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your questions
into the chat
and they will
be addressed
during the
Q&A.





Public health and law enforcement in partnership: what does the public need to know about illegal cannabis?

OCTOBER 26TH, 2021

- ❖ **Kim Shelford & Hovan Baghdassarian, BC Cannabis Secretariat**
- ❖ **Rachel Huggins, Deputy Director, Executive Lead Cannabis Legalization, Organized Crime Enforcement Bureau, Ontario Provincial Police**
- ❖ **Angela Eykelbosh, NCCEH**

TODAY

- Angela Eykelbosh, NCCEH
 - **Updated:** *Cannabis Resources for EH Practitioners*
- Kim Shelford & Hovan Baghdassarian, BC Cannabis Secretariat
- Rachel Huggins, Organized Crime Enforcement Bureau (OPP)
- Summary and Key Messages



3 Years Since Legalization


- Governed by the *Cannabis Act* and the Cannabis Regulations
 - 2018: fresh and dried cannabis, oils, seeds, and plants
 - 2019: edibles, extracts, and topicals.
- Public health goals: de-stigmatize use, address and reduce problematic use, especially among young adults.



Public Health Impacts vs. Use

- Public health impacts still difficult to assess (Fischer et al. 2020):
 - PT differences in regulations and access
 - COVID-19 may have had large impact (BC [SPEAK](#))
- Use patterns are shifting:
 - National Cannabis Survey every 3 months since Feb. 2018
 - 54% "usually" obtained their cannabis from a legal source
 - Still, many Canadians buying from unregulated or illegal sources





What makes legal cannabis “safe”?

- Every batch of licensed cannabis tested for:
 - Microbial contaminants: Bacteria, fungi, etc.
 - Chemical contaminants: Pesticides, metals, solvents, aflatoxins, etc.
 - Cannabinoid content (weed fraud)
- If a sample **fails**, Health Canada requires...
 - A root cause analysis
 - HRA to determine whether fit for sale

We know very little about illegal product quality

- **Law enforcement** encounters the product, but has no mandate to analyze or communicate health information to the public
- **Public health (PH)** difficult to access illegal cannabis for research purposes, limited analytical capacity/expertise for this product type.



The BC Cannabis Secretariat

The Province of BC's central coordinating body for non-medical cannabis policy.

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Who are the other key entities we work with?

Agency	Liquor and Cannabis Regulation Branch (LCRB)	Policing and Security Branch (PSB)	Cannabis Secretariat (CS)	Liquor Distribution Branch (LDB)
Mandate:	<p>Licenses cannabis retail stores.</p> <p>Conducts compliance and enforcement activities with licencees.</p> <p>Maintains policy and regulations governing retail sales.</p>	<p>Operates a Community Safety Unit (CSU) to lead enforcement against illicit cannabis sellers in collaboration with RCMP and local communities.</p> <p>Supports LCRB with security screening for retail licence applicants.</p>	<p>Develops strategic policy on cross-cutting issues, particularly those outside of other agencies' mandates.</p> <p>Coordinates cross-government action on cannabis-related issues.</p> <p>Negotiates with Indigenous nations.</p>	<p>Operates a provincial monopoly wholesale distribution business.</p> <p>Registers cannabis products.</p> <p>Runs a chain of public-owned stores.</p>

Why are we interested in testing illicit cannabis?

Cannabis from unregulated sources, such as illicit storefronts and websites, still represents a large proportion of cannabis consumed in BC.

See the raw data on chemical and microbiological quality, including THC/CBD content, in the link.

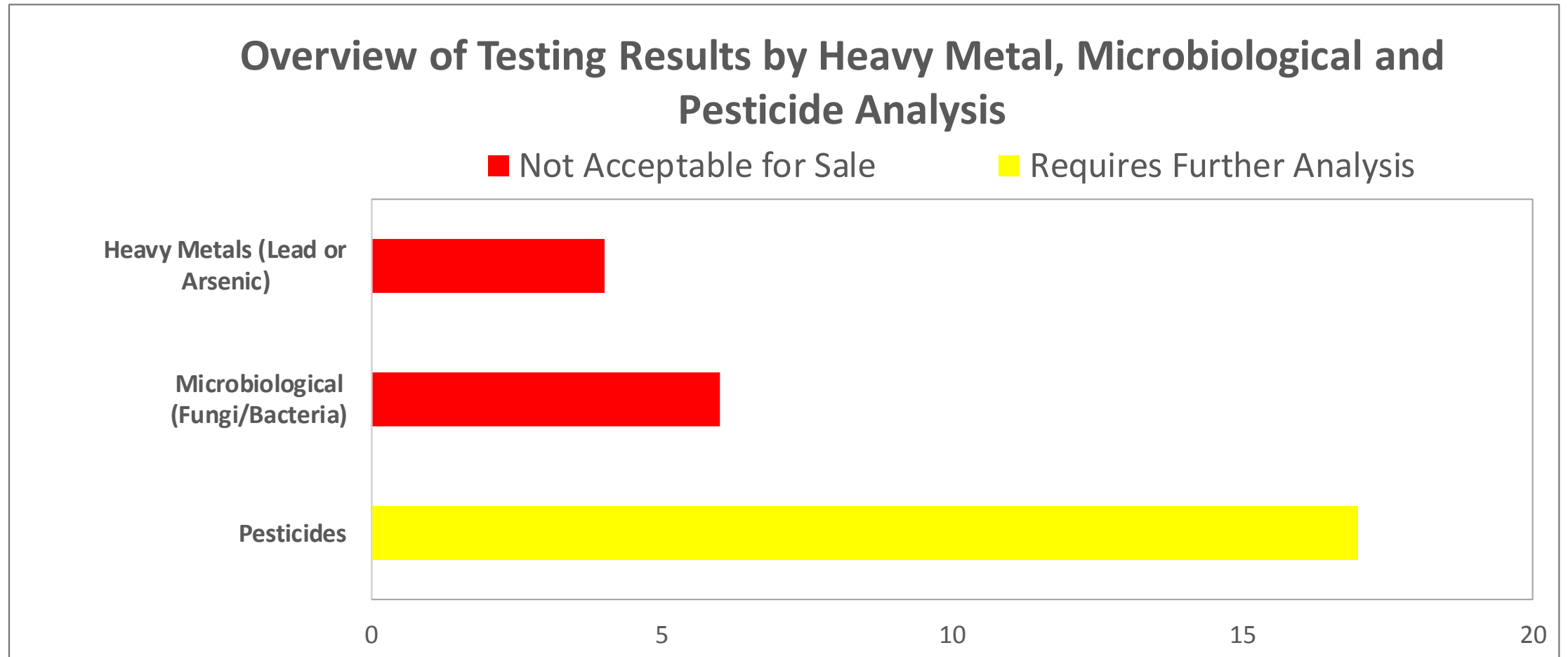


Study Summary

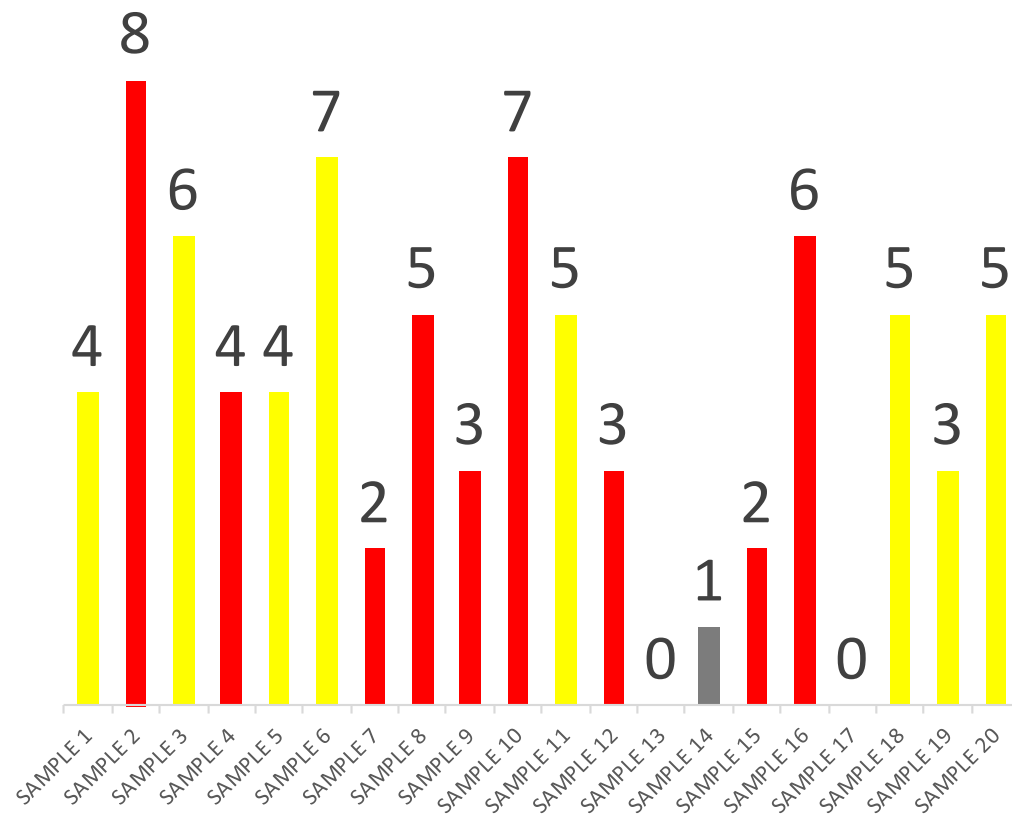
- Tested 20 dried cannabis samples seized from illicit stores in the Metro Vancouver region.
- Samples were tested for microbials, aflatoxins, heavy metals, pesticides, and CBD/THC levels.
- We partnered with the BCCDC and the NCCEH to assess the results and develop materials to inform the public and health professionals.
- Read it at www.ncceh.ca: ***Unregulated cannabis: Risky production practices raise concern for consumers***



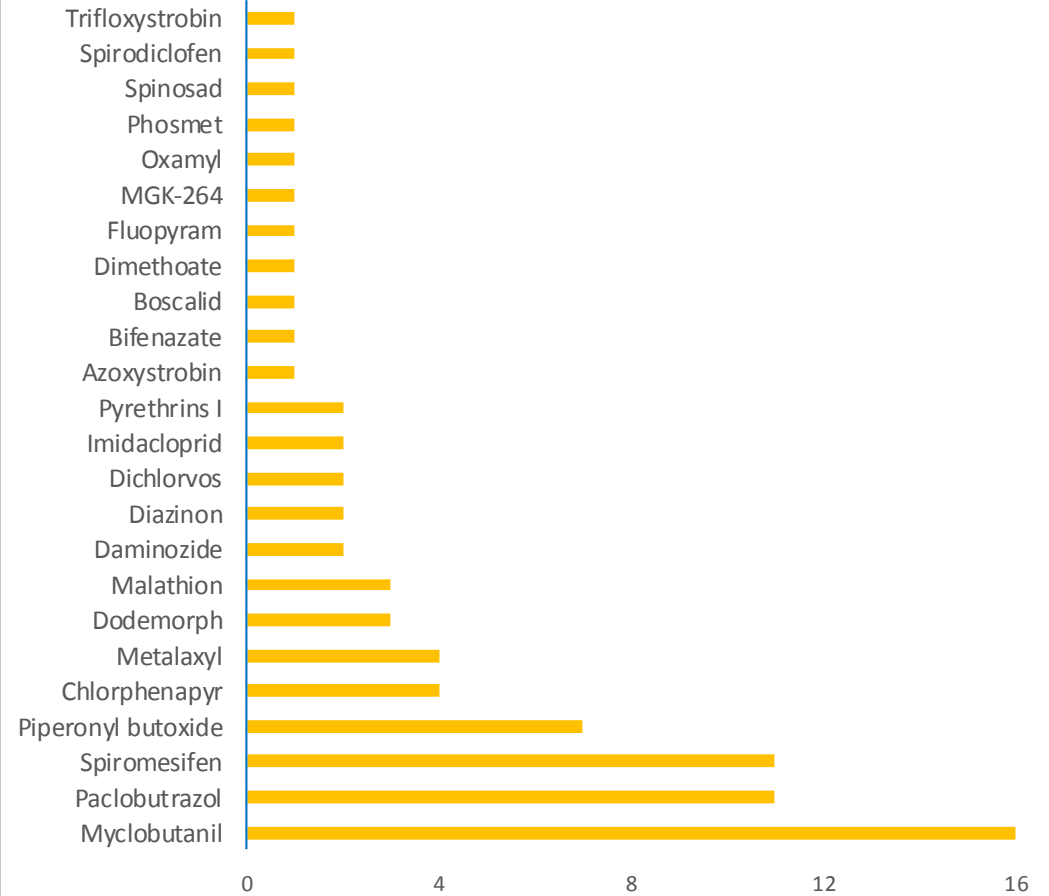
What were the testing results?



Count of pesticides found per sample



Count of samples per pesticide





What do we hope to achieve with the results?

- Raise awareness about contaminants that may be present in cannabis purchased from an illicit source
- Add to the ongoing dialogue about illicit cannabis
- Continued collaboration with public health on future testing projects



ONTARIO PROVINCIAL POLICE

Illegal Cannabis

Presented by:
Rachel Huggins, Deputy Director,
Executive Lead Cannabis Legalization

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Purpose

- Ontario Provincial Police (OPP) approach to cannabis
- Illegal cannabis market in Ontario
- Health Canada medical cannabis personal production program & organized crime
- Illegal cannabis testing & results
- The plan



Ontario Provincial Police

The Ontario Provincial Police (OPP) Organized Crime Enforcement Bureau (OCEB) works with municipal, provincial, national and international policing and law enforcement partners to target organized crime

- Executive Lead, Cannabis Legalization
- Provincial Joint Force Cannabis Enforcement Team (PJFCET) (3 years)

Challenges since legalization

- Learning as we go – new federal and provincial legislation and regulations
- Everything is criminal
- New kinds of criminal activities and quazi-criminal enterprises (legal/illegal)

Hybrid enforcement and policy approach - rare in the enforcement world:

- intelligence led and strategic enforcement action driven by a matrix approach
- policy and data driven initiatives focus on building and nurturing new partnerships with non-enforcement entities
- operating with complete transparency and being proactive
- open communication with partners and the public





PJFCET ILLEGAL CANNABIS ENFORCEMENT

December 2018 –
July 31, 2021



Total
Arrests:
694



Firearms
Seized:
60



Illegal
Storefronts:
79



Residential
Dwellings:
53



Currency
Seized:
\$3.8M



Proceeds of
Crime Seized:
\$11.6M



Illegal Production Sites:

PJFCET: **34**

OPP CSCU*: **26**

Central Region: **26**

East Region: **31**

North East Region: **1**

West Region: **12**



Value of
Cannabis Seized:
\$498M



Cannabis
Plants Seized:
447,526



Dried
Cannabis
Seized: **12.5M GRAMS**
(27,530LBS)



Total Warrants Executed:
256

*PJFCET: Provincial Joint Forces Cannabis Enforcement Team

**OPP CSCU: Community Street Crime Unit



Medical Cannabis Production

	British Columbia	Ontario	
Active personal/designated production registrations			
2018-10	5,747	9,037	
2021-03	7,966	13,141	
Average daily amount authorized by health care practitioners of dried cannabis for medical purposes associated with active registrations (grams per day)			
2018-10	36.6	25.1	
2021-03	63.7	43.9	
Health care practitioners associated with active personal/designated registrations who authorized amounts equal to or above 25 grams per day			
2021-03	169	132	
Average number of doctors (not including nurse practitioners)			
2019	6,366	14,962	

Compare:
8,045 health care practitioners associated with registrations federally licensed sellers (in 12 month period)

































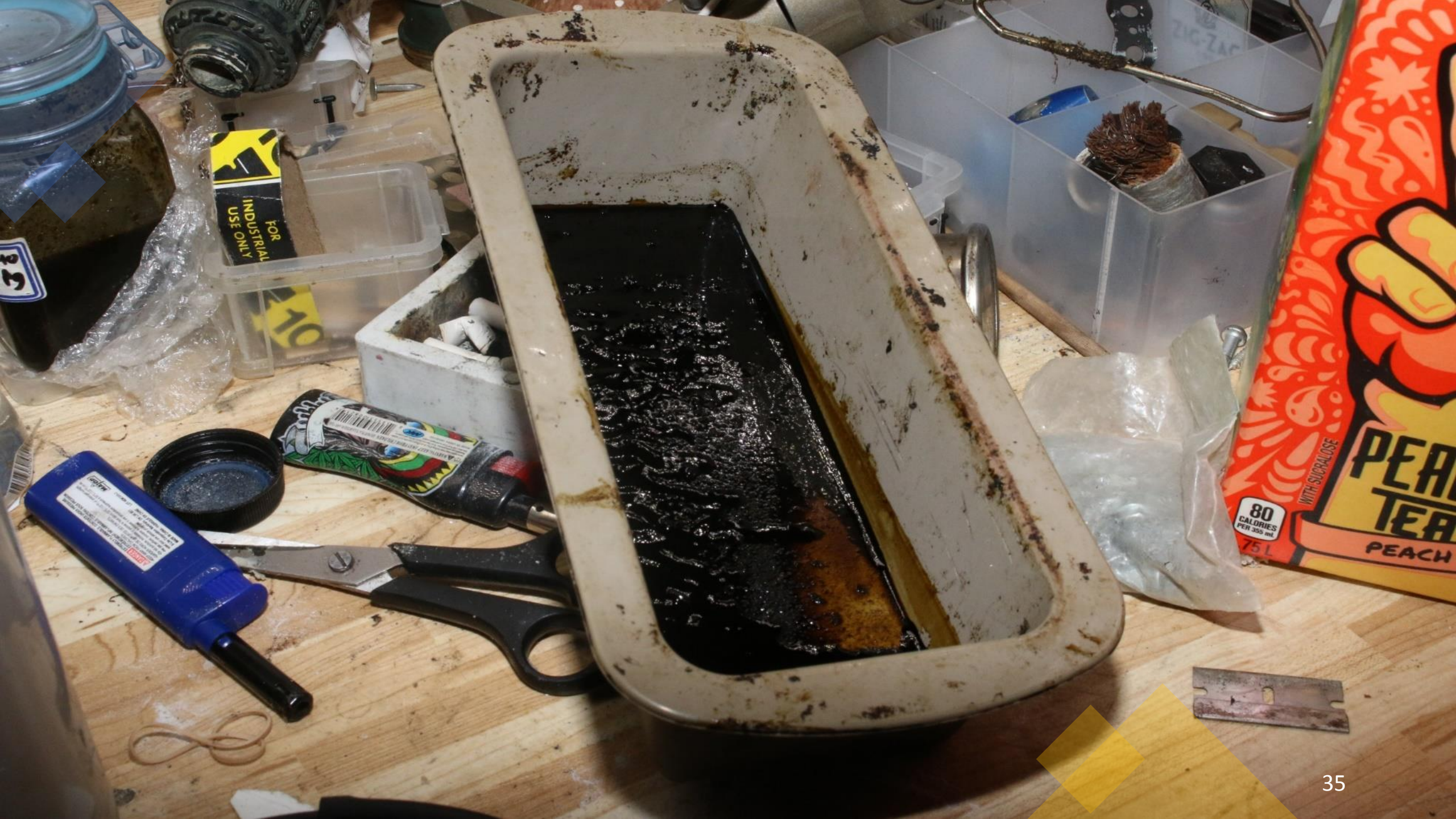
AUTHORIZED
PERSONNEL ONLY:
BEYOND THIS POINT

**CHEMICAL
STORAGE
AREA**

DANGER
PESTICIDE
STORAGE
AREA

DANGER
NO
PEDESTRIANS

**PESTICIDAS
FREGUENTEMENTE**















Protected B – Third Party Rule- Not For Disclosure: Intelligence/ Presentation
Purposes Only





A video describing the aims and objectives of PFJCET can be found at the following link:

<https://www.opp.ca/protonapi/files/60511027241f8402864ac083>

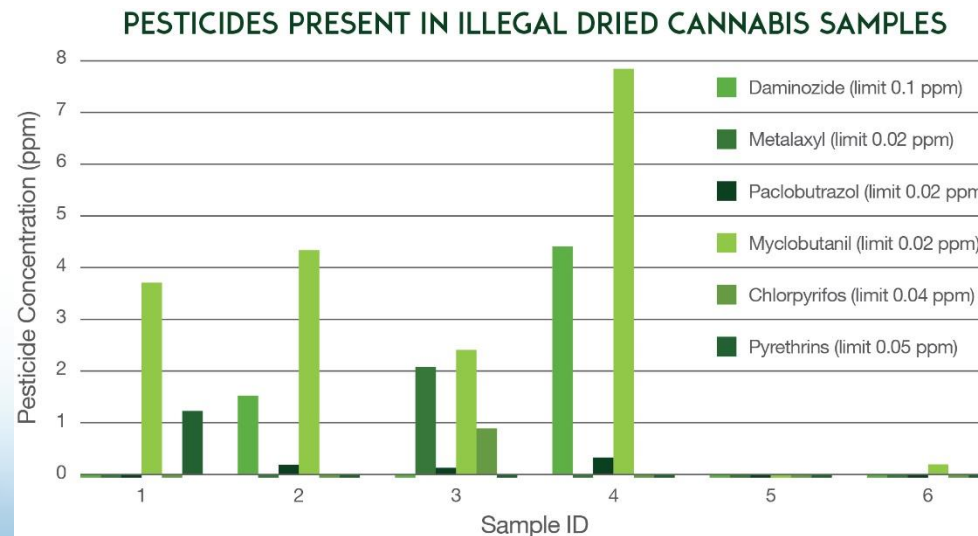
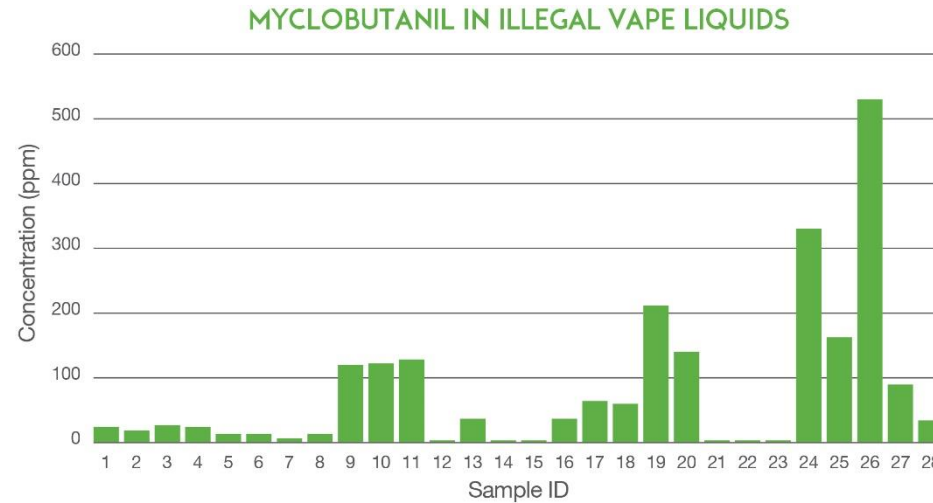
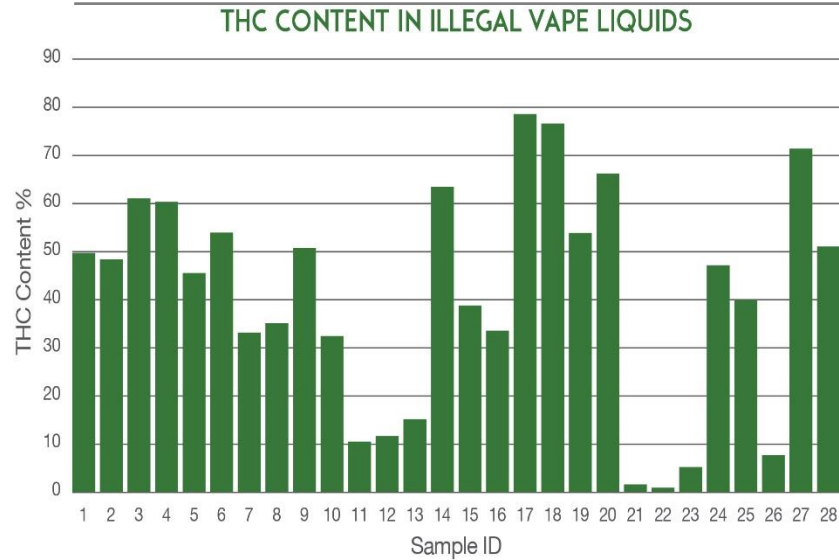
National Research Council Canada & Ontario Provincial Police Screening Illegal Cannabis Products Pilot Project

Pilot Start Date: **November 2019**

- The National Research Council of Canada's Metrology Research Center is dedicated to promoting measurement science in Canada
- Agreement to test a wide variety of seized cannabis products in police custody (cannabis edibles samples in the form of cake, gummies/candies, topicals, oils/vape pen, as well as bud and plants)
- Objective:
 - develop testing methodology and standards
 - acquire THC levels to a 95% accuracy
 - identify other contaminants such as illicit substances
 - identify levels of prohibited/banned pesticides
- Information pertinent to demonstrate in court the dangers associated with illegal cannabis products and inform the public of the public health and public safety risks associated to illegal cannabis



Testing Illegal Cannabis Results



The Plan

- The OPP and other police services across the country continue to enforce the *Cannabis Act* and provincial cannabis statutes
- Identify Public Health champions to support enforcement and lead public messaging on the harms of illegal cannabis
- Increase testing –NRC currently testing illegal cannabis products packaged in trademark products like Nerds, Smarties, Cheetos, etc.
- Canadian Association Chief of Police (CACP) Special Purpose Committee on Cannabis
 - consulting with police and police partners on successes and barriers to cannabis enforcement
 - inform the CACP position and recommendations in relation to actionable legislative, policy, and procedural requirements to better support and advance the Government's commitment of keeping cannabis away from children and profits out of the hands of organized crime
- Contribute to the Health Canada-led Cannabis Act Review



Analysis of Illicit and Legal Cannabis Products for a Suite of Chemical and Microbial Contaminants

A Comparative Study

Diane Botelho*, April Boudreau, Andrien Rackov, Attiq Rehman, Bruce Phillips, Cathy Hay, Karen Broad, Peter Crowhurst, Sara Cockburn, Troy Smith, Barbora Balonova
New Brunswick Research and Productivity Council (RPC)

Legal vs. Illegal Product Flower & Edibles

- Potency: Legal products contained about 91% of THC promised, vs. 43% for illegal products
- Uniformity of mass: ~80.4% of mass promised
- BTGN, Total Bacteria, Yeasts, total Mould : all legal flower samples passed, no illegal product passed all tests. (Edibles fared much better)
- All samples OK for metals
- No illegal sample passed the limited pesticides panel (8 active ingredients)

Public Health Implications

- Illegal cannabis contamination likely widespread, as in other poorly regulated or illegal markets.
 - Concentrates/extracts even more.
- Risk of health effects?
- May be other contaminants present NOT part of the standard test panel
- Safe production not being prioritized... will it get worse?
- Pesticides may pose ecological and occupational health risk



What is the role of public health with regard to illegal cannabis?

- Conversation driven by regulators, public safety and industry at present.
- Risk communication to public
 - Share back your campaigns!
- Risk communication to HCPs authorizing medical use
 - Prescribing factsheet
- Harm reduction: protecting those transitioning off opioids



A circular inset image on the left side of the slide shows a person wearing a white lab coat and a white face mask, holding a green cannabis plant with long, thin leaves and a developing bud. The person's face is partially visible through the mask.

Summary/Key Messages

- Health Canada regulates producers, but is not mandated to monitor/risk communicate about illegal cannabis. We have a blind spot!
- Data indicates that contamination is common in illegal cannabis
- As more legacy producers go legal, this problem may get worse. Who will respond?
- Need more widespread risk communication about illegal cannabis and the safeguards in the legal system.



Thank you!
Questions?

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