

# CANNABIS STANDARD

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## **1.0 PURPOSE**

To provide guidance on the procurement, use, handling, and storage of cannabis for research purposes at the University of Waterloo.

## **2.0 SCOPE**

This standard covers the use, handling, or other manipulation of cannabis for research purposes at the University of Waterloo and outlines the requirements for obtaining a research or analytical testing license. It does not outline the requirements for other license types.

## **3.0 ROLES AND RESPONSIBILITIES**

Roles relevant to the use, handling, and storage of cannabis at the University of Waterloo are outlined below.

### **3.1 UNIVERSITY OF WATERLOO**

University of Waterloo provides resources to enable researchers to comply with legislative requirements associated with cannabis research.

### **3.2 SUPERVISOR/MANAGER/PRINCIPAL INVESTIGATOR (PI)**

The supervisor/manager/principal investigator (PI) is required to:

- Consult with the Safety Office regarding the proposed research project.
- Designate themselves as the “responsible person” for the licenses associated with their research.
- Provide information to Health Canada as required to complete the license applications.
- Initiate processes within their research group to ensure the following requirements are met:
  - Maintain records of cannabis as prescribed in Section 3 of this document.
  - Take adequate measures to protect and secure cannabis against, theft, inadvertent use, and loss.
  - Restrict access to cannabis to only those with a need associated with a licensed activity that falls under the research license.
  - Adhere to any other requirement as prescribed with respect to licenses granted under Health Canada.

- In the event of an extended absence from the University, make alternate arrangements for the possession and safekeeping of the cannabis including the license amendment required by these alternate arrangements.
- Immediately report any loss or theft of cannabis to UW Police. Immediately report any spill loss or theft to the Safety Office.
- Maintain, amend, and renew licenses as required.
- Upon completion of associated research, or when no longer needed; destroy all unused cannabis material through authorized destruction methods outlined in the license.
- Train workers on the requirements outlined in the license.

### **3.3 WORKERS**

- Complete required records as outlined in Section 3 of this document.
- Safeguard the cannabis and adhere to access control provisions.
- Report any spills or losses of cannabis to the PI immediately.
- Report any activities that contravene approved license activities to the PI immediately.

### **3.4 SAFETY OFFICE**

The Safety Office will initiate all licenses and track research activity with cannabis at the University. The Safety Office shall also oversee license activities and may perform any of the following actions:

- Audit and inspect labs as required.
- Conduct investigations where contraventions or deviations from activities prescribed in a license have occurred or are suspected to have occurred.
- Liaise with Health Canada regarding license applications and amendments associated with research programs involving cannabis.

### **3.5 UW POLICE**

- Consult with stakeholders (as required) regarding appropriate security provisions to be implemented, particularly if alarms, surveillance systems, or renovations are considered.
- Investigate any suspected loss or theft of cannabis.
- Liaise with law enforcement agencies as required.

## 4.0 PROCEDURES

### 4.1 LICENSE TYPES

There are several license types available depending on the type of work being conducted. Table 1 provides information on the authorized and restricted activities for those licenses.

**Table 1: Summary of authorized and restricted activities for each license type**

License Class	General Description, Authorized Activities and Restrictions
Research	<ul style="list-style-type: none"> <li>▪ For the purposes of research, possess, produce, transport, send, or deliver to sites authorized by the license</li> <li>▪ Generally, all cannabis must be destroyed at end of the research, however specific authorization may allow for limited sale and distribution to other researchers, or cultivation, analytical testing or cannabis drug license holders</li> <li>▪ Includes but is not limited to in-vitro, in-vivo, clinical trials, plant genetics, cannabis product development and research with hemp</li> </ul>
Analytical	<ul style="list-style-type: none"> <li>▪ Possess</li> <li>▪ Alter chemical or physical properties for purposes of testing</li> <li>▪ Samples must be destroyed within 90 days of completion of testing or within 120 days of receipt if testing not started</li> </ul>
Cultivation (Micro)	<ul style="list-style-type: none"> <li>▪ Possess, cultivate, propagate, harvest, test cannabis</li> <li>▪ Sell and distribute plants or seeds to other license holders as permitted</li> <li>▪ Planting surface area must be &lt;200 m<sup>2</sup></li> </ul>
Cultivation (Nursery)	<ul style="list-style-type: none"> <li>▪ Possess, cultivate, propagate, harvest, test cannabis</li> <li>▪ Sell and distribute plants or seeds to other license holders as permitted</li> <li>▪ For seed production, surface area of budding or flowering plants must be &lt;50m<sup>2</sup></li> <li>▪ &lt;5kg of flowering heads harvested from plants</li> <li>▪ Flowering heads (with exception of seeds), leaves and branches of plant must be destroyed within 30 days of harvest</li> </ul>
Processing (Standard)	<ul style="list-style-type: none"> <li>▪ Possess and produce cannabis (other than obtaining through propagation, cultivations or harvest)</li> <li>▪ Synthesize</li> <li>▪ Sell and distribute to other license holders as permitted</li> </ul>
Processing (Micro)	<ul style="list-style-type: none"> <li>▪ Possess and produce cannabis (other than obtaining through propagation, cultivations or harvest)</li> <li>▪ Sell and distribute to other license holders as permitted</li> <li>▪ No synthesis permitted</li> <li>▪ &lt; 600 kg of dried cannabis (or equivalent) in 1 year</li> </ul>
Sale – For Medical Purposes	<ul style="list-style-type: none"> <li>▪ Possess cannabis</li> <li>▪ Sell or distribute to client, hospital employee or license holder as permitted</li> </ul>

Figure 1 provides a decision tree to help determine which type of license is appropriate.

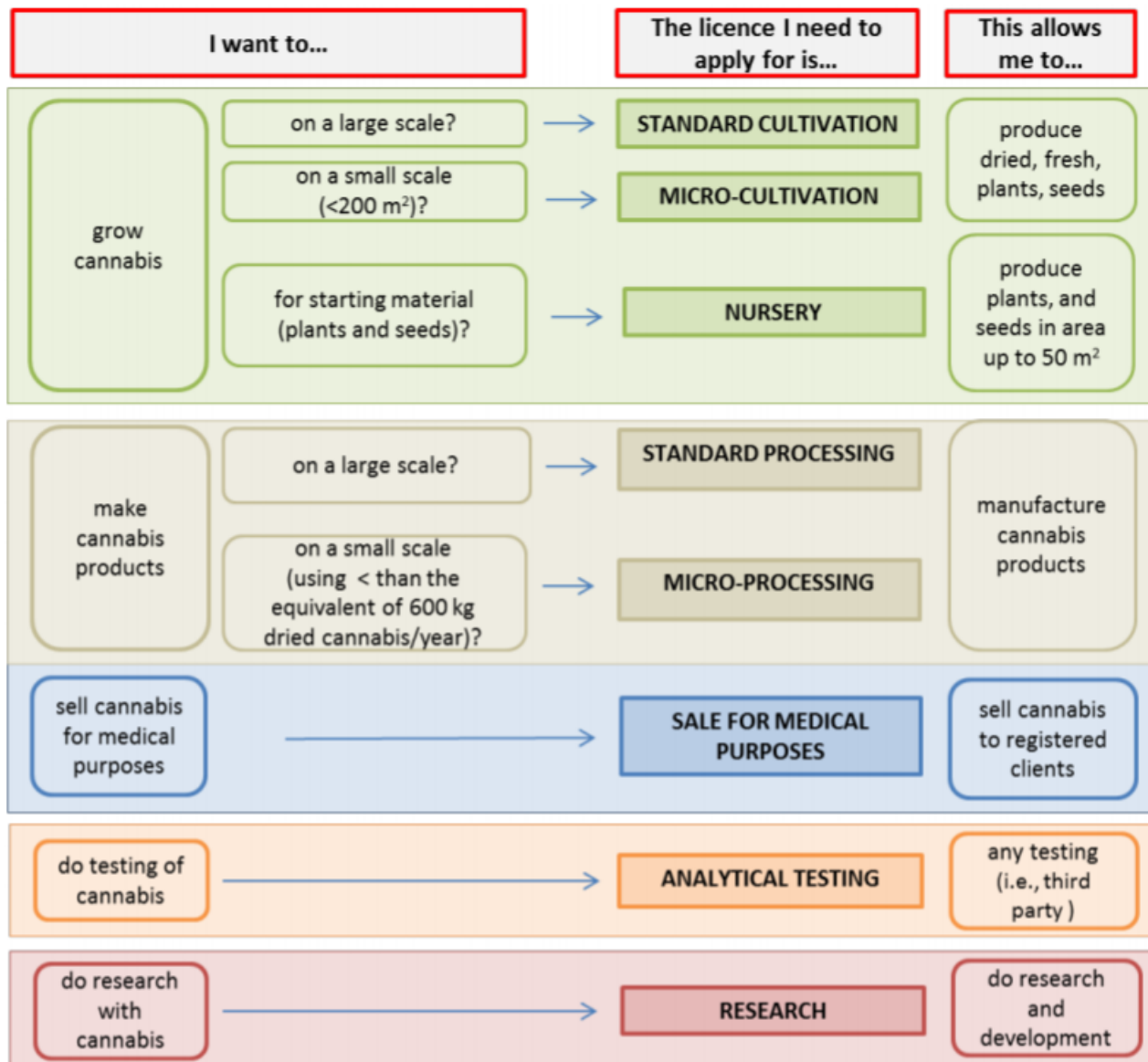


Figure 1: Cannabis classification of license types based upon activity (Cannabis Licensing Application Guide)

## 4.2 LICENSING

The University currently supports the analytical testing and the research licenses. The process for obtaining these licenses is outlined in Figure 2.

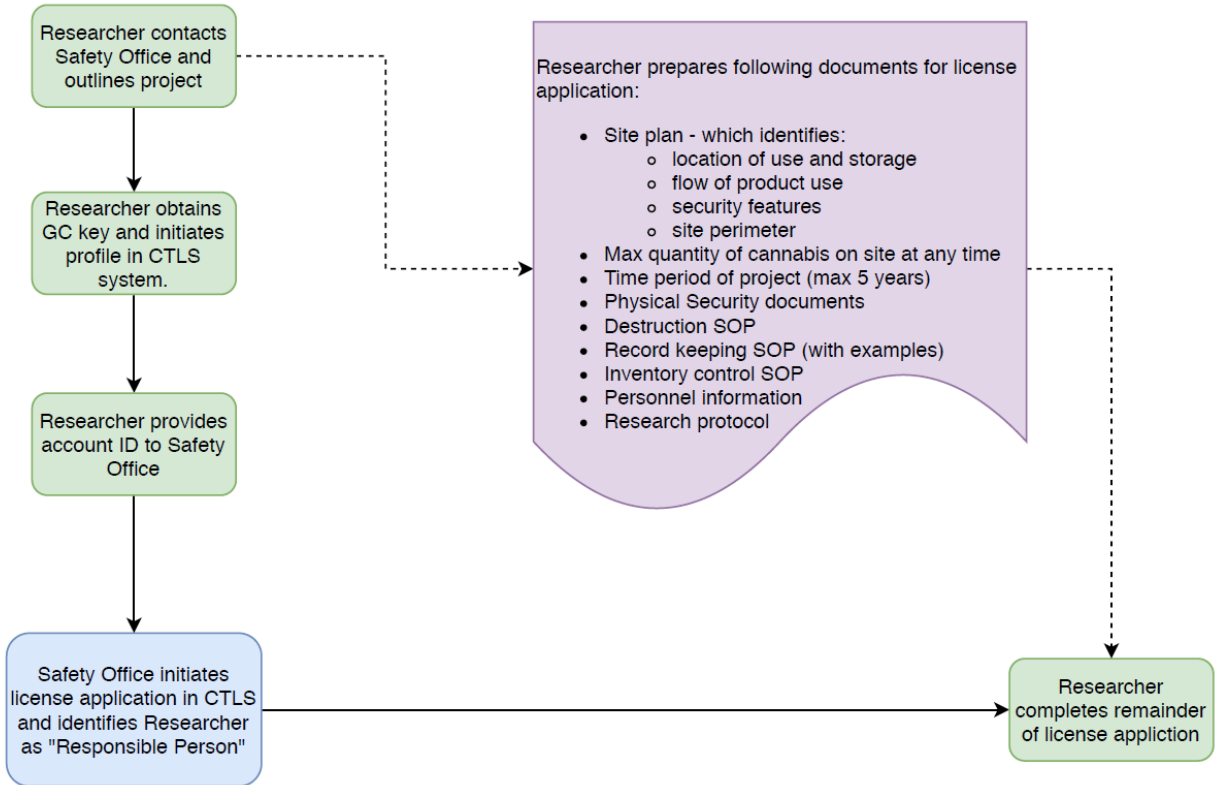


Figure 2: Process flow for license application initiation

## 4.3 DESTRUCTION

Authorized destruction methods must render the cannabis unavailable and unusable for subsequent use. Destruction methods to be used for the particular work are to be detailed in the license application.

For plant material, including seeds, appropriate destruction methods include:

- Autoclaving followed by mixing with soil/growth media.
- Grinding the plant material and combining it with other ground waste material so the cannabis content is < 50%. Other waste material may be soil, cardboard, food waste, manure, or other absorbent material.

For non-plant material (e.g., cannabis oil), an appropriate destruction includes mixing with liquid soap, absorbing with a spill absorbent material, and disposing via the University's hazardous waste procedures.

**All destruction must be:**

- Annotated in the appropriate inventory records and explicitly recorded (see section 4.5.4 for details regarding destruction records).
- Witnessed by the responsible person and another University employee. Students are not able to act as witnesses for destruction.

## **4.4 SECURITY**

### **4.4.1 SECURITY CLEARANCES**

Personnel security clearances are not a regulatory requirement of a research license or an analytical testing license, however they could be included as a license condition dependent on the risk as assessed by Health Canada.

### **4.4.2 PHYSICAL SECURITY**

- Research areas are to be designed to prevent unauthorized access.
- Storage areas are to be restricted access.
- Specifications for physical security will depend on the nature and scope of the research involved with consideration of the quantity of cannabis on site.

## **4.5 RECORDS**

### **4.5.1 FORM AND RETENTION**

Records should be in a place, form and manner that will permit an Inspector or Safety Office personnel to examine them. Records must be maintained for a minimum of two (2) years from the date of the making of the record even if the related license has expired or has been terminated.

### **4.5.2 RECEIPT RECORDS**

Records of receipt of any cannabis shall include:

- Name and address of the person/organization where the cannabis was from
- Address of location at which it was received
- Date received
- Quantity received (e.g., number of containers and quantity per container, number of plants, number/weight of seeds, etc.)
- Name/description of cannabis material including brand name if applicable
- Lot or batch number if known
- Form of the cannabis containing drug and its strength per unit if applicable

- Intended use

See Appendix A for a suitable format to use to develop receipt records.

### **4.5.3 USAGE RECORDS**

Usage records for any cannabis that is being used must include the following information:

- Lot/batch number or sample identifier as applicable
- Particulars of use including description of use, patient and/or project identifier as applicable
- Amount used
- Amount remaining
- Identity of the person using the cannabis (legibly printed name and signature)

See Appendix B for an example of a suitable format to use for a usage record.

### **4.5.4 DESTRUCTION RECORDS**

Destruction records must be kept for any cannabis that is destroyed. Records must include:

- Description of cannabis including brand name (if applicable)
- Date of destruction and its pre-destruction net weight (or volume as applicable)
- Address at which the cannabis is destroyed
- Brief description of destruction method
- Names of individuals who witness destruction and their role allowing them to witness such destruction
- Signed and dated statement by two witnesses stating:
  - That they witnessed the destruction
  - That the cannabis was destroyed in accordance with approved method.

See Appendix C to view a suitable format for a destruction record.

## **5.0 REPORTING AND RECORDS – EXCISE ACT**

If research involves the growth or cultivation of cannabis plants or production of cannabis oils or concentrates, monthly reporting to Canada Revenue Agency (CRA) will be required under the University's Cannabis License. This will first require the research premises to be added to the license, inclusion of the destruction method to be used and may require an on-site inspection by CRA.



The information to be reported is found on the [monthly reporting form](#). This information must be submitted to the Manager, Research Risk by the 2<sup>nd</sup> Friday of the month following the end of the reporting period so it can be collated with records from other University research projects (as applicable) and provided to the CRA in accordance with the University Cannabis License.

**PLEASE NOTE – Due to this and other requirements, growth and cultivation of plants; or production of cannabis oils is currently prohibited on University campuses.**

**6.0 APPENDIX A: EXAMPLE OF A SUITABLE RECEIPT RECORD**  
**CANNABIS RECEIPT RECORD**

Name of supplier:

Address of the supplier:

Name of receiver:

License number:

**CANNABIS**

Date received:

Address where cannabis was received:

Storage location (Building and room):

Description of cannabis material:

Brand name if applicable:

Intended use:

Lot/batch number	Net weight or volume (if liquid) received	For cannabis containing drug, indicate form and strength per unit <input type="checkbox"/> Not applicable

\*Maintain all original documentation accompanying shipment.

## 7.0 APPENDIX B: EXAMPLE OF A SUITABLE USAGE AND TRANSFER LOG

### CANNABIS USAGE AND TRANSFER LOG

Principal Investigator name:

Description/name of cannabis:

Lot number/batch number or sample ID:

Date produced (optional field if produced within the research project at the University):

Identifier of cannabis from which the oil/extract was produced (optional field if form is used to track usage of an extract/oil):

Net starting weight/volume of cannabis:

Date of use	Description of Use	Patient or project ID	Quantity Used	Quantity Remaining	Used by (printed name)	Used by (signature)

A separate form is to be completed for each container.

\*Produced - cultured, dried, synthesized, extracted, or sown. Refer to the Section 4.2 in the Guideline for further information.

## 8.0 APPENDIX C: EXAMPLE OF A SUITABLE DESTRUCTION RECORD

### DESCRIPTION OF DESTRUCTION METHOD

- Plant material - Autoclaved and mixed with soil and/or culture media.
- Plant material – Ground and mixed with at least equal part of other materials. Indicate what other materials used:
- Other – Mixed with liquid soap and absorbed with solid absorbent.

SOP used for destruction:

### DESTRUCTION

Description of samples destroyed, including brand name if applicable:

Location (address) of destruction:

Samples destroyed:

Sample identification number	Net weight or volume (if liquid) prior to destruction

### WITNESSES

I, the undersigned, certify that I am an employee of the University of Waterloo and that I have witnessed the destruction of the cannabis described above as per the method described above.

Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_