

April 9, 2018

To Whom It May Concern:

My name is Dr. Ryan Sommers and I am a family physician in Truro, Nova Scotia and the Regional Medical Officer of Health for the Northern Zone, Nova Scotia Health Authority. Medical Officers of Health have a legislated role in Nova Scotia to protect the public's health<sup>1,2</sup> the purpose of this letter is to provide my feedback to the Law Amendments committee about the recently introduced Cannabis Control Act – Bill 108.

It is encouraging that the Nova Scotia Government has adopted an approach to cannabis similar to recommendations made by a number of organizations that have proposed a public health approach to cannabis. The creation of a government monopoly, prohibiting the operation of vehicles while under the influence of cannabis, and prohibiting public consumption of cannabis in public place are a few examples of how this proposed legislation will help minimize the harms from cannabis and to protect the health of all Nova Scotians.

While the legislation expands the Smoke Free Places Act to include the public consumption of cannabis, there is a significant opportunity to provide further enhancements and protections from the harms of cannabis. Compared to other proposed provincial and territorial cannabis legislation, the Nova Scotia Cannabis and Control Act can be further enriched by banning the use of Cannabis in all public settings. Six other provinces (Newfoundland, New Brunswick, Ontario, Saskatchewan, Yukon and the Northwest Territories) have banned the public consumption of cannabis. For more information on how the Cannabis Control Act compares to other jurisdictions please visit:

<http://www.ccsa.ca/Resource%20Library/CCSA-Canadian-Provincial-Territorial-Cannabis-Regulations-Summary-2018-en.pdf>.

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<sup>1</sup> An Act to Provide for the Protection of Health. Government of Nova Scotia. 2016. Available: [nslegislature.ca/legc/statutes/health%20protection.pdf](https://www.novascotia.ca/legc/statutes/health%20protection.pdf) [5 Sep 2017].

<sup>2</sup> A Guide to the Health Protection Act and Regulations. Nova Scotia Health. 2005. Available: <https://novascotia.ca/dhw/.../Guide-to-the-Health-Protection-Act-and-Regulations.pdf> [5 Sep 2017].

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A universal approach to public consumption will ensure all communities are protected from the harms of cannabis. The current legislation would require municipalities to create bylaws for their own jurisdictions. I am very concerned this will result in a mismatch of rules and regulations and could impact our efforts to prevent the normalization of cannabis use in children and youth. A complete ban on the public consumption of cannabis will also provide citizens and visitors with clear messages on where cannabis can be consumed in our province. Finally, enhanced legislation would mean the Cannabis Control act would be similar to many other Canadian jurisdictions.

Nova Scotia has a long history of taking the lead in creating legislation that protects our communities from the negative secondary hand exposure from harmful products. Our province was one of the first provincial jurisdictions in Canada to introduce legislation that banned smoking in public places. This was one of the first stepping-stones for the creation of similar policies in other parts the country. ***It is my recommendation, as a specialist in public health and preventive medicine, that the Government of Nova Scotia bans the consumptions of cannabis in all public settings.*** Let's continue being leaders in public health and take bold and immediate measures to ensure that the health of all Nova Scotians are protected from the negative harms of cannabis.

Please contact me if you have any comments or questions.

Sincerely,



Dr. Ryan Sommers, MD CCFP FRCPC (PHPM)  
Medical Officer of Health Northern Zone, Nova Scotia Health Authority