

April 8, 2018

Law Amendments

PURPOSE

On behalf of the Northern Zone Community Health Boards of the Nova Scotia Health Authority (NSHA) this letter outlines our recommendations for consideration on the proposed legalization framework for the usage, sale, and marketing of recreational cannabis products. Our recommendations are based on evidence and are aligned with the IWK Health Centre, Public Health Association of Nova Scotia, and Injury Free Nova Scotia.

We have great concerns with the existing proposal particularly with respect to where cannabis can be smoked. We are pleased with the expanded Smoke Free Places Act however we don't believe that alone is enough to protect society particularly our youth from the harms of cannabis. We feel consuming cannabis should be limited to personal residences with the possibility of increasing to other designated locations in future.

The objectives of Bill C-45, the Act respecting cannabis are to:

- Prevent young persons from accessing cannabis
- Protect public health and safety
- Deter criminal activity; and
- Reduce the burden on the criminal justice system.

To achieve the objectives of Bill C-45, the Province of Nova Scotia must consider a public health approach to cannabis as it becomes legalized. The health of the public must take precedence over revenue generation if related harms are to be minimized and our children safe-guarded. The goal of a public health approach is to maximize benefits and minimize harms, promote the health and wellness of all members of a population, reduce inequities within the population, and ensure that the harms associated with interventions and laws are not disproportionate to the harms of the substance themselves.

WHAT WE KNOW

The use of cannabis by youth has side effects that can seriously limit their educational, occupational and social development. The evidence also describes the link to negative neurological and cognitive effects (memory, attention and psychomotor speed) and effects on mental health. Finally, the evidence describes the regular-use of cannabis in adolescence to be associated with low-levels of education attainment, diminished life satisfaction, higher likelihood of developing cannabis-use related disorders and an increased risk of developing mental health problems later on in life. (3) Unfortunately research also states that youth between the ages of 15 and 25 have the highest rate of use. (5)

We urge the Province of Nova Scotia to establish strict regulations that govern access to cannabis and cannabis products, as well as the marketing and advertising of these products. We recommend that the legalization framework for cannabis take a public health approach (further outlined in our recommendations). Taking a public health approach will ensure that all decisions are made in light of the best available evidence. A public health approach is essential to minimize the harms associated with

cannabis use. It also sets the health of Nova Scotians as the priority, thus increasing our collective productivity, in turn contributing to the prosperity of Nova Scotia.

We recommend the following points which are also outlined by many of our provincial partners including: IWK Health Centre; Nova Scotia Health Authority; Injury Free Nova Scotia; Smoke Free Nova Scotia; Public Health Agency of Nova Scotia; and CHB Council of Chairs for the Western & Eastern Zone. We recommend that:

- Advertising, marketing and sponsorship of ALL cannabis, cannabis products and cannabis companies should be prohibited as this could have negative impacts on children.
- Child proof packaging be required on all products to minimize the risk of child-poisoning.
- A limit be placed on the types of products available to minimize the appeal to children and youth (i.e. candy, chocolate bars, cookies, or other products that target children and youth).
- Strict guidelines and limitations on packaging be implemented to minimize the appeal to children and youth.
- Labels should include the health risks of using the product (as does tobacco packaging).
- Retail outlets not be located close to schools, playgrounds, community centers and other places where children and youth are in close proximity.
- Restrict use of cannabis products (smoke-form and edibles) to residential use only.

More to the point, our CHBs are concerned about what could happen in lieu of a government monopoly (and marketing regulations). A frequently cited concern with legalization is that: "... it will allow the rise of Big Cannabis similar to Big Tobacco and Big Alcohol. These powerful multi-national corporations have revenues, and market expansion as their primary goals, with little consideration of the impact on public health. They increase tobacco and alcohol use by lobbying for favorable regulations and funding huge marketing campaigns. It is important that the regulations actively work against the establishment of Big Cannabis." (2)

ABOUT THE CHBs

CHBs are a committed group of volunteers that support the work of the NSHA by advising on local perspectives, trends, issues and priorities. They contribute to health-system accountability by facilitating an exchange of information and feedback between the community and the NSHA (Health Authorities Act, Section 62). There are currently 37 CHBs in Nova Scotia and CHB members must live within the boundaries of the community that the CHB represents. CHB members are recognized volunteers of the NSHA, guided by the NSHA vision and mission.

<https://www.communityhealthboards.ns.ca/>

The Northern Zone Community Health Boards strongly believe that a portion of the revenue should be used for health promotion, surveillance, unintended consequences, and associated costs. We appreciate the rationale behind legalization of non-medical cannabis, but we want to keep Nova Scotians as safe as possible. Legal does not mean safe.

Community Health Boards are committed to the promotion of wellness and addressing concerns in our communities which have a negative impact on our health. We believe that in the process of legalization

our government must give immediate priority to understanding and educating the public about the risks associated with cannabis. This important work must happen now as we prepare for the availability of legal cannabis. This important work must happen now as we prepare for the availability of legal cannabis for recreational use and cannot be postponed to some late date after revenue from the product becomes available. We recommend an immediate investment in research and education.

Finally, aligning with past healthy public health policy efforts, we also recommend that:

- Smoking and vaping of cannabis be aligned with existing smoke-free policy (i.e. smoking or inhaling cannabis products be prohibited in public places).
- Smoke-free policies in provincially owned spaces be further enhanced to include such locations as parks, beaches, and walking trails.
- Set the price high enough to reduce demand and low enough to undercut the illegal market.
- Regulations and sanctions be such that they deter cannabis use and driving (ex. In the absence of conclusive and accepted standards implement a zero-tolerance cannabis use in vehicles, higher sanctions, probation)
- Educate, empower and support police partners on the enforcement of driving under the influence laws and smoke-free places act.
- Offer concerted education to all health care providers.

Respectfully submitted

Along the Shore CHB

East Hants CHB

North Shore and Area CHB

Pictou Central and East CHB

Pictou West CHB

Pugwash and Area CHB

SOAR (Springhill, Oxford, Amherst and Region) CHB

South Colchester CHB

SPAR (Southampton, Parrsboro, Advocate and Region) CHB

Truro and Area CHB

Bill Schurman

Chair, Northern Zone CHB

Council of Chairs

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Positions reviewed referenced and supported.

References Cited:

1. Canadian Public Health Association. (2016) A Public Health approach to the Legalization, Regulation and Restriction of Access to Cannabis. Retrieved from <https://www.cpha.ca/public-health-approach-legalization-regulation-and-restriction-access-cannabis>
2. (Cannabis Legalization: adhering to public health best practice Sheryl Spithoff, Brian Emerson, Andrea Spithoff CMAJ. 2015 Nov 3; 187(16): 1211-1216 doi:10.1503/cmaj.150657 PMID: PMC4627877)
<http://www.cmaj.ca/content/early/2015/09/21/cmaj.150657.full.pdf+html>
3. Centre for Addiction and Mental Health (2014) Cannabis policy framework retrieved from https://www.camh.ca/en/hospital/about_camh/influencing_public_policy/documents/camhcanabispolicyframework.pdf
4. Recommendations for a regulatory framework for the legalization of cannabis: issued by the IWK Health Centre retrieved from <https://www.ifns.ca/images/stories/documents/Cannabis/IWK%20Cannabis%20Legalization%20Recommendations%20FINAL.pdf>
5. Substance Abuse in Canada 2015 The Effects of Cannabis Use During Adolescence; The Canadian Centre on Substance Abuse retrieved from <http://www.ccsa.ca/Resource%20Library/CCSA-Effects-of-Cannabis-Use-during-Adolescence-Report-2015-en.pdf>