



Smoke-Free Nova Scotia Position on Federal Legalization and Regulation of Cannabis

Smoke-Free Nova Scotia is a provincial coalition of health organizations committed to the reduced use of tobacco industry products and their harms in Nova Scotia.

As such our position regarding the legalization and regulation of Cannabis is limited to those aspects related to the physical and mental harms caused by smoking or inhaling Cannabis and the re-normalization of smoking and tobacco use. This includes:

- smoking Cannabis or inhaling heated Cannabis products using devices including, but not limited to, e-cigarettes, vapes, bongs and waterpipes /hookah
- prohibiting smoking or inhaling Cannabis products in public places where tobacco smoking and e-cigarette and waterpipe/hookah use are prohibited under Nova Scotia's Smoke-Free Places Act
- regulating Cannabis sales, marketing, display, advertising, promotion, accessibility and product formulation, including flavouring, similar to the regulation of tobacco, e-cigarettes and waterpipe/hookah products under Nova Scotia's Tobacco Access Act

Public smoking or inhalation of Cannabis could re-normalize smoking of tobacco products, and promote use of e-cigarettes or vapes and waterpipes/hookah for Cannabis use which also re-normalize smoking, particularly among children and youth. The smoking or inhalation of Cannabis has proven physical risks for all ages and mental health risks, particularly for adolescents and people with a personal or family history of mental illness.

Other tobacco control policies that have been shown to successfully prevent and reduce use and support effective treatment should be put in place to regulate Cannabis. These could include high prices through regulation or taxation, retail outlet density, location, hours of sale, accessibility (e.g. minimum age requirements, and pricing of high potency products), targeted education and health promotion that sensitize the public – particularly vulnerable groups – to the harms and risks of Cannabis use, as well as access to effective treatment options for those who want to stop using Cannabis.

SFNS recognizes that other health organizations' positions may include many other aspects of the issue.

The Centre for Addiction and Mental Health, *Cannabis Policy Framework* (2014)¹ excerpts below explain some of the **health risks associated with Cannabis use**, that are similar to the risks of smoking, particularly for youth:

¹ Centre for Addiction and Mental Health. *Cannabis Policy Framework* (2014). Accessed Feb. 1 2016 from http://www.camh.ca/en/hospital/about_camh/influencing_public_policy/documents/camhCannabispolicyframework.pdf

Like tobacco, Cannabis smoke contains tar and other known cancer-causing agents. Regular, long-term Cannabis smoking is linked to bronchitis and cancer. Cannabis smokers often hold unfiltered smoke in their lungs for maximum effect, which adds to these risks. About half of past-year users also smoke tobacco and it is likely that tobacco smoking contributes greatly to – or is the primary cause of – many of these respiratory problems.

There is also a strong and growing body of evidence that regular Cannabis use in adolescence can seriously harm the developing brain. Early regular Cannabis use is associated with low levels of educational attainment, diminished life satisfaction, higher likelihood of developing Cannabis use disorder, and increased risk of developing mental health problems. Several studies have suggested that Cannabis use before the age of 18 increases the risk of developing schizophrenia. And while the cognitive problems associated with regular Cannabis use diminish after about a month of non-use for adults, these effects may not be reversible in adolescent users.

Legalization of Cannabis, combined with strict health-focused regulation, provides an opportunity to reduce the harms associated with Cannabis use.

SFNS endorses the Centre for Addiction and Mental Health (CAMH) ten basic principles to guide regulation of legal Cannabis use quoted below. These should be considered a starting point – minimum requirements for a public health-focused regulatory framework.

- 1) **Establish a government monopoly on sales.** Control board entities with a social responsibility mandate provide an effective means of controlling consumption and reducing harm.
- 2) **Set a minimum age for Cannabis purchase and consumption.** Sales or supply of Cannabis products to underage individuals should be penalized.
- 3) **Limit availability.** Place caps on retail density and limits on hours of sale.
- 4) **Curb demand through pricing.** Pricing policy should curb demand for Cannabis while minimizing the opportunity for continuation of lucrative black markets. It should also encourage use of lower-harm products over higher-harm products.
- 5) **Curtail higher-risk products and formulations.** This would include higher-potency formulations and products designed to appeal to youth.
- 6) **Prohibit marketing, advertising, and sponsorship.** Products should be sold in plain packaging with warnings about risks of use.
- 7) **Clearly display product information.** In particular, products should be tested and labelled for THC and CBD (cannabidiol) content.
- 9) **Enhance access to treatment and expand treatment options.** Include a spectrum of options from brief interventions for at-risk users to more intensive interventions.

10) **Invest in education and prevention.** Both general (e.g. to promote lower-risk Cannabis use guidelines) and targeted (e.g. to raise awareness of the risks to specific groups, such as adolescents or people with a personal or family history of mental illness) initiatives are needed.

A successful public health approach would embed these policies and interventions in a comprehensive strategy that includes research, knowledge exchange, and evaluation. A portion of government revenues from Cannabis should be formally dedicated to these activities.

To reduce harm, legalization of Cannabis is a necessary – but not a sufficient – condition. It must include effective controls on availability and regulations that steer users towards less harmful products and practices. It must be embedded in a comprehensive strategy with a strong prevention focus and a range of interventions aimed at groups at higher risk of harm, such as youth and people with a personal or family history of mental illness. Finding the right mode and balance of regulation, and effectively implementing and enforcing them, will be key to ensuring that this approach results in a net benefit to public health and safety. Such a model appears to be the healthiest and most sensible way forward.

The Canadian Centre on Substance Abuse (CCSA) report, *Cannabis Regulation: Lessons Learned in Colorado and Washington State* (2015)², provides the following guidance regarding how to create and implement effective Cannabis regulations.

The need to invest in effective implementation was a common message of stakeholders in both Colorado and Washington. They highlighted the value of allocating a portion of funds generated through retail sales to education, prevention, treatment and research. They also emphasized the need to ensure proactive investment to build capacity before the new regulations are implemented and retail sales begin. These investments fall into several common themes:

- Take the time required to develop an effective framework for implementation and to prepare for a successful launch. Colorado stakeholders recommended taking longer than the one-year period provided in that state. There is also a need to give retailers time to develop capacity to meet consumer demand. Washington stakeholders encountered price escalation as retailers struggled to obtain or produce product within two months of receiving licenses;
- Develop the capacity to administer the regulatory framework, recognizing that a significant investment in staff and administration is required to process licenses, conduct comprehensive inspections and address violations;

² Canadian Centre for Substance Abuse. *Cannabis Regulation: Lessons Learned in Colorado and Washington State* (2015) accessed Feb 1 2016 from <http://www.ccsa.ca/Resource%20Library/CCSA-Cannabis-Regulation-Lessons-Learned-Report-2015-en.pdf>



- Provide strong central leadership and promote collaboration to bring diverse partners to the table from the beginning and to promote open, consistent communication and collaborative problem-solving;
- Invest proactively in a public health approach that builds capacity in prevention, education and treatment before implementation to minimize negative health and social impacts associated with Cannabis use;
- Develop a clear, comprehensive communication strategy to convey details of the regulations prior to implementation, so that the public and other stakeholders understand what is permitted, as well as the risks and harms associated with use, so that individuals can make informed choices;
- Ensure consistent enforcement of regulations by investing in training and tools for those responsible for enforcement, particularly to prevent and address impaired driving and diversion to youth, and to control the black market;
- Invest in research to establish the evidence base underlying the regulations, and to address gaps in knowledge, such as new and emerging trends and patterns of use; and
- Conduct rigorous, ongoing data collection, including gathering baseline data, to monitor the impact of the regulatory framework and inform gradual change to best meet policy objectives and reduce negative impacts.

In summary, the consistent message CCSA heard was that any jurisdiction considering regulatory changes to Cannabis policy should take the time to set up the infrastructure and allocate the resources needed.

To recap, Smoke-Free Nova Scotia's position is confined to Cannabis smoking and inhalation. The Coalition suggests the application of tobacco control policies to Cannabis such as minimum age requirements, prohibition of use in public places, marketing and promotion restrictions, and other regulations consistent with those within Nova Scotia's Smoke-Free Places and Tobacco Access Acts. Sufficient time for planning a framework for implementation, evaluation and enforcement is necessary for the effective regulation and monitoring of Cannabis use and access. The recommendations are intended to protect Nova Scotians and all Canadians against the harms of Cannabis inhalation and smoking as well as prevent undermining existing tobacco control policies.

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