# **CANNABIS TRACKING SYSTEM**

**Monthly Reporting Guide** 



du Canada



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#### Disclaimer

This document should be read in conjunction with relevant sections of the *Cannabis Act*, its Regulations and the Cannabis Tracking System Order. In the case of discrepancy between this document and the *Cannabis Act*, its Regulations or the Order, the latter shall prevail.

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**Important:** This document is version 3 of the monthly reporting guide. It contains new information and also merges the two previous guides — one for federal licence holders and one for provinces and territories — into one.

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# 1.0 Purpose

This guide provides federal licence holders and provincially and territorially authorized distributors and retailers with information to help them complete and submit their monthly reports — a cannabis tracking report and, if applicable, a health care practitioners report — to Health Canada, as required under the *Cannabis Act*, its Regulations and the Cannabis Tracking System Order.

Health Canada has other guidance documents and information that may be used in conjunction with this guide. Refer to the <u>Cannabis Tracking System (CTS) Resources</u> webpage for additional resources and updates to this guide.

# 2.0 Background

The *Cannabis Act* and its Regulations provide, among other things, the framework to provide access to cannabis and to control and regulate its production, distribution and sale.

The oversight of the cannabis supply chain is a shared responsibility across many federal departments, provincial and territorial departments, industry and other stakeholders. One of Health Canada's responsibilities is to track the flow of cannabis as a means of preventing the illegal inversion and diversion of cannabis into and out of the regulated commercial system.

On September 5, 2018, the Cannabis Tracking System Order was published in the *Canada Gazette*, Part II. The Order, which requires the provision of information from reporting parties, came into force on October 17, 2018. On June 26, 2019, a new Order was published in the *Canada Gazette*, Part II. It continues to support the objective of tracking the high-level movement of cannabis throughout the supply chain, including the tracking of the new classes of cannabis authorized under the *Regulations Amending the Cannabis Regulations (New Classes of Cannabis)*. The new Order is effective as of October 17, 2019.

## 3.0 Scope

This guide applies to the following groups who are required to submit monthly reports:

- Licensed cultivators (including micro, standard or nursery)
- Licensed processors (including micro or standard)
- Licensed sellers of cannabis for medical purposes
- Provincial or territorial CTS reporting authorities
- Provincially or territorially authorized distributors
- Provincially or territorially authorized retailers



**Important:** Private distributors and retailers are required to report to their provincial or territorial authority which then submits the information to Health Canada. The provincial or territorial authority may have additional reporting requirements. A list of provincial or territorial authorities may be found at Cannabis Tracking System Resources webpage.

# 4.0 Setting up: Before submitting monthly reports

Each individual who is required to submit monthly reports (the reporter) should be familiar with the knowledge areas listed in <u>section 4.1</u>, so they can comply with the *Cannabis Act*, its Regulations and the Cannabis Tracking System Order.

In addition, each reporter must complete the actions outlined in <u>section 4.2</u>, and sections  $\underline{4.3}$  and  $\underline{4.4}$  as applicable, before they can start submitting monthly reports.

## 4.1 General knowledge areas

The reporter should be familiar with the following:

Key knowledge areas	Notes and references
The Cannabis Act and its Regulations	Links may be found on <u>Health Canada's website</u>
Cannabis Tracking System Order	Reporters are responsible for ensuring compliance with the Cannabis Tracking System Order

#### 4.2 CTLS account creation

Monthly reports must be submitted through the Cannabis Tracking and Licensing System (CTLS). This is the web-based application that is also used to apply for a federal cannabis licence.

Each reporter must be registered in the CTLS and know how to use it. For more information, refer to the CTLS Getting Started Guide.

## 4.3 Obtaining reporting level access — Federal licence holders

Reporters must obtain reporting level access in the CTLS. This level is initially granted to the individual named as the responsible person for the licence. It occurs automatically once a valid security clearance is granted and the licence is issued.

The CTLS now allows the responsible person for each licence to delegate and revoke reporting level access to security-cleared employees. These processes are explained below.

#### 4.3.1 Managing reporting level access for security-cleared employees

The responsible person should follow the steps below to grant reporting level access to a maximum of ten security-cleared employees. Once access is granted, these individuals may

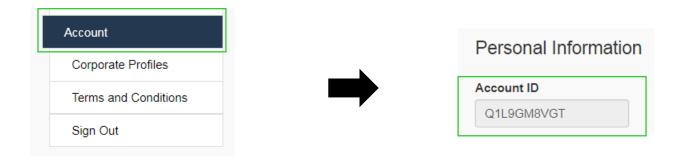
submit reports on behalf of the licence holder. They only have access to the reporting section of the CTLS.



**Important:** The licence holder's responsible person remains accountable for the timely submission of reports and the accuracy and completeness of data.

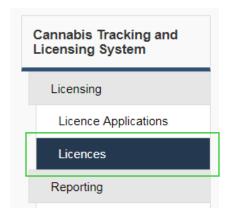
Employees must have a CTLS account to be granted reporting level access. The responsible person will need the employee's CTLS Account ID to identify in the CTLS who is being granted reporting level access.

The employee can find their Account ID by logging into the CTLS and clicking on the Account button on the left-hand menu:



#### 4.3.1.1 Granting reporting level access

Once the employee's Account ID has been obtained, the responsible person can log into the CTLS to begin the process of granting reporting level access. Click the Licences button on the left-hand menu:



On the Licences page, click the Manage icon under the Actions heading:

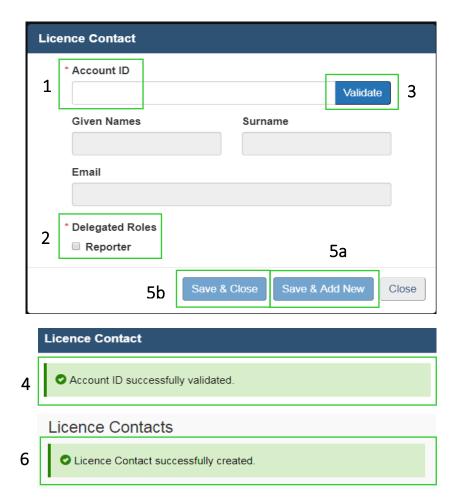


On the Manage Licence page, click New Licence Contact under the Licence Contacts heading:



The Licence Contact window will appear. Enter the employee's CTLS Account ID (1). Next, select Reporter under Delegated Roles (2) and click Validate (3). The Given Names, Surname, and Email fields will auto-populate with information from the employee's CTLS profile. A message confirming that the Account ID has been validated will appear (4).

To grant reporting level access to another employee, click Save & Add New (5a) and repeat the previous steps. Otherwise, click Save & Close (5b) and the Manage Licence page will appear with a message confirming the creation of the Licence Contact (6). This employee can now submit monthly reports on behalf of the licence holder.



#### 4.3.1.2 Revoking reporting level access

As the responsible person, log into the CTLS and click the Licences button on the left-hand menu:



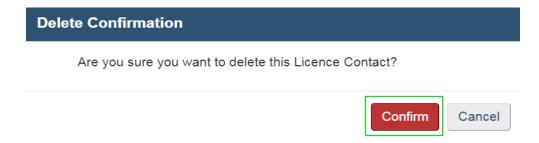
On the Licences page, click the Manage icon under the Actions heading:



In the Licence Contacts list on the Manage Licence page, find the name of the employee whose reporting level access is to be revoked. Under the Actions heading, click the Delete button that appears on the same row as the employee's name:



The Delete Confirmation window will appear, asking for confirmation that this contact is to be deleted. Click Confirm. The employee's reporting level access is now revoked and they will no longer able to submit reports on behalf of the licence holder.



# 4.4 Obtaining reporting level access — provincial and territorial authorities



**Tip:** Section 4.4 applies only to provincial and territorial authorities. Private retailers must consult with the licensing body in their jurisdiction for specifics regarding the reporting process.

Reporting level access in the CTLS may be requested for up to four individuals associated with a provincial or territorial reporting authority. Access can be requested by emailing <a href="https://example.com/hc.ctls-bi-sscdl-ie.sc@canada.ca">hc.ctls-bi-sscdl-ie.sc@canada.ca</a>. Put Reporting Level Access Request in the subject line.

In the body of the email, include the full name of the person(s) who require access and the province or territory for which reports will be submitted. A Health Canada officer will reply with a request to complete a reporting level access request form. Once the required information is submitted via the form and Health Canada verifies the information, the person(s) will be informed that their access level has been changed and they can then begin reporting for the assigned province or territory.

To revoke an individual's reporting level access, email <a href="https://hc.ctls-bi-sscdl-ie.sc@canada.ca">hc.ctls-bi-sscdl-ie.sc@canada.ca</a> with Reporting Level Access Revocation in the subject line. In the body of the email, include the individual's name and Account ID. Health Canada will initiate the process to revoke reporting level access for this person and, once this is complete, will contact an appropriate representative from the provincial or territorial authority to confirm.

# 5.0 How to submit a report



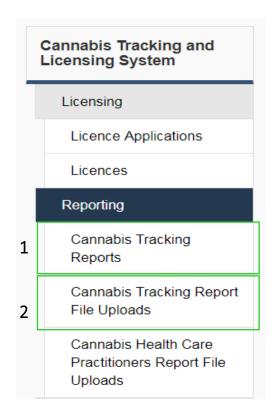
**Important:** Reports submitted in the CTS must conform exactly to the specifications prescribed by the system. Failure to meet these specifications will result in an error and reports will not be able to be submitted.

Refer to the <u>cannabis tracking reports tool</u> described in <u>section 5.1.2.1</u> for guidance and information about each field in the report.

## 5.1 Cannabis tracking reports

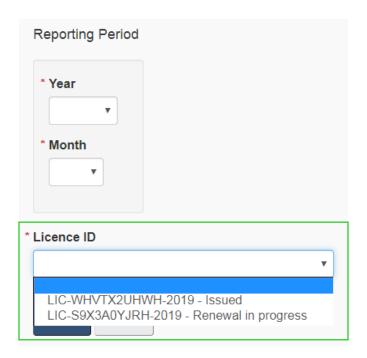
Individual cannabis tracking reports must be submitted for each licensed site and for each authorized distributor and retailer. Reporters may choose from one of two methods, whichever they prefer, each month. The reporting methods are:

- 5.1.1 Manual entry > Click on Cannabis Tracking Reports, shown as (1) in the diagram below
  - or
- 5.2.1 **File upload** > Click on Cannabis Tracking Report File Uploads, shown as (2) in the diagram below



#### 5.1.1 Manual entry

Manual entry requires reporters to enter data directly into the CTS. Only one site can be reported on at a time. Under Licence ID, licence holders who choose this option should select the site to be reported on from a list of licence numbers associated with their account:



When provincial or territorial authorities choose manual entry, the Province or Territory field (1) will be pre-populated based on their CTLS account. However, they are required to input the site ID (2) associated with the retail or distribution location for which they are reporting.



#### 5.1.2 File upload

The upload option allows reporters to submit reports using a .csv file. The .csv forms for licence holders and for provincial and territorial authorities can be found <u>here</u>.

#### 5.1.2.1 Cannabis tracking reports tool

A tool has been developed to help reporters prepare and submit their monthly cannabis tracking report in the correct form. The tool can be found <a href="here">here</a>. It is not a replacement or a substitute for the .csv form. Rather, it can be used to populate the .csv file which should then be saved separately and uploaded to the CTS.

Refer to section 7.0 for an overview and description of all reporting fields.



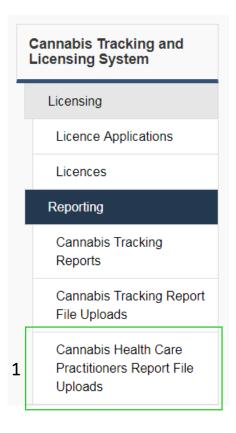
**Tip:** An organization with multiple licensed sites can upload all of its individual reports in a single .csv file. Similarly, a single .csv file can be uploaded for all distribution and retail locations in a province or territory. In both cases, each location's information must be indicated on a separate row of data. Each row of data reflects an individual report within the .csv file.

## 5.2 Health care practitioners report



**Tip:** Only holders of a licence to sell cannabis for medical purposes who registered clients during the reporting period are required to submit health care practitioners reports.

Holders of a licence to sell cannabis for medical purposes are also required to submit monthly health care practitioners reports (1) that list information about each health care practitioner associated with all new and renewed client registrations during the reporting period. These reports must be submitted via .csv upload in the CTS and are separate from the cannabis tracking reports. The .csv template form can be found here.



If no clients were registered during the reporting period, a health care practitioners report is not required. Refer to <u>section 7.8</u> for an overview and description of the reporting fields associated with the health care practitioners report.



**Important:** The unique ID field in the health care practitioners report refers to the health care practitioner's provincial or territorial medical licence number. It should be recorded as it appears on the client's medical document and without any formatting (e.g., spaces or dashes) or additional text that the company uses.

## 6.0 What's new?

The CTS has been modified to align with amendments to the regulatory framework (i.e., the *Regulations Amending the Cannabis Regulations (New Classes of Cannabis)*) as well as user feedback on the system. These changes are summarized below.

## 6.1 Unpackaged/packaged inventory

For clarity and to be consistent with Canada Revenue Agency reporting, the term "unfinished inventory," which refers to any cannabis held in stock by a cultivator or processor that is not packaged for sale to a consumer at the retail level, has been changed to "unpackaged inventory." This is referred to as "unpackaged cannabis" in the Order.

Similarly, the term "finished inventory," which refers to any cannabis held in stock by a cultivator, processor, distributor or retailer that is packaged for sale to a consumer at the retail level, has been changed to "packaged inventory." This is referred to as "cannabis products" in the Order.



**Important:** Unpackaged inventory must be reported in kilograms for all classes and sub-classes of cannabis, except in the case of plants. Vegetative and whole cannabis plants are generally to be reported in number of plants; however, when reporting on adjustment for drying/processing loss (e.g., live trimmings), report in kilograms. This weight is not to be included in the calculation of closing inventory of plants.

Cannabis oil is no longer to be reported in litres and no longer appears as its own class of cannabis in the CTS. Cannabis oil should be reported as extracts – ingested, or edibles – non-solid if intended to be consumed as a beverage.

#### 6.1.1 Closing inventories

Reporters are required to explicitly report the end of month closing inventories for each class and sub-class of unpackaged and packaged cannabis. Closing inventory should equal the sum of opening inventory plus additions minus reductions. Closing inventory should also equal the next month's opening inventory.

#### 6.2 New classes of cannabis

Edible cannabis, cannabis extracts, and cannabis topicals have been added to Schedule 4 of the *Cannabis Act*. To enable the high-level tracking of these products throughout the supply chain, new classes of packaged and unpackaged cannabis have been added to the CTS.

Refer to section 7.7 for more information on the classes and sub-classes of cannabis.

#### 6.2.1 Definitions: Vegetative cannabis plant, whole cannabis plant

When reporting the number of cannabis plants moving in and out of unpackaged inventory, licence holders should classify them according to whether the plant is in a vegetative state or whether it is a whole cannabis plant.

A vegetative cannabis plant is a cannabis plant that is not budding or flowering while a whole cannabis plant is one that is budding or flowering.

### 6.3 Reporting dollar values

The new Cannabis Tracking System Order requires that Canadian dollar values, net of sales tax, be reported, similar to what was previously required to be reported to Statistics Canada. In the Cannabis Tracking System Order, this is referred to as book value. More specifically, dollar values are required to report closing inventories, sales of cannabis products, exports and intra-industry trade.

Health Canada shares the data it collects under the Order with Statistics Canada, as set out under an interdepartmental data-sharing Memorandum of Understanding. As such, parties subject to the Order will no longer be required to report information directly to Statistics Canada.

## 6.4 Number of cannabis products (packaged inventory)

All cannabis added to or removed from packaged inventory is to be reported in number of cannabis products. A cannabis product means cannabis of only one of the classes set out in Schedule 4 to the *Cannabis Act* — or a cannabis accessory that contains such cannabis — after it has been packaged and labelled for sale to a consumer at the retail level. End of month closing inventories of packaged cannabis are to be reported by total number of products, the estimated weight in kilograms of cannabis contained in those products (except for cannabis seeds and plants, which are to be reported by number of seeds and number of plants respectively), and the book value of the cannabis products, in Canadian dollars, net of sales tax.

## 6.5 Intra-industry trade

Holders of a licence for cultivation, a licence for processing or a licence for sale for medical purposes must report sales to other licence holders, broken down by province or territory of the receiver.

#### 6.6 Other new fields in the CTS

Holders of a licence to sell cannabis for medical purposes who are required to submit a health care practitioners report are required to include the postal code of the physical location where the health care practitioner practices.

Provincial and territorial authorities are required to include the name under which each authorized retailer and distributor is doing business (i.e., their company name) as well as the postal code for each physical location.

# 7.0 Understanding the CTS Reporting Fields

This section of the guide provides a description of all fields in the CTS so reporters understand what they are expected to report. The cannabis tracking reports tool, found <a href="here">here</a>, shows the exact formatting requirements for each field.

#### 7.1 General information

The general information section of the cannabis tracking report captures basic information about who is reporting and the reporting period.



**Important:** Reporting period refers to the year and month to which the information in the report relates. This is typically the month immediately preceding the month in which the report is submitted.

#### 7.1.1 For licence holders:

Field Name	Description
Reporting period year	The year of the reporting period. For .csv uploads, the year must appear on all rows for which there are data.
Reporting period month	The month of the reporting period. For .csv uploads, the month must appear on all rows for which there are data.
Licence number	The unique alpha-numeric identifier associated with a licence for cultivation, processing or medical sales. For .csv uploads, the licence number must appear on all rows for which there are data.

#### 7.1.2 For provincially or territorially authorized distributors and retailers:

Field Name	Description
Reporting period year	The year of the reporting period. For .csv uploads, the year must appear on all rows for which there are data.
Reporting period month	The month of the reporting period. For .csv uploads, the month must appear on all rows for which there are data.
Province or territory	The province or territory where the distributor or retailer is located.
Туре	Identify whether the report is being submitted by a retailer

	or a distributor. If both activities are conducted, identify as a distributor.  For .csv uploads, input 1 for a retailer or 2 for a distributor.
Company name	The name under which the distributor or retailer is doing business.
Site ID	The unique alpha-numeric identifier issued by the provincial or territorial authority to the distributor or retailer.
City	The city or municipality where the distributor or retailer is located.
Postal code	The postal code for the physical location where the retailer or distributor is located.

## 7.2 Unpackaged inventory

The unpackaged inventory section of the cannabis tracking report captures information about the physical flow of unpackaged cannabis into and out of a licensed site as well as how it is transformed into different classes of cannabis.



**Tip:** This section applies only to holders of a licence for cultivation or a licence for processing.



**Important:** Unpackaged inventory must be reported in kilograms for all classes and sub-classes of cannabis except in the case of plants. Vegetative and whole cannabis plants are generally to be reported in number of plants; however, when reporting on adjustment for drying/processing loss (e.g., live trimmings), report in kilograms. This weight is not to be included in the calculation of closing inventory of plants.

Field Name	Description
OPENING INVENTORY	
Opening inventory	The amount of unpackaged cannabis held in inventory at the site on the first day of the previous

	month.
ADDITIONS TO INVENTORY	
Quantity produced	The amount of cannabis produced at the site during the previous month.
Quantity received – domestic	The amount of unpackaged cannabis that was physically received from another licence holder in Canada, including all purchases and transfers other than returns.
Quantity received — imported	The amount of cannabis imported from outside Canada.
Quantity received – returned	The amount of unpackaged cannabis received as a result of a return from a consumer or from another licence holder.
Other additions	The amount of unpackaged cannabis received into inventory that is not captured by one of the categories above.
REDUCTIONS TO INVENTORY	
Quantity processed	The amount of cannabis that was used to produce another class of cannabis.
	For <b>pure intermediates</b> , there are additional fields in which you must specify the amounts used in the production of edible cannabis, cannabis extracts, and cannabis topicals.
Quantity packaged and labeled	The amount of cannabis that has been placed into final packaging for sale to a consumer at the retail level.
Quantity shipped — domestic — to analytical testers	The amount of unpackaged cannabis sent to holders of a licence for analytical testing for testing purposes.
Quantity shipped – domestic	The amount of unpackaged cannabis sent to holders

– to researchers	of a licence for research for research purposes.
Quantity shipped – domestic – to cultivators and processors	The amount of unpackaged cannabis sent to holders of a licence for cultivation or processing.
Quantity shipped — exported	The amount of cannabis exported outside of Canada.
Quantity shipped — exported value	The book value, in Canadian dollars and net of sales tax, of the cannabis exported outside of Canada.
Quantity shipped – returned	The amount of unpackaged cannabis sent back to a licence holder for refund or credit.
Adjustment for drying/processing loss	The loss in weight of cannabis due to drying or other normally accepted business activities (e.g., an extraction process).
	For plants, this is the weight of any trimmings, stalks, stems or other plant waste material that was removed from the live plant and destroyed.
Quantity destroyed	The amount of unpackaged cannabis that was destroyed.
Quantity lost/stolen	The amount of unpackaged cannabis that was lost, stolen or otherwise unaccounted for.
Other reductions	The amount of unpackaged cannabis removed from inventory not captured by one of the categories above.
CLOSING INVENTORY	
Closing inventory	The amount of unpackaged cannabis held in inventory at the site on the last day of the previous month.
Closing inventory value	The book value, in Canadian dollars and net of sales tax, of the unpackaged cannabis held in inventory at the site on the last day of the previous month.



**Important:** Closing inventory should equal the sum of opening inventory plus additions minus reductions. Closing inventory should equal the next month's opening inventory.

## 7.3 Packaged inventory

The packaged inventory section of the cannabis tracking report captures information about the physical flow of cannabis products (i.e., cannabis packaged for sale to a consumer at the retail level) into and out of a federally licensed or provincially/territorially authorized site.



**Important:** Packaged inventory must be reported in number of cannabis products for all classes and sub-classes of cannabis.

Field Name	Description
OPENING INVENTORY	
Opening inventory	The number of cannabis products packaged for sale to a consumer at the retail level held in inventory at the site on the first day of the previous month.
ADDITIONS TO INVENTORY	
Quantity packaged	The number of cannabis products resulting from unpackaged cannabis having been placed into final packaging for sale to a consumer at the retail level.
Quantity received – domestic	The number of cannabis products that were physically received from another licence holder in Canada, including all purchases and transfers.
Quantity received – returns	The number of cannabis products received as a result of a return from a consumer or another licence holder.
Other additions	The number of cannabis products received in inventory that is not captured by one of the categories above.
REDUCTIONS TO INVENTORY	
Quantity shipped – domestic	The number of cannabis products sent within

	Canada, including cannabis products shipped to other licence holders, to provincially/territorially authorized distributors and retailers, and to consumers at the retail level.
Quantity shipped – returned	The number of cannabis products sent back to a licence holder after it was purchased or received.
Quantity destroyed	The number of cannabis products that were destroyed.
Quantity lost/stolen	The number of cannabis products that were lost, stolen or otherwise unaccounted for.
Other reductions	The number of cannabis products removed from inventory that is not captured by one of the categories above.
CLOSING INVENTORY	
Closing inventory	The number of cannabis products held in inventory at the site on the last day of the previous month.
Closing inventory  Closing inventory value	



**Important:** Closing inventory should equal the sum of opening inventory plus additions minus reductions. Closing inventory should equal the next month's opening inventory.

#### 7.4 Sales

The sales section of the cannabis tracking report captures information about all medical and non-medical sales of packaged cannabis to consumers as well as intra-industry sales of packaged and unpackaged cannabis. Reporting of packaged and unpackaged inventory captures information about the physical flow of cannabis, while reporting of sales captures information about financial flow.

Non-medical sales to consumers may occur as a result of a consumer placing an order through a provincial or territorial online system or from an in-store purchase at an authorized retailer.



**Important:** All sales figures are to be reported in number of cannabis products and in Canadian dollars (net of sales tax), except in the case of intra-industry trade of unpackaged cannabis which is to be reported in kilograms and in Canadian dollars (net of sales tax).

Field Name	Description
MEDICAL	
Direct to consumer (online)	The number and the book value, in Canadian dollars (net of sales tax), of cannabis products sold to clients registered with a holder of a licence to sell cannabis for medical purposes. To be reported according to the province or territory where the consumer (i.e., registered client) resides.
	<b>NOTE:</b> Refer to <u>Appendix A5, Figure 5</u> for instructions on how to report sales of this type when an order is fulfilled using drop shipping.
NON-MEDICAL	
Direct to consumer (online)	The number and the book value, in Canadian dollars (net of sales tax), of cannabis products sold as a result of a consumer placing an order through a provincial or territorial online system. To be reported according to the province or territory where the consumer resides.
	<b>NOTE:</b> Refer to <u>Appendix A5, Figure 5</u> for instructions on how to report sales of this type when

	an order is filled using drop shipping.
Direct to consumer (retail)	The number and the book value, in Canadian dollars (net of sales tax), of cannabis products sold as a result of an in-store purchase at a provincially or territorially authorized retailer.
To distributor	The number and the book value, in Canadian dollars (net of sales tax), of cannabis products sold to a provincially or territorially authorized distributor/wholesaler.
To retailer	The number and the book value, in Canadian dollars (net of sales tax), of cannabis products sold to a provincially or territorially authorized retailer.
INTRA-INDUSTRY TRADE	
Unpackaged	The quantity, in kilograms, and the book value, in Canadian dollars (net of sales tax), of unpackaged cannabis (except for cannabis plants) sold from one licence holder to another, broken down by province or territory of the receiver.
Packaged	The number and the book value, in Canadian dollars (net of sales tax), of cannabis products sold from one licence holder to another, broken down by province or territory of the receiver.

#### 7.5 Medical

The medical section of the cannabis tracking report captures specific information about access to cannabis for medical purposes.



**Tip:** This section applies only to holders of a licence to sell cannabis for medical purposes.



**Important:** Information related to health care practitioners reports must be provided separately via .csv file upload in the CTS. Refer to  $\underline{\text{sections 5.2}}$  and  $\underline{\text{7.8}}$  for more information.

Field Name	Description	
ACTIVE REGISTRATIONS		
Number of active registrations	The total number of client registrations, by province or territory where the client resides, that were active on the last day of the previous month.	
Number of registrations transferred or returned	The number of medical documents that a licence holder transferred to another licence holder or returned to clients during the previous month, broken down by province or territory where the client resides.	
Number of shipments	The number of shipments of cannabis for medical purposes sent to registered clients during the previous month, according to the province or territory where the client resides.	
AUTHORIZED AMOUNTS		
Average amount authorized	The average authorized daily quantity of dried cannabis, in grams, associated with all client registrations that were active on the last day of the previous month.	
Median amount authorized	The median authorized daily quantity of dried cannabis, in grams, associated with all client registrations that were active on the last day of the previous month.	
Highest amount authorized	The highest authorized daily quantity of dried cannabis, in grams, associated with all client registrations that were active on the last day of the previous month.	
REGISTRATION REFUSALS		
Incomplete information	The number of registration applications that were refused during the previous month due to	

	incomplete or insufficient information.
Suspicion of false or misleading information	The number of registration applications that were refused during the previous month because the licence holder had reasonable grounds to believe that false or misleading information was, or false or falsified documents were, provided in or in support of the application.
Invalid medical document	The number of registration applications that were refused during the previous month because the medical document or registration certificate that formed the basis for the application was not valid.
Other	The number of registration applications that were refused during the previous month for any reason not listed above.
ORDER REFUSALS	
Incomplete information	The number of purchase orders that were refused during the previous month because the order was incomplete.
Expired registration	The number of purchase orders that were refused during the previous month because the client's registration was expired or had been revoked.
Order exceeds authorized amount	The number of purchase orders that were refused during the previous month because the quantities exceeded the equivalent of 150 g of dried cannabis.
Product out of stock	The number of purchase orders that were refused during the previous month due to the product being out of stock or unavailable.
Other	The number of purchase orders that were refused during the previous month for any reason not listed above.

#### 7.6 Business statistics

The business statistics section of the cannabis tracking report captures basic information related to the number of individuals employed at a location, regardless of hours worked, and includes contractors and agents. It also assesses cultivation and processing capacity across the industry.



**Tip:** The provision of employee information is voluntary. This information will help Health Canada and Statistics Canada assess the economic impacts of the *Cannabis Act*.



**Tip:** Capacity figures only apply to holders of a licence for cultivation or a licence for processing.



**Important:** With respect to capacity reporting, if the surface area consists of multiple surfaces, such as surfaces arranged above one another, the area of each surface must be included in the calculation of the total surface area.

Field Name	Description
EMPLOYEES	
Management	Senior and middle management employees
Administrative	Financial and business services employees, administrative and clerical employees, and support services employees
Sales	Retail employees, wholesale sales employees, and customer service employees
Production	Supervisory employees, and production and general labour employees
Other	All other employees

CAPACITY	
Licensed indoor growing area	The area, in square metres, within a licensed site where indoor cultivation activities occurred during the month.
Licensed processing area	The area, in square metres, within a licensed site where processing activities occurred during the month.
Total building area	The total area, in square metres, of all buildings within a licensed site.
Licensed outdoor growing area	The area, in hectares, within a licensed site where outdoor cultivation activities occurred during the month.

## 7.7 Cannabis classes and sub-classes

Fields have been introduced in the CTS to account for the new classes of cannabis and also for certain sub-classes. The following table provides details on these classes and sub-classes.

Class or sub-class	Description	Examples
Seeds	Viable seeds of a cannabis plant.	
Vegetative cannabis plants	Cannabis plants that are not budding or flowering.	Clones, seedlings
Whole cannabis plants	Cannabis plants that are budding or flowering (unpackaged only).	
Fresh cannabis	Freshly harvested cannabis buds and leaves. Does not include plant material that can be used to propagate cannabis.	Wet/raw cannabis buds and leaves
Dried cannabis	Any part of a cannabis plant that has been subjected to a drying process, other than seeds.	Dried flowers, pre- ground/milled (trim/shake), pre-rolls
Purchased hemp	The flowering heads, leaves and	

	branches of industrial hemp, as defined in subsection 1(2) of the <i>Industrial Hemp Regulations</i> , that are sold by a holder of a licence under those Regulations.	
Pure intermediates	Cannabis used in the production of another class of cannabis that is set out in items 8 to 14 of Schedule 2 of the Cannabis Tracking System Order (unpackaged only).	Extracted resin
Edibles – solids	Edible cannabis that is in solid form at a temperature of 22 ± 2°C and is intended to be eaten.	Chocolate bars, cookies, mints
Edibles – non-solids	Edible cannabis that is not in solid form at a temperature of 22 ± 2°C and is intended to be drunk.	Sodas, teas
Extracts — inhaled	Products that are produced using extraction processing methods or by synthesizing phytocannabinoids and are intended for inhalation.	Vape pens, hash, wax, rosin
Extracts – ingested	Products that are produced using extraction processing methods or by synthesizing phytocannabinoids and are intended for ingestion, including absorption in the mouth.	Tinctures, capsules, softgels, sprays intended for oral consumption
Extracts – other	Products that are produced using extraction processing methods or by synthesizing phytocannabinoids and intended for nasal, rectal or vaginal use.	Suppositories
Topicals	Products that include cannabis as an ingredient and that are intended to be used on external body surfaces (e.g., skin, hair, nails).	Creams or lotions, balms, salves

Any other class of unpackaged	
cannabis or cannabis products not	
listed above.	
	cannabis or cannabis products not

### 7.8 Health care practitioners

The health care practitioners report captures information about each health care practitioner associated with all new and renewed client registrations during the reporting period.



**Tip:** Only holders of a licence to sell cannabis for medical purposes who have registered clients during the reporting period are required to submit health care practitioners reports.



**Important:** Health care practitioner reports must be submitted via .csv file upload in the CTLS portal and are separate from the cannabis tracking reports.



**Important:** The unique ID field refers to the health care practitioner's provincial or territorial medical licence number. It should be recorded as it appears on the client's medical document and without any formatting (e.g., spaces or dashes) or additional text used by the company.

Field Name	Description
Reporting period year	The year of the reporting period. The year must appear on all rows for which there are data.
Reporting period month	The month of the reporting period. The month must appear on all rows for which there are data.
Licence number	The unique alpha-numeric identifier associated with a licence for medical sales. The licence number must appear on all rows for which there are data.
Unique ID	The provincial or territorial medical licence number of the health care practitioner as it appears on the client's medical document. The licence number should be used without any formatting (e.g., spaces or dashes) and should not include any additional text

	used by the company. This field is used to identify unique supporting health care practitioners and thus it is important that the reporting format be consistent.
First name	The first name of the health care practitioner. Do not include nicknames.
Last name	The last name of the health care practitioner.
Number of medical documents signed	The number of medical documents signed by a health care practitioner for clients who have registered during the month.
Province/territory	The province or territory where the health care practitioner was authorized to practice at the time the medical document was signed.
Postal code	The postal code for the physical location where health care practitioner practices.

# 8.0 How to make corrections to a submitted report

Once a report has been submitted, it cannot be re-opened for further editing.

To make a correction to a submitted report, email <a href="https://example.com/hc.ctls-bi-sscdl-ie.sc@canada.ca">hc.ctls-bi-sscdl-ie.sc@canada.ca</a> and include CTLS Reporting in the subject line. Include the report ID and licence number in the body of the message, as well as your contact information and the date the report was submitted. Provide as many details as possible.

A Health Canada officer will contact you by phone or by email to discuss the correction. For minor corrections, the officer can make the corrections directly in the system on your behalf. For more substantive corrections and if your report was submitted manually, the officer can make it available in the Draft Cannabis Tracking Reports section of the CTLS so you can make the necessary corrections and resubmit the report. However, if major corrections are required to a report that was submitted via file upload, the officer must invalidate the original report and you will then be required to submit a new report for that particular licence and reporting period.

It is up to the officer to determine whether the correction will be made directly or whether the report will be made available for resubmission. All corrections have an audit trail for future verification and investigation if necessary.

# 9.0 Compliance and enforcement

It is critical that reports be accurate and submitted on time each month. When reporters do not comply with reporting obligations or are habitually late submitting reports, or when Health Canada has concerns about the validity or accuracy of submitted data, a referral may be made to Health Canada's Compliance and Enforcement Directorate and this could result in enforcement action.



**Important:** The licence holder's responsible person is accountable for the timely submission of reports and the accuracy and completeness of the data.

# **10.0** Reporting scenarios

Refer to Appendix A for detailed instructions on how to account for certain activities with cannabis, such as drop shipping or product transformations from one class of cannabis to another.

## 11.0 For more assistance

If you have questions about submitting monthly reports through the CTLS, email <a href="https://example.com/hc.ctls-bi-sscdl-ie.sc@canada.ca">hc.ctls-bi-sscdl-ie.sc@canada.ca</a> with CTLS Reporting in the subject line.

If your request pertains to an error message received during the submission process, provide as many details as possible including screen shots and, if the error was related to a file upload, a copy of the .csv file that could not be uploaded.

# 12.0 Feedback — Help us improve

Health Canada is committed to providing all stakeholders with timely, accurate and reliable information, including the information they need to comply with the *Cannabis Act*, its Regulations and the Cannabis Tracking System Order.

We would appreciate receiving your feedback on whether this guide was useful, and we welcome your suggestions for improvement. Email your feedback to us at <a href="https://example.com/hc.ctls-bi-sscdl-ie.sc@canada.ca">hc.ctls-bi-sscdl-ie.sc@canada.ca</a> and indicate in the subject line **Feedback on the Monthly Reporting Guide**.

# **Appendix A Reporting scenarios**

The following scenarios outline how to account for certain activities with cannabis in the CTS. They include illustrations from the cannabis tracking reports tool to show how the data elements are connected.

## **A1** Closing inventories

Under the new Cannabis Tracking System Order (published on June 26, 2019), reporters are required to report the closing inventory of unpackaged and packaged cannabis by class.

For unpackaged cannabis, this is the total weight in kilograms (except for plants, which are recorded by number of plants) of the inventory at the end of the reporting period and its book value in Canadian dollars, net of sales tax.

For packaged cannabis, this is the total number of packaged units of cannabis products held in inventory at the end of the month, as well as the estimated weight of the cannabis contained in those products in kilograms (except for seeds and plants which are recorded by number of seeds and number of plants respectively), and their book value in Canadian dollars, net of sales tax.

From an inventory accounting perspective, the closing inventory should be equal to the opening inventory at the beginning of the month plus all additions during the month minus all reductions during the month.

For example, Company A ...

- Begins the month with 10 kilograms of unpackaged cannabis seeds ("Unpackaged" tab, cell C6) in the opening inventory.
- During the month, it has the following additions:
  - o 1 kg was produced on-site ("Unpackaged" tab, cell C9)
  - 1 kg of seeds was purchased from another licence holder ("Unpackaged" tab, cell
     C10)
- Also during the month, it has the following reductions:
  - o 1 kg was planted ("Unpackaged" tab, cell C17)
  - o 2 kg were packaged ("Unpackaged" tab, cell C24) for eventual retail sale
  - o 1 kg was destroyed ("Unpackaged" tab, cell C32)

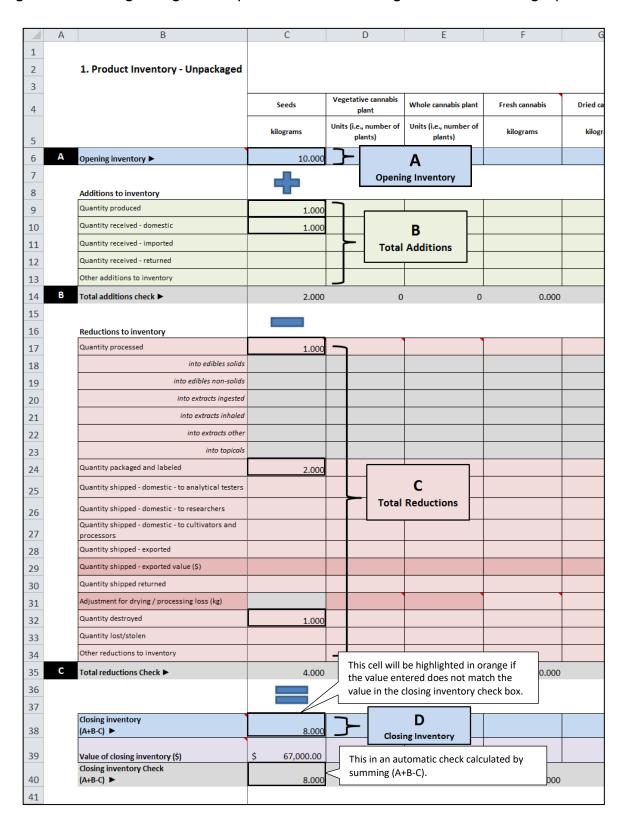
By this account, at the end of the month, Company A should have 8 kg of unpackaged seeds remaining in inventory > 10+1+1-1-2-1 ("Unpackaged" tab, cell C38).

Figure 1 illustrates this accounting using the cannabis tracking reports tool.



**Important:** In the case of unpackaged cannabis plants, live trimmings are to be reported under drying/processing loss and measured in kilograms. This quantity should not be included in the calculation of inventories, which are measured in number of plants.

Figure 1: Calculating closing inventory for cannabis seeds using the cannabis tracking reports tool



## A2 Product transformations from one product class to another

Unpackaged inventories are designed to capture not only the quantities of cannabis entering and exiting a site, but also the transformation of cannabis from one class to another.

For example, in fresh cannabis, Company A ...

- Began the month with 1,000 kg of fresh cannabis ("Unpackaged" tab, cell F6)
- During the month, it had the following reductions:
  - o 100 kg completed the drying process and was moved to unpackaged dried cannabis inventory ("Unpackaged" tab, cell F17)
  - o An estimated 500 kg of moisture weight lost during the drying process ("Unpackaged" tab, cell F31)
  - o 200 kg of unusable product destroyed ("Unpackaged" tab, cell F32)

In dried cannabis, Company A ...

- Had the following additions during the month:
  - o The 100 kg that completed the drying process was added to unpackaged dried cannabis ("Unpackaged" tab, cell G9)

By this account, at the end of the month, Company A should have 200 kg of unpackaged fresh cannabis remaining in inventory > 1,000-100-500-200 ("Unpackaged" tab, cell F38). In addition, Company A should record 100 kg of dried cannabis production as an addition to its dried cannabis inventory ("Unpackaged" tab, cell G9).

Figure 2 illustrates this accounting using the cannabis tracking reports tool.



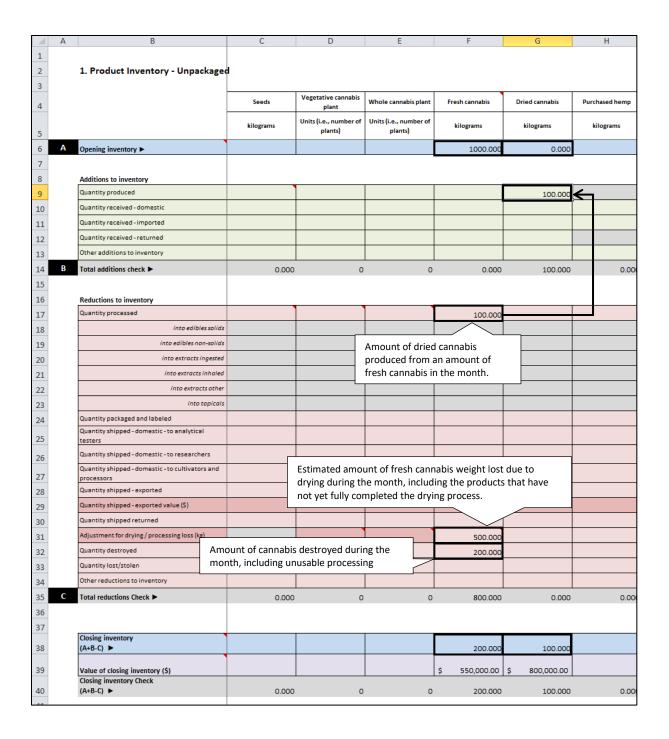
**Important:** In the following cases, the quantity of the cannabis processed of one class should equal the quantity of the other class produced:

- vegetative cannabis plants processed into whole cannabis plants
- fresh cannabis processed into dried cannabis
- dried cannabis processed into pure intermediates

In the following cases, the quantity of the cannabis processed of one class will not equal the quantity of the other class produced:

- cannabis seeds processed into vegetative cannabis plants (kilograms versus individual units)
- whole cannabis plants processed into fresh cannabis (individual units versus kilograms)
- pure intermediates processed into a derivative cannabis product (derivative cannabis products include the weight of the non-cannabis additives)

Figure 2: Reporting fresh cannabis transformed into dried cannabis



## A3 Moving from unpackaged to packaged inventory

When unpackaged cannabis is packaged and labelled for sale, it should be recorded both as a reduction to unpackaged inventory and an addition to packaged inventory.

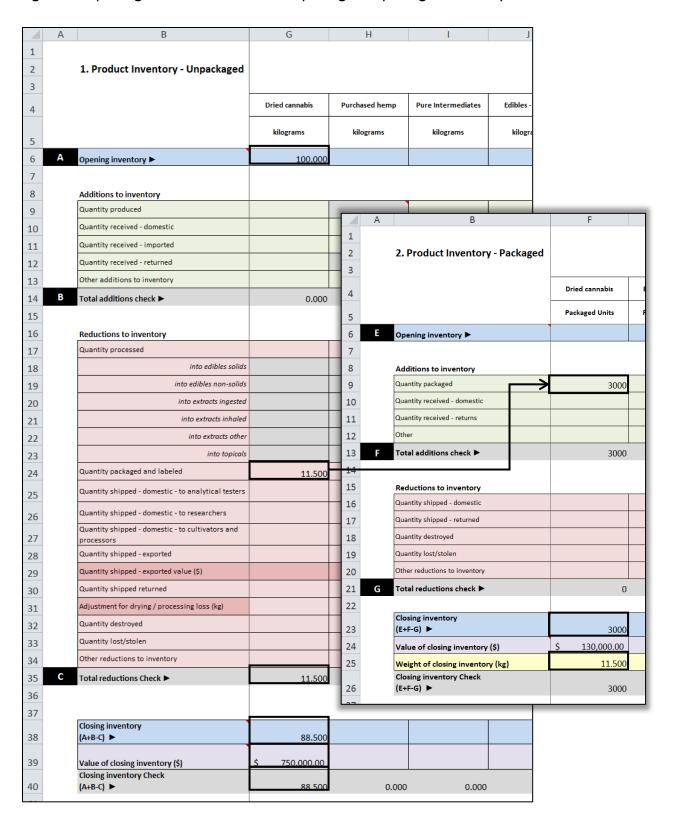
For example, Company A packages 11.5 kg of dried cannabis into:

- 1,000 of 1 gram pre-rolls (1,000 grams = 1 kg of dried cannabis);
- 1,000 of 3.5 gram containers (3,500 grams = 3.5 kg of dried cannabis);
- 1,000 of 7 gram containers (7,000 grams = 7 kg of dried cannabis)

This would be recorded as a 11.5 kg reduction to unpackaged dried cannabis inventory (quantity packaged; "Unpackaged" tab, cell G24) and a 3,000 unit addition to packaged dried cannabis inventory (quantity packaged; "Packaged" tab, cell F9).

Figure 3 illustrates this accounting using the cannabis tracking reports tool.

Figure 3: Reporting cannabis moved from unpackaged to packaged inventory



## **A4** Reporting sales

Where packaged and unpackaged inventories reporting is designed to capture the physical flows of cannabis, sales are intended to capture financial flows.

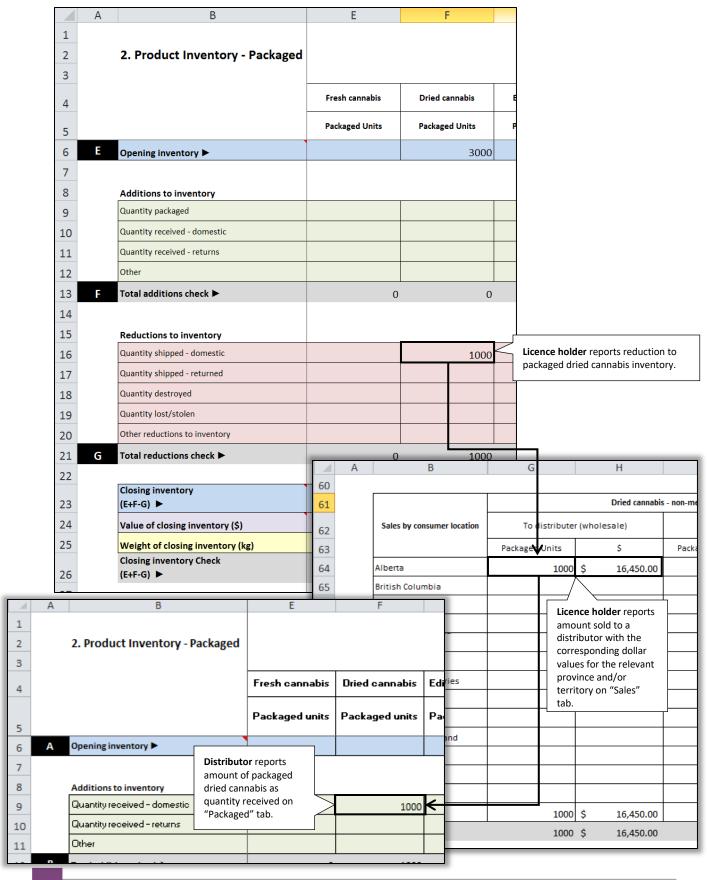
For example, Company A sells and ships 1,000 units of dried cannabis products to a provincial or territorial distributor.

- Packaged inventory reporting: Company A includes this in its reductions to dried cannabis inventories (*quantity shipped domestic;* "Packaged" tab, cell F16).
- Sales inventory reporting: Company A records this as 1,000 units sold to the distributor in the respective province or territory, along with the corresponding Canadian dollar value, net of sales tax (*to distributor*; "Sales" tab, cells G64 and H64).

The distributor records this as a 1,000-unit addition to packaged dried cannabis inventory (quantity received – domestic; "Packaged" tab, Cell F9).

Figure 4 illustrates this accounting using the cannabis tracking reports tool.

Figure 4: Reporting packaged dried cannabis sales to a provincial or territorial distributor



## **A5** Reporting sales: Drop shipping

Where a customer orders product through a provincial or territorial distributor's online platform and the distributor then directs its supplier to ship the product directly to the customer (commonly referred to as drop shipping), it should be recorded as follows:

- The supplier (processor): Record the quantity and wholesale value as a sale to a distributor and show the corresponding quantity reduction to their packaged inventory.
- The provincial or territorial distributor: Record the quantity and retail value as a non-medical sale to consumer online. Do not record any changes to its packaged inventory.

<u>Figure 5</u> illustrates this accounting using the cannabis tracking reports tool.

Figure 5: Reporting online packaged dried cannabis sales direct to customer (drop shipping)

