

Policy Title:	Management of Cannabis & Cannabis Products for Scientific Purposes
Policy Number:	EHS-032019-001
Office Responsible:	Health & Safety
Executive Responsible:	Vice-President, Human Resources
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1.0 POLICY STATEMENT

The University of Windsor is committed to ensuring that activities with cannabis or any class of cannabis are compliant with applicable laws and regulations and conducted appropriately within our research and academic studies. This policy outlines how these items are to be acquired, stored, used, and disposed across all academic, research, and administrative areas.

2.0 PURPOSE

The purpose of this policy is to ensure a consistent approach to the prescribed requirements for cannabis or any class of cannabis while publicizing the University's requirements for operational due diligence and stewardship. This policy does not apply to the use of recreational cannabis.

3.0 SCOPE

This policy applies to all academic, administrative, and research units within the University of Windsor.

4.0 EXCEPTIONS TO THE POLICY

None.

5.0 CROSS-REFERENCES

- Cannabis Act
- Cannabis Regulations (SOR2018-144)
- Cannabis Tracking System Order (SOR2018-178)
- Controlled Drugs and Substances Act Narcotic Control Regulations
- Food and Drugs Act
- Food and Drug Regulations
- Natural Health Products Regulations Health of Animals Act
- Health of Animals Regulations Canadian Environmental Protection Act

EHS-032019-002 Application to Use Cannabis for Scientific Purposes

EHS-032019-003 Cannabis Order Form

EPS-2009-05 Substance Disposal Form

CCC-2020-05 Reporting and Recording Suspicious Transactions

CCC-2020-06 Suspicious Transaction Reporting Form

6.0 DEFINITIONS

Cannabis:

A cannabis plant and any part of a cannabis plant, including the phytocannabinoids produced by, or found in, such a plant, regardless of whether that part has been processed or not other than a part of the plant referred to in [Schedule 2](#). Any substance or mixture of substances that contains or has on it any part of such a plant and any substance that is identical to any phytocannabinoid produced by, or found in, such a plant, regardless of how the substance was obtained.

Cannabis non-solid concentrates:

Substances that are in non-solid form at a temperature of $22 \pm 2^{\circ}\text{C}$ and that have a maximum yield percentage of greater than 3% w/w of THC (see definition below), taking into account the potential to convert THCA into THC.

Cannabis oil:

An oil that contains anything referred to in item 1 or 3 of [Schedule 1](#) to the Cannabis Act and that is in liquid form at a temperature of $22 \pm 2^{\circ}\text{C}$.

Cannabis solid concentrates:

Substances that are in solid form at a temperature of $22 \pm 2^{\circ}\text{C}$ and that have a maximum yield percentage of greater than 3% w/w of THC, taking into account the potential to convert THCA into THC.

Fresh cannabis:

Freshly harvested cannabis buds and leaves, but does not include plant material that can be used to propagate cannabis.

Cannabis Research Licence: A licence to conduct research activities involving cannabis and other cannabis products.

Cannabis product:

Cannabis of only one of the classes that are set out in [Schedule 4](#) to the Cannabis Act — or a cannabis accessory if that accessory contains such cannabis — after it has been packaged and labelled for sale to a consumer at the retail level, but does not include a drug containing cannabis.

CBD: cannabidiol.

CBDA: cannabidiolic acid.

Controlled Drug:

A drug set out in the Schedule to the Food and Drug Regulations, Part G – Controlled Drugs.

Controlled substance:

A substance included in Schedule I, II, III, IV, or V of the Controlled Drugs and Substances Act; includes any substance that contains a controlled substance natural or synthetic.

Drug:

Any substance or mixture of substances manufactured, sold or presented for use in:

- a) the diagnosis, treatment, mitigation or prevention of disease, disorder, or abnormal physical state, or its symptoms, in human beings or animals;
- b) restoring, correcting or modifying organic functions in human beings or animals;
- c) Disinfection in premises where food is manufactured prepared or kept.

Experimental study:

A limited test of a new drug in animals carried out by an investigator.

Lot number:

Any combination of letters or figures by which a product may be traced in manufacture and identified in distribution.

Narcotic:

Any substance set out in the Schedule to the Narcotic Control Regulations (Schedule I) or anything that contains any substance set out in the Schedule.

See laws.justice.gc.ca/en/C-38.8/C.R.C.-c.1041/index.

Pharmacist

A person who is registered and entitled under the laws of a province to practice pharmacy and to operate a pharmacy or dispensary.

Qualified Person in Charge (QPIC)

A person who has overall responsibility for the management of an Interim licensed dealer's operation pertaining to activities involving controlled drugs and substances. The Environmental Health & Safety Manager is the University of Windsor's QPIC.

Practitioner

A person who is authorized under the laws of a province to practice in that province the profession of medicine, dentistry or veterinary medicine, and includes any other person or class of persons prescribed as a practitioner; pursuant to Food and Drug Regulations, Part G, Division 4, practitioners may administer controlled drugs to patients under their professional treatments.

Prescription

An authorization given by a practitioner that a stated amount of a specified controlled drug be dispensed for the person named therein.

Prescription drug:

A drug

- (a) that contains cannabis;
- (b) that is a prescription drug, as defined in section A.01.010 of the [Food and Drug Regulations](#);
- (c) for which a drug identification number has been assigned under subsection C.01.014.2(1) of the [Food and Drug Regulations](#).

Security clearance:

Except in paragraph 53(2)(g), a security clearance granted by the Minister under section 67 of the Cannabis Act and includes, for the purpose of paragraph 53(2)(e), a security clearance granted under section 112 of the former [Access to Cannabis for Medical Purposes Regulations](#)

THC: delta-9-tetrahydrocannabinol.

THCA: delta-9-tetrahydrocannabinolic acid.

7.0 PROCEDURE

7.1 Authorized Individuals

1. Only those persons authorized by the University pursuant to the Cannabis Act and Regulations shall have authority to possess, care and control of cannabis substances namely:
 - a. Qualified Person In Charge (QPIC);
 - b. Chemical Control Centre Staff under the direction and supervision of the QPIC;
 - c. Practitioners who require cannabis substances for patient treatment;
 - d. Campus Community Police special constables acting in an enforcement capacity;
 - e. Persons granted a certificate to use cannabis substances for Scientific Purposes and/or Experimental (Clinical) Studies based upon applications endorsed by the University of Windsor's QPIC (e.g., veterinarians and/or investigators needing controlled substances for field or laboratory work; clinical trials of drugs and/or new drugs in animals).
2. No person shall possess a cannabis substance unless licensed and authorized under the Cannabis Act & Regulations and has a valid University of Windsor Certificate to Use Cannabis.
3. Except as authorized under the Cannabis Act and Regulations, no person shall import into Canada or export from Canada a cannabis substance. No person shall possess a cannabis substance for the purpose of exporting it.
4. Except as authorized, no person shall produce, sell or transfer a cannabis substance.
5. The person in charge of a place entered by an internal or external inspector or peace officer and every person there shall give the Inspector or peace officer all reasonable assistance in the power of that person and shall furnish the Inspector or peace officer with such information as may reasonably be required.
6. No person shall knowingly make any false or misleading statement verbally or in writing to an inspector or peace officer. No person shall obstruct an internal or external inspector or peace officer who is engaged in the performance of his/her prescribed duties.
7. No person shall knowingly make, or participate in, or assent to or acquiesce in the making of a false or misleading statement in any book, record, return or other prescribed document however recorded.

7.2 End-User Responsibilities

1. A practitioner and/or principal Investigator wishing to conduct activities with Cannabis for scientific purposes must read and be familiar with this policy.
2. A practitioner and/or principal Investigator wishing to conduct activities with Cannabis for scientific purposes must complete an ["application to use cannabis for scientific purposes"](#). The completed form must be co-signed by the applicable Department Head and Dean. The completed and signed form must be sent to the Institutions QPIC (EHS Manager) for review and license amendment certificate approval.
3. A practitioner and/or principal investigator shall: complete a Cannabis Substance Order

Form (CCC-2019-02) have it co-signed by QPIC. This form, necessary for billing and audit purposes, is available from the Chemical Control Centre or found on-line at www.uwindsor.ca/ccc. The order will not be process without a valid certificate.

4. Maintain records of cannabis substances as prescribed by regulations within the institution's Hazardous Materials Information System (HMIS), including the date received, the name and quantity of cannabis substance, the name and address of the person from whom the drug was received, the particulars of use, the running balance, and the return of any quantity to the Chemical Control Centre for disposal. The records maintained within HMIS will be used as the institution's official records and shall be made readily available to internal and external inspectors or peace officers to obtain information, and shall be retained for at least seven years from the date of entry of the record. For more information, visit www.uwindsor.ca/hmis.
5. Take adequate steps to contain, protect and secure all cannabis substances, against spill, loss or theft in accordance with the regulations (e.g., store in a locked safe, drawer, cabinet or lockable refrigerator set between 2 and 8 degrees Celsius);
6. Seek permission from the institution's QPIC to relocate the secure storage of cannabis substances, from any location previously identified and approved;
7. Notify the QPIC of their extended absence, greater than three (3) months, from the University and to make alternate arrangements for possession and safekeeping of their cannabis substances;
8. Report any spill, loss or theft of a cannabis substance to the Departmental Chair or Dean and to the QPIC immediately after the discovery of the spill, loss or theft (CCC- 2009-03);
9. Report and record any suspicious transactions to the Office of Controlled Substances, Health Canada as prescribed within 72 hours of the discovery;
10. Submit annually an inventory of cannabis substances, under his/her care and custody (e.g., names of cannabis substances, balances, secure locations) to the QPIC;
11. Permit the QPIC (or designate), Departmental Chair or Dean, Inspector or peace officer to audit all records and stocks of cannabis substances under the practitioner's or principal investigator's care and custody;
12. Consult with the QPIC, University Staff Veterinarian and Research Ethics Chair about proposed work with cannabis substances to be used in investigational (experimental) veterinary drugs or new human drugs, and about new substance notifications and permit applications to federal agencies;
13. Consult with the QPIC and Research Ethics Board about proposed work with cannabis substances to be used in studies with human participants.
14. Upon completion of a teaching or research program, immediately return all unused cannabis substances, to the Chemical Control Centre for authorized disposition or destruction (EPS-2009-05).

7.3 Administration

The Chemical Control Centre, under the authorization and supervision of the institution's QPIC shall, on behalf of the University of Windsor be responsible for the administration of the institution's Cannabis Management program, including:

1. Assist QPIC with orders, receiving, storage and dispense to authorized persons and dispose of all cannabis substances, used in University teaching and research programs and clinical activities;
2. maintain prescribed records concerning the receipt of cannabis substances from all licensed

- dealers providing such substances to the University for sanctioned teaching, research and clinical purposes;
3. maintain records for at least seven years from the date of the making of the record;
 4. appropriately label and issue cannabis substances to practitioners and principal investigators for sanctioned teaching, research and clinical purposes;
 5. stipulate requirements for responsible care and secure custody of controlled drugs and substances and veterinary biologics and shall require that all unused product be returned to the Chemical Control Centre for destruction;
 6. take reasonable precautions to determine that persons are authorized under prescribed regulations to possess cannabis substances such as verifications of identification and signatures, confirming licensure with the College of Veterinarians of Ontario;
 7. maintain prescribed records concerning cannabis substances dispensed to authorized persons from the Chemical Control Centre;
 8. take all reasonable steps that are necessary to protect and secure all cannabis substances under care and custody against spill, loss or theft;
 9. report any loss or theft of cannabis substances to the Health Canada, as prescribed in the Cannabis Act & Regulations. (CCC-2009-03);
 10. Report and record any suspicious transactions to the Office of Controlled Substances, Health Canada as prescribed within 72 hours of the discovery;
 11. advise the Vice-President Research and Innovation, Vice-President Human Resources and the Director of Campus Community Police about any extra-ordinary cannabis drug-related situation concerning safety, security or regulatory non-compliance; and
 12. Prepare an annual report concerning the use of cannabis substances at the University, which summarizes noteworthy compliance issues and enforcement actions.

If requested, an *ad hoc* peer review committee shall be convened by the Vice-President Research and Innovation and/or Vice-President Human Resources to advise about extraordinary issues related to the management and use of controlled drugs and substances.

Authority to enforce compliance with University of Windsor and prescribed requirements ultimately resides with the Vice-President Human Resources.

7.4 Disposal of Cannabis

Unwanted cannabis substances including liquid, powder, tablet or injectable preparations, must be reported to the QPIC and returned to the Chemical Control Centre for proper disposal (EPS-2009-05). The institution's HMIS inventory records shall be annotated to indicate the disposal. Unwanted biologics must be disposed of as hazardous waste through services provided by Chemical Control Centre. Empty bottles, vials, syringes and sharps must be collected in University standard (red or yellow) sharps collectors that are also disposed via the Chemical Control Centre.

Chemical Control Centre
Essex Hall B37

Phone: (519) 253-3000 ext. 3523
Fax: (519) 973-7013
Email: ccc@uwindsor.ca
Website: www.uwindsor.ca/ccc

8.0 CONTACT INFORMATION

For more information on the University of Windsor's management of Cannabis Substances, please contact:

EHS Manager
Health & Safety
500 CHT

Phone: 519.253.3000.2055
Fax: 519.971.3671
email: smenard@uwindsor.ca
www: www.uwindsor.ca/ccc

Appendices

Canadian Council on Animal Care (CCAC)

The Canadian Council on Animal Care (CCAC) Guide to the Care and Use of Experimental Animals, chapters X, XI and XII, addresses the subjects of pain control in animals, anesthesia and euthanasia.

www.ccac.ca/en/CCAC_Programs/Guidelines_Policies/GUIDES/ENGLISH/toc_v1.htm

The Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans (TCPS or the Policy) is a joint policy of Canada's three federal research agencies – the Canadian Institutes of Health Research (CIHR), the Natural Sciences and Engineering Research Council of Canada (NSERC), and the Social Sciences and Humanities Research Council of Canada (SSHRC), or "the Agencies."

<http://www.pre.ethics.gc.ca/eng/policy-politique/initiatives/tcps2-eptc2/Default/>

<https://www.uwindsor.ca/research-ethics-board/309/tri-council-policy-statement-2>

Extra-Label Drug Use

Numerous risk issues are associated with extra-label drug use (ELDU) in animals. These issues are explored at: www.hc-sc.gc.ca/dhp-mps/vet/label-etiquet/index-eng.php

Health Canada's Drug Product Database (DPD)

Health Canada's Drug Product Database (DPD) contains specific information on all drugs approved for use in Canada. The DPD includes human pharmaceutical and biological drugs, veterinary drugs and disinfectant products.

www.hc-sc.gc.ca/dhp-mps/prodpharma/databasdon/index-eng.php/

Health Products and Food Branch

The Health Products and Food Branch (HPFB) Inspectorate of Health Canada is responsible for compliance and enforcement activities pursuant to the *Controlled Drugs and Substances Act* (CDSA) and the *Food and Drugs Act*. www.hc-sc.gc.ca/ahc-asc/branch-dirgen/hpfb-dgpsa/index-eng.php

Healthy Environments and Consumer Safety Branch (HECSB)

The possession, import, export, production, distribution and sale of narcotics, controlled drugs, targeted substances and precursor chemicals are all subject to legislated controls for public health and safety. Canada's Drug Strategy and Controlled Substances Program falls within the Healthy Environments and Consumer Safety Branch (HECSB) of Health Canada.

Investigational New Drugs – Experimental Studies Certificates

The Veterinary Drugs Directorate issues Experimental Studies Certificates to researchers who undertake clinical evaluations of new drugs. Principal investigators must apply to the VDD. The Institution's

QPIC must be consulted about any Application to VDD for an Experimental Studies Certificate for a Veterinary Drug; a copy of the Application must also be forwarded to the Chemical Control Centre.

Natural Health Products

Natural health products are regulated by the *Natural Health Products Regulations* pursuant to the *Food and Drugs Act*. The regulations apply only to human products; they include substances or medicinal ingredient substances set out in Schedule 1 of the Regulations, but not substances set out in Schedule 2.

Natural health products are identified with a natural products number (NPN) or a DIN-HM number which designates the product as a Homeopathic Medicine approved by Health Canada. The University's Research Ethics Board must approve research involving natural health products and human subjects.

Licensed cultivators, processors and sellers of cannabis under the Cannabis Act

A federal licence is required to cultivate, process and sell cannabis for medical or non-medical purposes. Individuals who are authorized by a health care professional can register to buy products from holders of a licence for sale for medical purposes. Learn more about accessing cannabis for medical purposes.

<https://www.canada.ca/en/health-canada/services/drugs-medication/cannabis/industry-licensees-applicants/licensed-cultivators-processors-sellers.html>

[Cannabis Act \(Police Enforcement\) Regulations](#) (SOR/2018-151)

[Cannabis Fees Order](#) (SOR/2018-198)

[Industrial Hemp Regulations](#) (SOR/2018-145)

[Order Designating the Minister of Border Security and Organized Crime Reduction, a member of the Queen's Privy Council for Canada, as the Minister for the purposes of the Cannabis Act](#) (SI/2018-103)

[Qualifications for Designation as Analyst Regulations \(Cannabis\)](#) (SOR/2018-146)