

Appendix: Summary for Licensed Sellers of Cannabis for Medical Purposes: Regulations Amending the Cannabis Regulations (Additional Period of Validity of a Medical Document)

Who this amendment applies to:

- This amendment will enable you to continue to sell to, register, or amend the registration document of any client registered with you who has a registration document that has or will expire between March 13, 2020 and September 30, 2020.
- Patients who can safely access their health care practitioner during this time should be encouraged to do so.

What the amendment does:

- This amendment came into force on June 26, 2020.
- Registration documents that expired between March 13, 2020 and June 25, 2020 have been extended for six months beginning on the day this amendment came into force (i.e., they are extended until December 26, 2020).
- Registration documents that expire between June 26, 2020 and September 30, 2020 will be extended for six months beginning on the day after their expiry (e.g., if a registration document expired on August 1, 2020, it will be extended until February 2, 2021).
 - If a registration document expires close to the end of a month (e.g., August 30, 2020) and the month that is six months ahead does not have the same number of days, the expiry will be set as the last day of that month (e.g., if a registration expires on August 30, 2020, it will be extended until February 28, 2021).
- This amendment does not require you to take any additional steps in order to continue to sell cannabis to clients to whom this amendment applies, if they are registered with you (this includes clients whose registration documents expired between March 13, 2020 and June 25, 2020). However, it is recommended that you assess your reporting and sales systems and make any updates necessary in order to ensure that you are able to:
 - continue to fulfill sale orders for clients to whom this amendment may apply;
 - continue to meet all of the reporting provisions set out in the *Cannabis Regulations* which apply to you; and
 - continue to meet all of the record keeping requirements set out in the *Cannabis Regulations* which apply to you.
- After September 30, 2020, if a client's registration document expires and they wish to remain registered with a licensed seller, they will be required to have a valid medical document.

Examples of how this regulatory amendment will apply:

The following examples provide guidance on how this amendment could apply in a number of different scenarios.

Existing registered clients: Any client whose registration expires between March 13, 2020 and September 30, 2020 are considered registered with you and they may continue accessing cannabis for medical purposes under their current registration and medical document. This amendment does not require a client whose registration expires between March 13, 2020 and September 30, 2020 to renew their registration. Similarly, you will not be required to issue a new registration document with the new extended expiry date.

In order to continue to meet your clients' needs and to comply with the necessary provisions of the *Cannabis Regulations*, you may choose to update your data management systems. This may include updating either the expiry date of the client's registration, or the validity period of their medical document. Do not alter a client's original registration date with you; this information is important to maintain, especially in the case of patients who wish to transfer to another licence holder.

Again, no registration application from the client is needed to do this and you do not need to send an updated registration document to them.

Existing registered clients with a new medical document: Existing clients who are able to consult their health care practitioner and obtain a new medical document should be encouraged to do so. If they seek to register based on a new medical document, they will be required to register with you as per section 279 of the *Cannabis Regulations*. If the client's new registration expires before September 30, 2020, this regulatory amendment will apply and the new extended expiry date should be issued on their new registration document.

Clients who request an amendment to their registration: Clients will be permitted to amend their registration as per usual. If they wish to amend their registration for a reason which typically requires a new medical document (i.e. to increase the daily authorized amount of cannabis), they must obtain a new medical document to do so. If a new registration document is issued, and this amendment applies to that client, the new extended expiry date should be provided on it.

Clients who transfer from another licensed seller or the Minister: Clients will continue to be permitted to transfer their medical document from one licensed seller to another, or register with a licensed seller on the basis of their registration certificate with the Minister. In this case, if you issue a new registration document, and this amendment applies to that client, the new extended expiry date should be provided on it.

New clients: If an individual is able to consult their health care practitioner and obtain a medical document, they should register with you as per section 279. If it is determined during the application process that the registration will expire before September 30, 2020, this amendment will apply and the extended expiry date should be issued on their registration document.

Requirements within the *Cannabis Regulations* that remain unchanged

- All requirements for retention of records are unchanged.
- You must still honour all requests for cancellations (paragraph 286(1)(a) or (e)) or transfers (subsection 287(1)).
- You must still honour all withdrawals of consent received from a health care practitioner per subsection 280(2).
- When transferring or returning a medical document, you must still list the date on which the client was registered on the medical document per section 288.
- Reporting requirements in section 297 still apply, and clients registered using the extended validity period count as "valid" registered clients for all purposes.
- You may not sell cannabis to, or extend the validity period of a client's medical document, to those whose registrations have expired outside of the period of this amendment (i.e. those with

a registration document that expires on or before March 12, 2020 or on or after October 1, 2020).

- You may not issue a registration document to a client who is not currently registered with you without a registration application per section 279.