- 5 - Licensed Producers - Cultivation Only
- 2 - Licensed Producers - Sale Only
- Access to provide other forms of marijuana other than dried product on July 8, 2015.
- 11 - Licensed Producers of fresh marijuana and cannabis oil - Production Only
- About 8,000 physicians are currently prescribing cannabis.
- AB-10%; BC-15%; MB-3%; NB-3%; NL-2%; NS-6%; ON-50%; PE-1%; QC-4%; SK-5%; Territories-0%.
- Most Provinces/ Territories Medical colleges have issued guidelines/policies for their members as it pertains to the MMPR.

Source: Health Canada
Canadian MMPR Landscape

Source: Health Canada/ Dundee Capital Markets
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<tbody>
<tr>
<td>Produced (kg)</td>
<td>1,020</td>
<td>1,435</td>
<td>1,809</td>
<td>1,786</td>
<td>6,049</td>
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<tr>
<td>Sold (kg)</td>
<td>408</td>
<td>596</td>
<td>789</td>
<td>979</td>
<td>2,771</td>
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<td>LP inventories (kg)</td>
<td>1,134</td>
<td>2,021</td>
<td>2,994</td>
<td>4,810</td>
<td>4,810</td>
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<tr>
<td>Authorized per client (g/day)</td>
<td>4.0</td>
<td>4.0</td>
<td>4.0</td>
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<td>4.0</td>
</tr>
<tr>
<td>Per client shipment (g/day)</td>
<td>1.0</td>
<td>1.0</td>
<td>1.0</td>
<td>1.0</td>
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</tr>
<tr>
<td>Number of patients</td>
<td>7,914</td>
<td>12,409</td>
<td>15,545</td>
<td>18,512</td>
<td>18,512</td>
</tr>
</tbody>
</table>

Source: Health Canada/ Dundee Capital Markets
Current Status – Production

• Collective licensed production amount is 24,000 kg/year or 2,000 kg/month
  ➢ Approx. 2,100 kg sold from April 1, 2014 to January 31, 2015

• Sufficient supply to meet current demand in January:
  ➢ 313 kg sold
  ➢ 733 kg produced
  ➢ 3,035 kg in inventory

• 65,065 total shipments from April 1, 2014 to January 31, 2015
  ➢ Fewer than 6% of orders could not be filled

• Prices range from $1.75/g to $15/g

• Producers are offering a wide variety of strains (nearly 100)
  ➢ Most strains are higher in THC/low in CBD, with the highest level of THC observed at 27%
Current Status – Compliance and Enforcement

- Rigorous compliance and enforcement activities in place to protect public health, safety and security
  - 215 inspections
  - 5 recalls as a result of product quality issues
Cannabis Waste Management

- The MMPR (Federal Government Regulations) mention the following:

  *Please note that all waste cannabis material from cultivation or production is considered to be a controlled substance with the exception of mature cannabis stalks that do not include leaves, flowers, branches or seeds; and fibers derived from the stalks as well as any non-viable cannabis seeds as per Schedule II of the CDSA. Waste cannabis material that is a controlled substance must be secured in accordance with the CDSA and as outlined in Health Canada’s Directive on Physical Security Requirements for Controlled Substances (Security Directive) until destroyed.*

- Can Cannabis Waste be destroyed with other waste? Can it be composted?

  - No. The MMPR explicitly require LP’s (Licensed Producers) to separate Cannabis and Non Cannabis waste at all times. For Cannabis waste they are required to denature cannabis and or dried marijuana to such an extent that its consumption is rendered impossible or improbable. On that part, some LP’s have incinerators within their facilitates whereas others are mixing it with kitty litter. Paranoid over this, Health Canada has even gone to the extent of asking LP’s and Applicant LP’s during inspections to describe the percentage of Cannabis to how many parts of kitty litter being employed on their site.

- Here is an example of what an S.O.P (Standard Operating Procedure) pertinent to destruction/disposal of cannabis waste are required to be prepared and followed which are also audited by Health Canada:
Cannabis Waste Management

RESPONSIBILITIES

1.1 Waste Identification & Segregation: Production Associate/Lead/ RPIC
1.2 Waste Transfer & Tracking: Production Associate/RPIC
1.3 Reconciliation & Verification: Production Manager/Lead/ RPIC
1.4 Periodic Compliance Review: RPIC/ Quality Assurance Associate/ Manager
1.5 Record Archival: Compliance Associate

1.6 Requirements of Cannabis Waste Collection & Management

1.6.1 Ensure that all waste cannabis material meeting the definition of a controlled substance, is either taken directly to Vault and denatured via a Health Canada-approved method in the presence of a RPIC who must witness the denaturing.
1.6.2 Ensure that all cannabis waste is destroyed or denatured using a Health Canada approved process, before being stored in a restricted area until it is shipped off site. Witness the denaturing/destruction process is conducted only by a company approved to destroy controlled substances.

1.6.3 Destroy all waste cannabis in the presence of at least two (2) people who are approved under section 20 of the MMPR to witness the destruction of waste cannabis. (See references section 8 below).

1.6.4 Ensure that all cannabis waste, which is undergoing denaturing, is placed in a sealed container and stored in the vault for at least 72 hours. This ensures that it is no longer considered a controlled substance under the CDSA, and can be taken for destruction and all waste is properly reconcilable with production inventory and destruction records.

1.6.5 Ensure that all cannabis stored within the vault, is stored in the correct and designated location so as to ensure accuracy of operations.

1.6.6 Ensure that all cannabis and cannabis waste product is only handled, moved, denatured or destroyed by those who are required to do so as part of their job duties.

1.6.7 Ensure that contact with cannabis and cannabis waste, whether in plant form, dried form and when being transported, only occurs in the direct presence of (and under supervision of) a RPIC.
1.6.8 Ensure that any and all irregularities related to cannabis and cannabis waste are immediately reported to a RPIC.

1.7 Cannabis Waste Collection and Management Process

1.7.1 Active grow rooms and the water area are equipped with municipal garbage, municipal recycling, wet cannabis waste and waste growing medium collection containers.

1.7.2 Trimming areas are equipped with wet cannabis waste collection container.

1.7.3 The packaging/processing room is equipped with dry cannabis waste collection containers and sharps disposal/biohazard containers.

1.7.4 Cannabis waste will be collected on a daily basis from each production area/room and labeled in accordance with SOP Status Labelling.

1.7.5 Weigh and document the collected cannabis waste details on the Cannabis Waste Disposal Form (Appendix 8.2). Identify and label all waste containers as per SOP: Status Labelling and transfer to the vault for a period of at least 72 hours prior to destruction.

1.7.6 Collected wet and dry cannabis waste is weighed, stored and disposed of in accordance with SOP: Destruction of Cannabis Waste & Marihuana Products.
1.8 Collection & Management of Non-Cannabis Waste

5.1.1 Waste collection containers will be deployed in shipping areas equipped with municipal garbage and municipal recycling collection containers.

5.1.2 All non-cannabis waste must be inspected by the RPIC or SPIC in the presence of a witness prior to being removed from the facility for disposal.

5.1.3 The RPIC/SPIC and witness must sign and date the Non-Cannabis Waste Disposal Control Form (Appendix 8.3), and indicate the waste stream and quantity of bags or material inspected. Once inspected, the waste is immediately removed from the facility under the supervision of the RPIC or SPIC and disposed of as appropriate.

5.1.4 Used/waste growing medium are collected when bags are ¾ full and every Friday. Remove bag from the container, tie off, and place on dolly. Replace with appropriately coloured new bag. Wheel dolly to Secure Waste Storage room and place in designated “Used/waste Growing Medium” area.
5.1.5 Waste will be collected according to the predetermined schedules and protocols.

5.1.6 Municipal garbage and municipal recycling are collected when bags are ¾ full and every Friday. Remove bag from the container, tie off, and place on dolly. Replace with appropriately coloured new bag. Wheel dolly to secure Waste Storage room and place in designated 'Municipal Waste Area'.

5.1.7 Sharps/biohazard waste is collected when the collection container is ¾ full. Place the container on dolly and replace with an empty sharps/biohazard collection container. Wheel dolly to Secure Waste Storage room and place in designated 'Sharps/biohazard' area.

5.1.8 Collected waste will be stored in the Secure Waste Storage room. Colour coded areas for storage of each waste stream will be identified in the Secure Waste Storage room using colour coded tape.
1.9 **General Requirements**

1.9.1 Each time a Cannabis Waste Disposal Form is completed, attach a copy to the bulk waste container file sleeve and to the respective Batch Production Records.

1.9.2 Document all the observations in the Batch Production Record and complete the relevant disposal and destruction forms.

1.9.3 Archive and retain all batch production records by Compliance Associate as per SOP: *Record Keeping & Management of GPP & Regulatory Records*

1.9.4 Retain all the records on the premises for a period of at least two (2) years after the date of last sale or provision of any portion of the lot of batch as per SOP: *Retention of Regulatory, Quality & GPP related Documents and Records*. 
A United Community - Together the medical marijuana sector in Canada will thrive as patients receive the support they require.