



2022 CANADA

PACKAGING AND LABELING REQUIREMENTS

This information is based on the Canadian Cannabis Act, Cannabis Regulations, and the Packaging and Labelling Guide for Cannabis Product, 40 pages, “Requirements under the Cannabis Act and the Cannabis Regulations”, Published by Health Canada.

WARNING: Attempting to design compliant packaging or labelling without referring directly to the lengthy and very detailed regulations or the 40 page Guide is not recommended.

Prohibitions: In addition to the packaging and labelling prohibitions commonly found in other jurisdictions, Canada prohibits: “lifestyle” content and representations that “associate” a cannabis product with alcohol or tobacco or any tobacco vaping product; or “create the impression” of health or cosmetic benefits (there is a separate 34 page guide on this issue entitled “Guidance on Health Products Containing Cannabis...etc.”); or “concern” the energy value or nutrients in edibles; or “create the impression” that edible products meet dietary requirements; or anything that “would cause a person to believe” that a product has any flavour other than that of cannabis, such as confectionary, dessert, soft drink and energy drink flavours.

Plain Packaging: The regulations are intended to require “plain packaging and labelling” for all cannabis products so that they will not be, among other things, attractive to “young persons” (as differentiated from “children”). The regulations require smooth surfaces, single uniform colours (and prohibit fluorescent or metallic colours), restrict the use of images or brand elements, etc.

Packaging: There are detailed packaging requirements for “immediate containers”, “wrappers” in contact with a product, and “outermost containers.”

Labelling: Labelling in English and in French is required. Text must be black on a white background and comply with detailed requirements concerning permissible fonts and font sizes, line spacing, etc.

The **standardized cannabis symbol** of the specified size, proportionality and orientation, must be displayed on the top left 25% of the principal display panel.

Health warning messages must be displayed in rotation on each type of container of each brand name of the cannabis product that is packaged in a year, so that each message is displayed, to the extent possible, on equal numbers of containers of that product. Topicals are exempt because they have a single health warning message.

Brand name must be displayed on the principal display panel. In addition, a single brand element may also be displayed there.

Edibles: Must be shelf-stable, not requiring refrigeration. There are special requirements for listing of sugar based ingredients, as well as for glutens, added sulfites and allergens. Cross-contamination statements may be required. If factually correct, products may be labelled “gluten-free” but may not be labelled “allergen-free”.

Product specific requirements: There are detailed product specific packaging and labeling requirements in the regulations.

Example: Packaging and labeling requirements for edibles “in discrete units.”

1. The standardized cannabis symbol
2. The brand name of the cannabis product
3. Other brand element
4. THC and CBD content
5. Health warning message
6. Other required information about the cannabis product
7. Nutrition facts table
8. List of ingredients
9. Bar code

DISCLAIMER: THESE REQUIREMENTS ARE BELIEVED TO BE ACCURATE, BUT ARE NOT ALL-INCLUSIVE AND ARE SUBJECT TO CHANGE. THEY SHOULD NOT BE RELIED UPON FOR COMPLIANCE WITH ALL LAWS AND REGULATIONS RELATING TO PACKAGING AND LABELING IN CANADA.