



PHYSICAL SECURITY MEASURES GUIDE FOR CANNABIS

Requirements under Part 4 of the *Cannabis
Regulations*



Government
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The purpose of the *Cannabis Act* and its Regulations is to protect public health and public safety. This guide is meant to provide assistance to industry on how to comply with the required physical security measures under the *Cannabis Regulations*.

Guidance documents are administrative instruments not having force of law and, as such, allow for flexibility in approach. Alternate approaches to the principles and practices described in this document may be acceptable if they meet the requirements of the *Cannabis Regulations*.

As a corollary to the above, Health Canada reserves the right to request information or material, or define conditions not specifically described in the document, to allow the Department to adequately mitigate the risk of diversion of cannabis to an illicit market or use.

Disclaimer:

This document should be read in conjunction with relevant sections of the *Cannabis Act*, its Regulations, Ministerial orders, and other instruments. In the case of any discrepancies between this document and the *Cannabis Act* and its Regulations, the latter shall prevail. The reader is advised to consult other legislation that may apply to them or their activities, such as applicable provincial or territorial legislation.

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1.0 Purpose

The purpose of this document is to provide guidance to holders of a licence under the *Cannabis Act* (hereafter referred to as licence holders) on the application of Part 4: Physical Security Measures of the *Cannabis Regulations*. It is designed to help licence holders understand the physical security requirements for conducting authorized activities with cannabis.

2.0 Background

The *Cannabis Act* (hereafter referred to as “the Act”) and its Regulations provide, among other things, the framework for legal access to cannabis and the control and regulation of its production, distribution and sale.

Part 4 of the *Cannabis Regulations* sets out physical security measures that are required and are necessary to secure sites where licence holders conduct activities with cannabis.

Guidance documents are administrative instruments not having force of law and, as such, allow for flexibility in approach. This guide is one of a series of guidance documents written as an accompaniment to the *Cannabis Regulations* under the Act. Health Canada publishes other guidance documents and information on its website that licence holders may use in conjunction with this document to maintain their compliance. For consistency and transparency, this guide and other guidance documents and information are updated as required to reflect changes to policies and/or operations.

3.0 Scope

This guide pertains to licence holders’ sites and the compliance of those sites with the physical security measures provisions set out in Part 4 of the *Cannabis Regulations*.

The scope of this guide includes the following classes and subclasses of licences:

- Cultivation (including licences for micro- and standard cultivation or nursery)
- Processing (including licences for micro- or standard processing)
- Sale for medical purposes
- Analytical testing
- Research

Note that the physical security requirements vary by licence class. As such, please be sure to read the sections of this guide relevant to the licence class(es) of interest.

The following class of licence is not addressed in this guide:

- Cannabis drug licence

For more information on requirements for a cannabis drug licence, licence holders may refer to the *Cannabis Act* and its Regulations, additional guidance published on the [Health Canada website](#), or contact Health Canada as outlined in section 6 of this guide.

Additionally, the appendices in this guide provide information on additional requirements outlined in other parts of the *Cannabis Regulations* as they pertain to physical security measures, namely Part 2: Licensing and Part 11: Retention of Documents and Information.

Licence holders should refer to the [Cannabis Licence Management Guide](#) for more information with regards to changes to the physical security measures of their site.

4.0 Definitions and abbreviations

4.1 Definitions

The *Cannabis Act* and its Regulations should be referred to for definitions. The definitions in this section are provided for greater clarity and ease of reference.

Cannabis: As defined in subsection 2(1) of the Act, means a cannabis plant and anything referred to in Schedule 1 of the Act, but does not include anything referred to in Schedule 2 of the Act.

Classes of licences: For the purpose of this guide, means any one of the classes outlined in section 8 of the *Cannabis Regulations*.

Grow area: As defined in subsection 1(1) of the *Cannabis Regulations*, means, in respect of a site set out in a licence, an area of the site where cannabis plants are cultivated, harvested or propagated.

Licence holder: For the purpose of this document, means the holder of a licence, as listed in section 8 of the *Cannabis Regulations*.

Operations area: As defined in subsection 1(1) of *Cannabis Regulations*, means, in respect of a site set out in a licence, an area of the site — other than a storage area — where cannabis is present as a result of any activities conducted under a licence. It includes a grow area.

Site: As defined in 1(1) of the *Cannabis Regulations*, means, in respect of a holder of a licence, an area that is used exclusively by the holder and that consists of at least one building or one part of a building.

Storage area: As defined in subsection 1(1) of the *Cannabis Regulations*, means, in respect of a site set out in a licence, an area of the site where cannabis is stored.

4.2 Abbreviations

Part 2 Licensing requirements of the *Cannabis Regulations*

Part 4 Physical security measures of the *Cannabis Regulations*

Part 11 Retention of documents and information requirements of the *Cannabis Regulations*

The Act the *Cannabis Act*

4.3 Icons

The following icons are used throughout this guide to highlight information of interest.



Important: Key or cautionary information.



Tip: Supplementary information that could be helpful, including references to external documents.

5.0 Physical security measures: regulatory requirements

Part 4 of the *Cannabis Regulations* establishes requirements pertaining to physical security measures, in order to ensure that a licence holder's site is adequately secured and safeguarded at all times to protect public safety and to minimize the risks of diversion.

This part of the guide is organized into the following sections:

- Section [5.1](#): The requirements that must be met for a holder of a licence for standard cultivation, standard processing and sale for medical purposes (with possession of cannabis). This section is further organized into the following sections:
 - Section [5.1.1](#): Site design
 - Section [5.1.2](#): Perimeter of site
 - Section [5.1.3](#): Operations areas and storage areas
 - Section [5.1.4](#): Retention of information
- Section [5.2](#): The requirements that must be met for a holder of other licences. This section is further organized into the following sections:
 - Section [5.2.1](#): Micro-cultivation, micro-processing and nursery
 - Section [5.2.2](#): Analytical testing
 - Section [5.2.3](#): Research
 - Section [5.2.4](#): Sale for medical purposes without possession

Each licence holder is responsible for understanding and complying with required physical security measures that apply to their licence. They must be able to demonstrate that their site is secured in accordance with the *Cannabis Regulations*.

As noted above, [Appendix A](#) and [Appendix B](#) provide a summary of requirements related to physical security measures in Part 2: Licensing and Part 11: Retention of Documents and Information of the *Cannabis Regulations*, respectively.



This guide provides examples of principles and practices that may be used to achieve compliance with sections of Part 4; however, these are not intended as exhaustive lists.

Alternate approaches to the principles and practices described in this guide may be acceptable if they meet the requirements of the *Cannabis Regulations*.

5.1 Standard cultivation, standard processing and sale for medical purposes (with possession of cannabis)

As per section 62 of the *Cannabis Regulations*, holders of a licence for standard cultivation, standard processing or sale for medical purposes (with possession of cannabis) must comply with the requirements set out in section 63 to section 72. The record keeping requirements under section 73 also apply.

This section of the guide addresses section 63 to section 73 of the *Cannabis Regulations* and is organized as follows:

- Site design (section 63)
- Perimeter of site (section 64 to section 66)
- Operations areas and storage areas (section 67 to section 72)
- Retention (section 73)

5.1.1 Site Design

As per section 63 of the *Cannabis Regulations*, the site must be designed in a manner that prevents unauthorized access.

The site includes all areas within the defined perimeter. It is up to the licence holder to indicate their proposed perimeter. The licence holder should consider the rings of protection concept when designing the site.

The rings of protection concept requires the construction of various rings or barriers of protection around the items being protected. The rings of protection concept is usually designed so that the intruder is detected when they surmount the first barrier and the rest of the barriers are present to slow them down to such an extent that the police have arrived before they have departed with the goods.

All the security measures required should be implemented in such a way that the components work collectively to adequately secure the site and prevent unauthorized access.

5.1.2 *Perimeter*

The physical security measures required for the perimeter of the site are set out in section 64 to section 66 of the *Cannabis Regulations*.

It is up to the licence holder to indicate the proposed perimeter of the site, whether it be the fence line, the exterior building walls, or by any other means. However defined, the perimeter must be clearly indicated on the site plans.

Licence holders should choose their perimeter carefully considering the requirements of section 64 to section 66 of the *Cannabis Regulations*.



To change the perimeter of the site after the issuance of a licence, the licence holder must submit an amendment application for a change requiring approval. Refer to the [Cannabis Licence Management Guide](#) for more information.

5.1.2.1 *Visual monitoring*

As per subsection 64(1) of the *Cannabis Regulations*, the perimeter of the site must be monitored at all times by visual recording devices to detect any attempted or actual unauthorized access to the site.

Examples of principles or practices that may demonstrate compliance with subsection 64(1) are as follows:

- The visual monitoring system is connected to a back-up generator to allow the system to operate during a power outage.
- Perimeter cameras are located and positioned in a manner that allows the **entire** perimeter to be monitored, and there are no blind spots caused by lapses in camera coverage.
 - In the case where the perimeter wall is shared with a neighbouring business and cameras cannot be used to monitor the exterior surface of the perimeter wall, the cameras must monitor the interior surface of the perimeter wall. In this case, the perimeter wall must be monitored from the interior regardless of the physical security measures required or not required for the area (e.g., grow area, operations area, storage area or non-cannabis area).
- The area near the perimeter is clear of any objects that may obstruct camera views of the perimeter.

- The **entire** perimeter is monitored and can clearly capture the presence of an individual **at the perimeter** during the day and at night.

5.1.2.2 Visual recording devices

As per subsection 64(2) of the *Cannabis Regulations*, the visual monitoring devices must, in conditions under which they are used, be capable of making a visible recording of any attempted or actual unauthorized access.

Examples of principles or practices that may demonstrate compliance with subsection 64(2) are as follows:

- Outdoor cameras have an operating temperature range that is appropriate for the site's location and are able to operate in cold winter temperatures and hot summer temperatures.
- Outdoor cameras are weatherproof and are suitable for outdoor use. Camera footage is not compromised due to ice build-up, water streaking, fogging or other environmental conditions.
- Cameras are able to make a visible recording of the presence of an individual **at the perimeter** in low light and dark conditions.
 - Cameras have a built-in night vision feature such as near-infrared (NIR) and infrared (IR) illumination. Alternatively, facility lighting such as flood lights are used to address low light conditions. In this case, facility lights are also connected to a back-up power generator, and there are measures in place to ensure that the lights are reliably activated during low light and nighttime conditions.

5.1.2.3 Intrusion detection system

As per section 65 of the *Cannabis Regulations*, the perimeter of the site must be secured by means of an intrusion detection system that operates at all times and that allows for the detection of any attempted or actual unauthorized access to the site and any attempted or actual tampering with the system.

Some examples of intrusion detection devices are door or gate contacts, fence intrusion detection sensors, photoelectric beam sensors, passive infrared motion detections, curtain motion detectors, video analytics, seismic sensors, and glass break sensors.

Examples of principles or practices that may demonstrate compliance with section 65 are as follows:

- The intrusion detection system is connected to a back-up generator to allow the system to operate during a power outage.
- The perimeter intrusion detection devices are located and positioned in a manner that secures the **entire** perimeter.

- Detection ranges and detection coverage for devices are sufficient for the intended application. Some cases to consider are as follows:
 - A short range motion detector may not have sufficient range to secure a long fence or wall. In this case, one may consider installing multiple motion detectors along the fence or wall, or one may consider using a motion detector with a longer range to secure the proposed area.
 - Curtain motion detectors have a different detection pattern compared to more traditional motion detectors. Curtain motion detectors may be better suited for monitoring surfaces like walls, doorways and other well-defined areas. Traditional motion detectors may be better suited for monitoring expansive areas such a field.
- Outdoor intrusion detection devices have an operating temperature range that is appropriate for the site's location. The devices have to be able to operate in cold winter temperatures and hot summer temperatures.
- Outdoor intrusion detection devices are designed and suitable for outdoor use.
- Devices are installed and mounted as per the manufacturer's instructions or recommendations.
 - Motion detectors designed to be mounted on the wall may not be suitable for mounting on other surfaces considering the mounting angles and mounting heights.
 - Seismic detectors may not be suitable for mounting on certain wall materials depending on the material's ability to transmit vibrations.
- The intrusion detection system is able to detect any attempted or actual tampering with the system.
 - Tampering includes any way of disabling the system such as cutting power or disrupting signal or communication lines. A distress alert, notification and/or alarm signal is sent to the system monitor if tampering is detected.
- All intrusion detection devices for the site are organized into appropriate alarm partitions to allow for the arming and disarming of separate alarm zones as needed. The alarm partition for the perimeter intrusion detection devices is armed **at all times**.



The perimeter intrusion detection system should be designed in a manner that minimizes false alarms considering that the perimeter intrusion detection system needs to operate **at all times**.



Each intrusion detection device should generate an alarm report that at a minimum contains the following:

- The identifier unique to the device
- The date the alarm was triggered
- The time the alarm was triggered



If the perimeter intrusion detection system is solely made up of motion detectors, the system should be designed in a manner that minimizes false alarms considering that the perimeter intrusion detection system needs to operate **at all times**, including during site operating hours.

5.1.2.4 Monitoring and response

As per subsection 66(1) of the *Cannabis Regulations*, the intrusion detection system referred to in section 65 must be monitored continuously **at all times** (i.e. 365 days a year, 7 days a week and 24 hours a day).

Examples of principles or practices that may demonstrate compliance with subsection 66(1) are as follows:

- A third-party security alarm monitoring company is used to monitor the intrusion detection system at all times.
- The site has an on-site security monitoring station to monitor the intrusion detection system at all times. Additionally, on-site security monitoring is also accomplished through push notifications to key personnel.
- A combination of on-site monitoring and a third-party alarm monitoring service is implemented to ensure that the intrusion detection system is monitored at all times.

5.1.2.5 Appropriate measures

As per subsection 66(2) of the *Cannabis Regulations*, the holder of a licence must determine the appropriate measures to be taken if any occurrence referred to in section 65 is detected.

Licence holders should have a procedure in place when an alarm for the perimeter intrusion detection system is triggered.

Licence holders may consider including the following steps when developing their procedure:

- Notifying the appropriate personnel (e.g., Head of Security) of the detected occurrence
- Investigating the alarm

- Escalating the case to the local authorities, if applicable
- Making a record of the event
- Addressing any security vulnerabilities, if applicable (i.e. corrective actions and preventative actions)

5.1.2.6 Record of detected occurrences

As per subsection 66(3) of the *Cannabis Regulations*, if any such occurrence referred to in section 65 is detected, the holder of the licence must ensure that a document is retained that contains the date and time of the occurrence and the measures taken in response to the occurrence along with the date and time the measures were taken.

A licence holder should have a procedure for creating and maintaining these records of detected occurrences.

Licence holders may wish to consider the following elements when developing their procedure:

- The information required to be recorded
- The manner in which the record will be created and maintained (electronic or paper)
- The individuals who will have access to the records
- The location where the records will be stored

5.1.3 Operations areas and storage areas

The security measures required for the operations areas and storage areas of a site are set out in section 67 to section 72 of the *Cannabis Regulations*. This section of the guide outlines these requirements in further detail.



Regulations regarding [grow areas](#) such as subsection 70(2) and subsection 71(2) of the *Cannabis Regulations* only apply to licences for micro-cultivation, standard cultivation and nursery.

5.1.3.1 Location of storage area

As per section 67 of the *Cannabis Regulations*, each [storage area](#) must be located within an area that satisfies the security measures set out in:

- Subsection 68(1) — Restricted access
 - Refer to section [5.1.3.2](#) of this guide for information regarding access restriction.
- Section 69 — Physical barrier
 - Refer to section [5.1.3.4](#) of this guide for information regarding physical barriers.
- Subsection 70(1) — Visual monitoring
 - Refer to section [5.1.3.5](#) of this guide for information regarding visual monitoring.
- Subsection 70(3) — Visual recording devices

- Refer to section [5.1.3.7](#) of this guide for information regarding visual recording devices.
- Subsection 71(1) — Intrusion detection system
 - Refer to section [5.1.3.8](#) of this guide for information regarding the intrusion detection system.
- Section 72 — Monitoring and response
 - Refer to section [5.1.3.10](#), section [5.1.3.11](#), and section [5.1.3.12](#) of this guide for information regarding monitoring and response.

The licence holder should consider the [rings of protection concept](#) when designing the site and choosing the location of the storage area(s).

5.1.3.2 Restricted Access

As per subsection 68(1) of the *Cannabis Regulations*, access to each [operations area](#) and storage area must be restricted to individuals whose presence in the area is required by their duties.

Examples of principles or practices that may demonstrate compliance with subsection 68(1) are as follows:

- All access points such as doors, gates and ceiling hatches that lead into operations areas or storage areas have access control or restriction devices. Some examples of access control or restriction devices include:
 - Proximity card readers or keypads with electric door strikes or electromagnetic locks
 - Door lock and key
- Access control devices are on the door **immediately** leading into the operations area or storage area. This includes cases where vestibules, air locks and mantraps are located right before an operations area's or storage area's access point.
- Access credentials or permissions are only granted to specific individuals for specific areas as required by their job duties.
 - Licence holders have a procedure in place for granting temporary access and restricting access for visitors (i.e. guests, vendors and contractors).



Access control or restriction devices may not be necessary for operations rooms that lead into other operations rooms that have the **same level of access restriction** and may also not be necessary considering certain building configurations like operations rooms leading to dead-end rooms or walk-in closets.

5.1.3.3 Record — storage area

As per subsection 68(2) of the *Cannabis Regulations*, a record must be maintained of the identity of every individual entering or exiting a storage area.

Examples of principles or practices that may demonstrate compliance with subsection 68(2) are as follows:

- Access logging devices such as proximity card readers, electronic sign-ins or other logging means are present on both sides of every door to the storage area.
 - Licence holders have a procedure in place for logging the entry to and exit from the storage area for visitors (i.e. guests, vendors and contractors).
- Access logs for the storage area contain the following:
 - The date and time of entry and exit
 - The identity of the individual
 - The name of the area being accessed
 - The identifier for the access point (e.g., door, gate, etc.) used, especially if there is more than one access point
 - A corresponding exit log for each entry log

5.1.3.4 Physical barriers

As per section 69 of the *Cannabis Regulations*, each operations area and storage area must be surrounded by a physical barrier that prevents unauthorized access for standard cultivation, standard processing and sale for medical purposes with possession licence classes.

Physical barriers should be constructed in a manner that presents a sufficient obstacle to deter any attempted forced entry. The construction of the barrier should delay the entry of the intruder into the area. The barrier should hinder someone from gaining access to the area.

The physical barrier should be continuous, and it should **entirely** surround **each** operations area and storage area.

Examples of principles or practices that may demonstrate compliance with section 69 are as follows:

- Walls
 - Walls are strong and sturdy enough to be considered an inefficient point of entry.
- Doors
 - Doors, door locks and door frames are solid and strong enough to prevent easy breaching.
 - Ceiling or service hatches are secured with a lock.

- Hinge pins are located on the inside of the secured area. If door hinges are exposed to the exterior, security hinges are used to prevent the removal of the door.
- Windows
 - Windows are strong and sturdy enough so that breaching presents a challenge.
 - Overall window construction such as window thickness, number of panes and window material (e.g., wire glass, laminated glass, polycarbonate, composite, etc.) results in a sturdy barrier.
 - Bars, steel grills and other window coverings may also be used to secure windows.
 - Windows locks are located on the inside of the secured area.
- Fences
 - Fences are continuous without breaks and well maintained.
 - The bottom of the fence is close enough to the ground to prevent entry underneath the fence. If the fence passes over a trench or culvert, the opening is secured with fencing, metal grills or other barriers.
 - The fence is constructed in a manner that prevents someone from easily jumping or climbing over it.
- Vent openings
 - Vent openings are constructed to prevent an individual from crawling through.
 - Large accessible vent openings are secured with protective coverings such as metal grills, bars or expanded metal mesh to prevent entry by crawling through.



Outdoor grow areas are operations areas and must be surrounded by a physical barrier. A common physical barrier for outdoor grow areas is a chain-linked fence. If used, the fence should be taut and firmly secured to rigid metal posts.

In some cases, the perimeter fence for the site may be used as the physical barrier for or may be a part of the physical barrier for an outdoor grow area.

5.1.3.5 Visual monitoring

As per subsection 70(1) of the *Cannabis Regulations*, each operations area and storage area must be monitored at all times by visual recording devices to detect illicit conduct.

Examples of principles or practices that may demonstrate compliance with subsection 70(1) are as follows:

- The visual monitoring system is connected to a back-up generator to allow the system to operate during a power outage.

- **Each** operations area and storage area has cameras that are located and positioned in a manner that allows for the **entire** area to be monitored. There are no blind spots caused by lapses in camera coverage.
- Permanent or temporary equipment do not obscure the overall visual monitoring of the area.
- The **entire** operations area or storage area is monitored and can clearly capture the activities of an individual within the space when the lights are on and when the lights are off (i.e. when the room is in low light or darkness).



Grow areas are considered operations areas. However, there are some exceptions that apply specifically to grow areas. Please see the next section for additional information relating to the visual monitoring requirements for grow areas.

5.1.3.5.1 Visual monitoring: exception — grow area



The information in section 5.1.3.5.1 applies only to standard cultivation licence holders.

Subsection 70(2) of the *Cannabis Regulations* narrows the scope of the requirements in subsection 70(1) by stipulating that, for a grow area, only the entry and exit points of the area must be monitored by the visual monitoring devices.

Examples of principles or practices that may demonstrate compliance with subsection 70(1), as modified by subsection 70(2) are as follows:

- Each access point (i.e. door or gate) for every grow area is monitored by at least one camera. The camera is placed outside or inside the grow area in a manner that ensure that the access point is clearly monitored.
- The cameras monitoring the entry and exit points for grow areas are able to capture the presence of an individual entering or exiting the grow area when the lights are on (during the day for outdoor grow areas) or in low light conditions when the lights are off (at night for outdoor grow areas).



A single camera in a corridor may be used to monitor the access point to more than one grow area. However, the camera footage should be clear enough to detect the presence of an individual entering and exiting **each** grow area when the lights are on and in low light conditions when the lights are off (i.e. when the corridor is dark).

5.1.3.7 Visual recording devices

As per subsection 70(3) of the *Cannabis Regulations*, the visual recording devices must, in conditions under which they are used, be capable of making a visible recording of any illicit conduct.

Examples of principles or practices that may demonstrate compliance with subsection 70(3) are as follows:

- Cameras have an operating temperature range that is appropriate for the operations area, storage area or general area they are located in.
 - For outdoor grow areas, cameras have an operating temperature range that is appropriate for the site's location and can operate in cold winter temperatures and hot summer temperatures.
- For outdoor grow areas, cameras are weatherproof and are suitable for outdoor use. Camera footage is not compromised due to ice build-up, water streaking, fogging or other environmental conditions.
- For all operations areas excluding grow areas, cameras are able to make a visible recording of the activities of an individual within the space in low light and dark conditions.
 - For grow areas, cameras are able to make a visible recording of the presence of an individual entering and exiting the grow area in low light and dark conditions.
 - Cameras have a built-in night vision feature such as near-infrared (NIR) and infrared (IR) illumination. Alternatively, facility lighting such as room lights are used to address low light conditions. In this case, room lights are also connected to a back-up power generator, and the room lights are always on.

5.1.3.8 Intrusion detection system

As per subsection 71(1) of the *Cannabis Regulations*, each operations area and storage area must be secured by means of an intrusion detection system that operates at all times and that allows for the detection of any attempted or actual unauthorized access to the area, any unauthorized movement in the area and any attempted or actual tampering with the system.

Some examples of intrusion detection devices are door or gate contacts, fence intrusion detection sensors, photoelectric beam sensors, passive infrared motion detections, curtain motion detectors, video analytics, seismic sensors, and glass break sensors.

Examples of principles or practices that may demonstrate compliance with subsection 71(1) are as follows:

- The intrusion detection system is connected to a back-up generator to allow for the system to operate during a power outage.

- The intrusion detection devices for all operations areas and storage areas are located and positioned in a manner that secures the **entire** operations area or storage area.
- Detection ranges and detection coverage for devices are appropriate for the intended application. Some cases to consider are as follows:
 - A short range motion detector may not have sufficient range to secure a long fence or wall. For this case, one may consider installing multiple motion detectors along the fence or wall, or one may consider using a motion detector with a longer range to secure the proposed area.
 - Curtain motion detectors have a different detection pattern compared to more traditional motion detectors. Curtain motion detectors may be better suited for monitoring surfaces like walls, doorways and other well-defined areas. Traditional motion detectors may be better suited for monitoring expansive areas such as a portion of a room.
- Intrusion detection devices have an operating temperature range that is appropriate for the operations area, storage area or general area they are located.
 - For outdoor grow areas, intrusion detection devices have an operating temperature range that is appropriate for the site's location and are able to operate in cold winter temperatures and hot summer temperatures.
 - For outdoor grow areas, intrusion detection devices are designed and suitable for outdoor use.
- Devices are installed and mounted as per the manufacturer's instructions or recommendations.
 - Motion detectors designed to be mounted on the wall may not be suitable for mounting on other surfaces considering the mounting angles and mounting heights.
 - Seismic detectors may not be suitable for mounting on certain wall materials depending on the material's ability to transmit vibrations.
- The intrusion detection system is able to detect any attempted or actual tampering with the system.
 - Tampering includes any way of disabling the system such as cutting power or disrupting signal or communication lines. A distress alert, notification and/or alarm signal is sent to the system monitor if tampering is detected.
- All intrusion detection devices for the site are organized into appropriate alarm partitions to allow for the arming and disarming of separate alarm zones as needed. The alarm partitions for areas not being used are armed **at all times**.



The intrusion detection system should be designed in a manner that minimizes false alarms considering that the intrusion detection system needs to operate **at all times**.



Each intrusion detection device should generate an alarm report that at a minimum contains the following:

- The identifier specific to the device
- The date the alarm was triggered
- The time the alarm was triggered



Grow areas are considered operations areas. However, there are some exceptions that apply specifically to grow areas. Please see the next section for additional information relating to the intrusion detection requirements for grow areas.

5.1.3.8.1 Intrusion detection system: exception — grow area



The information in section 5.1.3.8.1 applies only to standard cultivation licence holders.

As per subsection 71(2) of the *Cannabis Regulations*, the intrusion detection system is not required to detect unauthorized **movement in** a grow area.

Grow areas are still required to be secured by means of an intrusion detection system that operates at all times and that allows for the detection of any attempted or actual unauthorized access **to the area** and any attempted or actual tampering with the system.

Examples of principles or practices that may demonstrate compliance with subsection 71(2) are as follows:

- Each access point (i.e. door or gate) to every grow area is secured by an intrusion detection device (e.g., door or gate contact).
- For outdoor grow areas, the **entire** perimeter of the grow area is secured with intrusion detection.



If the perimeter of a grow area is defined as the surrounding chain link fence, the fence may be equipped with fence mounted sensor or fence specific intrusion detection sensor.

A microphonic cable sensor designed for a chain link fence is one example of an intrusion detection device that may demonstrate compliance.

5.1.3.10 Monitoring and response

As per subsection 72(1) of the *Cannabis Regulations*, the intrusion detection system referred to in section 71 must be monitored at all times.

Licence holders should refer to the examples of principles or practices that may demonstrate compliance found in section [5.1.2.4](#) of this guide.

5.1.3.11 Appropriate measures

As per subsection 72(2) of the *Cannabis Regulations*, the holder of the licence must determine the appropriate measures to be taken if any occurrence referred to in section 70 or section 71 is detected.

Licence holders should have a procedure in place when an alarm for the intrusion detection system of any operations area or storage area is triggered. Licence holders should refer to section [5.1.2.5](#) of this guide for steps to consider when developing this procedure.

5.1.3.12 Record of detected occurrences

As per subsection 72(3) of the *Cannabis Regulations*, if any such occurrence is detected, the holder of the licence must ensure that a document is retained that contains the date and time of the occurrence and the measures taken in response to the occurrence along with the date and time the measures were taken.

A licence holder should have a procedure for creating and maintaining these records of detected occurrences. Licence holders should refer to section [5.1.2.6](#) of this guide for elements to consider with regards to retaining security related documents.

5.1.4 Retention

As per section 73 of the *Cannabis Regulations*, a holder of a licence referred to in subsection 62(1) must retain a visual recording made under section 64 or section 70 for at least one year after the day on which it was made, a document referred to in to in subsection 66(3) or subsection 72(3) for at least two years after the day on which it is prepared, and the information in the record referred to in subsection 68(2) for at least two years after the day on which the information is recorded.

Licence holders may wish to consider the following elements regarding the retention of security related documents:

- The manner in which the record will be retained (electronic or paper)
- The individuals who will have access to the records
- The location where the records will be stored
- Adequate video storage capacity and archiving procedures



General rules and additional record keeping requirements associated with physical security measures are found under Part 11 of the *Cannabis Regulations*. For more information on these requirements, refer to [Appendix B](#).

Table 2: Required retention period for visual recordings, documents and information regarding physical security measures

Security related recordings, documents and information	Minimum required retention period
Visual recordings	1 year after the day on which it is made
Records of detected occurrences	2 years after the day on which it is prepared
Storage area access logs	2 years after the day on which the information is recorded

5.2 Other Licences

The physical security requirements for other licences are stated in Part 4 Division 2 of the *Cannabis Regulations*. This section of the guide outlines the requirements for the other licences in further detail.

Table 3: Physical Security Requirements for Other Licences as per Part 4 Division 2 of the *Cannabis Regulations*

Required physical security measures	Micro-cultivation	Micro-processing	Nursery	Analytical Testing	Research ¹
Site Design	Required as per subsection 74(a)	Required as per subsection 74(a)	Required as per subsection 74(a)	N/A	N/A
Physical Barrier for the Site	Required as per subsection 74(b)	Required as per subsection 74(b)	Required as per subsection 74(b)	N/A	N/A
Physical Barrier for the Storage Area(s)	Required as per subsection 74(c)	Required as per subsection 74(c)	Required as per subsection 74(c)	Required as per subsection 75(a)	N/A
Restricted Access for each Storage Area(s)	Required as per subsection 74(d)	Required as per subsection 74(d)	Required as per subsection 74(d)	Required as per subsection 75(b)	N/A
Operations Area Design	N/A	N/A	N/A	N/A	Required as per section 77

¹ Additional physical security measure requirements may be imposed as licence conditions depending on the type of activities proposed to be conducted with cannabis and the quantity of cannabis on-site.

5.2.1 *Micro-cultivation, micro-processing and nursery*

A holder of a licence for micro-cultivation, micro-processing or a nursery must ensure that the security measures specified as per section 74 of the *Cannabis Regulations* are complied with in respect of the site set out in the licence. This section of the guide outlines the requirements in section 74 in further detail.

5.2.1.1 *Site design*

As per subsection 74(a) of the *Cannabis Regulations*, the site must be designed in a manner that prevents unauthorized access.

The site includes all areas within the defined perimeter. It is up to the licence holder to indicate their proposed perimeter. The licence holder should consider the [rings of protection concept](#) when designing the site.

Licence holders should refer to section [5.1.1](#) of this guide for additional information regarding site design.



To change the perimeter of the site after the issuance of a licence, the licence holder must submit an amendment application for a change requiring approval. Refer to the [Cannabis Licence Management Guide](#) for more information.

5.2.1.2 *Physical barrier for the site*

As per subsection 74(b) of the *Cannabis Regulations*, the site must be surrounded by a physical barrier that prevents unauthorized access.

The physical barrier should be continuous, and it should surround the **entire** site.

Licence holders should refer to the examples of principles or practices that may demonstrate compliance found in section [5.1.3.4](#) of this guide.

5.2.1.3 *Physical barrier for the storage area(s)*

As per subsection 74(c) of the *Cannabis Regulations*, the storage areas must be surrounded by a physical barrier that prevents unauthorized access.

The physical barrier should be continuous, and it should surround the **entire** storage area.

Licence holders should refer to the examples of principles or practices that may demonstrate compliance found in section [5.1.3.4](#) of this guide.

5.2.1.4 *Restricted access*

As per subsection 74(d) of the *Cannabis Regulations*, access to each storage area must be restricted to individuals whose presence in the area is required by their duties.

Licence holders should refer to the examples of principles or practices that may demonstrate compliance found in section [5.1.3.2](#) of this guide.

5.2.2 Analytical Testing

A holder of a licence for analytical testing must ensure that the security measures specified as per section 75 of the *Cannabis Regulations* are complied with in respect of the site set out in the licence. This section of the guide outlines the requirements in section 75 in further detail.

5.2.2.1 Physical barrier for the storage area(s)

As per subsection 75(a) of the *Cannabis Regulations*, storage areas must be surrounded by a physical barrier that prevents unauthorized access.

The physical barrier should be continuous, and it should surround the **entire** storage area.

Licence holder should refer to the examples of principles or practices that may demonstrate compliance found in section [5.1.3.4](#) of this guide.

5.2.2.2 Restricted access

As per subsection 75(b) of the *Cannabis Regulations*, access to each storage area must be restricted to individuals whose presence in the area is required by their duties.

Licence holders should refer to the examples of principles or practices that may demonstrate compliance found in section [5.1.3.2](#) of this guide.

5.2.3 Research

As per section 77 of the *Cannabis Regulations*, a holder of a licence for research must ensure that operations areas at the site set out in the licence are designed in a manner that prevents unauthorized access.

Although specific physical security measures are not prescribed for operations areas under this licence class, a licence holder may wish to consider some aspects and parts of section [5.1.3](#) in this guide.

Examples of principles or practices that may demonstrate compliance with section 77 are as follows:

- Access restriction on all access points
 - Refer to section [5.1.3.2](#) of this guide for information regarding access restriction.
- Physical barriers such as doors and walls
 - Refer to section [5.1.3.4](#) of this guide for information regarding physical barriers.



Additional conditions such as increased physical security measures may be included on the licence depending on the type of activities proposed to be conducted with cannabis and the quantity of cannabis on-site.

5.2.4 Sale for medical purposes without possession

Physical security requirements do not apply to licences for sale of medical purposes **without possession**. However, holders of this licence are still required to meet physical security related requirements set out in Part 2: Licensing and Part 11: Retention of Documents and Information of the *Cannabis Regulations*.

Refer to the [Appendix A](#) and [Appendix B](#) for more information on physical security related requirements set out in Part 2: Licensing and Part 11: Retention of Documents and Information of the *Cannabis Regulations*.

6.0 Contact us

Applicants and licence holders who have questions about the information in this guide are invited to contact Health Canada at HC.licensing-cannabis-licences.SC@canada.ca.

Applicants and licence holders for analytical testing and research licences who have questions about the information in this guide are invited to contact Health Canada at hc.sp-licensing-cannabis-licences-sp.sc@canada.ca.

For other general questions about the *Cannabis Act* and its Regulations, email: cannabis@canada.ca.

Alternatively, the Controlled Substances and Cannabis Branch may be contacted by phone at 1-866-337-7705.

7.0 Feedback—Help us improve

Health Canada is committed to providing all stakeholders with timely, accurate and reliable information. This includes providing applicants and licence holders with the information they need to comply with the Act and its Regulations.

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 cannabis@canada.ca and indicate in the subject line Feedback on the Physical Security Measures Guide for Cannabis.

Your comments will help us improve this guide.

Appendix A: Part 2 — Licensing requirements related to physical security measures

This appendix provides requirements and additional information pertaining to the head of security (section 38) and organizational security plan (section 45)

Table 4: Head of Security Requirements

Section of the <i>Cannabis Regulations</i>	Requirements and additional information
Head of security (subsection 38(1))	<ul style="list-style-type: none"> • Licence holders must retain the services of one individual as a head of security. • A licence for analytical testing or a licence for research does not need a head of security. • The head of security is responsible for ensuring that applicable physical security measures set out in Part 4 are complied with. Also, the head of security is responsible for the organizational security plan of the holder. • More information on the organizational security plan can be found in the Cannabis Licensing Application Guide. • The head of security may also hold other roles named in the <i>Cannabis Regulations</i> such as responsible person, master grower, and quality assurance person.
Alternate (subsection 38(2))	<ul style="list-style-type: none"> • Licence holders may have one alternate head of security who are qualified to replace the head of security (e.g., during vacation, illness, etc.). • At any given time, there can only be one person acting as the head of security for a licence holder. • A licence holder may have employees in addition to the head of security who are assigned some aspects of the organizational security plan; however, the ultimate responsibility of the organizational security plan lies with the head of security.

Table 5: Requirements for the organizational security plan

Section of the <i>Cannabis Regulations</i>	Requirements and additional information
Organizational Security Plan (section 45 and section 230)	<ul style="list-style-type: none">• Refer to the Cannabis Licensing Application Guide for more details on the organizational security plan.

Appendix B: Part 11 — Retention of Documents and Information requirements related to physical security measures

This appendix summarizes the record keeping requirements pertaining to physical security measures.

Table 6: Retention of documents and information required under Part 11 associated with licensing requirements under Part 2 and physical security measure requirements under Part 4 of the *Cannabis Regulations*.

Retention of documents and information (Section # of the <i>Cannabis Regulations</i>)	Requirements
Manner of retention (section 221)	<p>A person that is required to retain a document or information — or that must ensure that a document or information is retained — under the <i>Cannabis Regulations</i>, including the documents and information under section 73, must ensure that the document or information is retained in a manner that will enable an audit of it to be made in a time manner and if a person holds a licence, the document or information is available at the site specified in the licence.</p> <p>If a person does not hold a licence, the documents and information must be available at their place of business in Canada, or if they do not have such a place of business, at a place of business in Canada.</p>
Requirement to continue to retain (section 222)	<p>If a person ceases to hold a licence, they must, in respect of any document or information that they were required to retain under the <i>Cannabis Regulations</i> and for which the retention period has not yet ended, ensure that the document or information continues to be retained until the end of the retention period and provide the Minister with notice in writing of the address of the location at which the documents or information is retained and of any subsequent change to the address.</p>
Organizational security plan (section 230)	<p>Licence holders, other than a holder of a licence for analytical testing or a licence for research, must retain a copy of any organizational security plan that they submit to the Minister — including any updated plan referred to in section 45 — for at least two years after the day on which the plan is replaced by an updated plan or, if the plan has not been replaced, at least two years after the day on which the licence expires or is revoked.</p>