



Healthy Albertans
Healthy Communities
Together.



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Dear Municipal Elected Officials and Leaders

Re: Legalization of Edibles, Extracts and Topicals (EET) - Information for Municipalities

I am pleased to provide you with the attached resource titled: *Phase Two of Cannabis Legalization - Edibles, Extracts and Topicals, Public Health Information for Municipalities*. Phase 2 of the federal government plan to legalize and regulate Edibles, Extracts and Topical (EET) forms of cannabis began on October 17, 2019, when the Cannabis Act was amended. Legal EET products are expected to be available in regulated cannabis retail stores by mid-January 2020. The legalization of EETs, three new and/or expanded classes of cannabis products, will have an impact on your existing local bylaws regarding consumption of cannabis in public places.

Alberta Health Services (AHS) advises that a precautionary approach be taken to minimize substance use harms and unintended consequences. This approach recognizes that it is easier to relax or remove restrictions at a later date than to tighten them after decisions have been announced, bylaws have been enacted, and investments have been made. This precautionary approach is consistent with the recommendations of the Federal Task Force on the Legalization and Regulation of Cannabis (Government of Canada, 2016). It applies the wisdom and lessons learned from alcohol and tobacco policy, which is to begin with more restrictive regulations and ease restrictions only as evidence becomes available.

AHS has developed the attached resource for municipalities to provide relevant information to assist in developing or revising local bylaws. This document outlines how EET may impact local regulations and how you can use this opportunity to strengthen or create new bylaws, based on a public health approach. It addresses consumption in public places, medical exemptions, multi-unit housing and festivals.

The location, method and accumulated volume of cannabis consumption can create a number of concerns, including increased youth access and increased normalization among youth due to increased visibility and exposure. Public consumption bylaws have the potential to protect the community and its citizens. Effective regulation, as identified in the intent behind federal legalization, supports federal and provincial goals to keep cannabis out of the hands of youth and to protect public health and safety.

AHS recognizes municipalities as important partners in public health. If you would like more information or support as you and your Council consider the impact of EET on your local bylaws, please feel free to contact me directly.

Sincerely,

Original Signed

Dr. Albert de Villiers, Medical Officer of Health
North Zone Lead, North Zone-West (Areas 1, 2, 3, 9)
www.albertahealthservices.ca

Attached: Phase Two of Cannabis Legalization - Edibles, Extracts and Topicals, Public Health Information for Municipalities

SPECIFIC CONSIDERATIONS IMPACTING PUBLIC CONSUMPTION DECISIONS

MULTI-UNIT HOUSING RESIDENTS

If cannabis consumption is only allowed in private units/residences, some of which have no-smoking/vaping rules, does this disadvantage multi-unit housing residents' ability to consume cannabis?

- All residents have the option of consuming other forms of cannabis in their private units, such as: edibles, drinks, capsules, sprays, or tinctures.
- As with tobacco, multi-unit housing complexes are advised to have smoke-free and vape-free indoor spaces and provide outdoor designated areas on common property for smoked or vaped products, five or more meters away from doors, windows and fresh-air intakes. If the complex is not smoke free, residents can request designated outdoor smoking and vaping areas to ensure the health and safety of all residents.

What if residents want the fast-acting effects that smoking/vaping cannabis provides?

- There are alternative products that have similar effects without the harmful effects of second-hand smoke or vapour.
- Residents can use outdoor designated consumption areas as recommended above.

FESTIVALS

Should festivals allow public consumption in the form of "cannabis gardens" (similar to beer gardens)?

- The most protective option and best way to reduce short and long-term health and social harms is to not allow cannabis gardens, because:
 - It normalizes consumption. Normalization means that a behavior or activity becomes a 'normal part' of leisure and lifestyle and is no longer considered potentially harmful. The more often use is normalized and permitted, particularly in public spaces, the greater the risk of health and social harms to communities.
 - Children tend to copy what they observe and normalizing smoking behaviour is of particular concern. As seen with alcohol and tobacco, normalization leads to increases in rates of use, including associated harms.
 - Of potential noise and nuisance complaints. For example, the City of Hague, Netherlands now restricts public consumption because of the many complaints from residents and visitors regarding smell and noise.² The Calgary Stampede has designated their event as family friendly, by banning on-site consumption.¹⁶ The Vancouver Park Board has banned 4/20 events because of the negative impact on residents, parks and facilities.¹⁷
- There may be liability for festival organizers due to risk of harm related to intoxication.

Since people will smoke/vape in the general festival space anyway, wouldn't having a designated space for smoking/vaping be a better option?

- The most protective option for the public is to prohibit public consumption.
- AHS, in collaboration with municipalities, will review and monitor harms over time. Recommendations and practices could shift as we learn more.

VAPING

Is vaping a safer form of consumption?

- Vaping is not without risks and the health impacts are not fully understood. Vaping may also result in more frequent use and use of higher THC products.¹³
- Harms related to vaping may include severe lung disease, however at the time of this writing not enough is known about these emerging cases to understand the cause or full extent of the risks and harm.
- There is no evidence that second-hand exposure to vapour is safe, thus a precautionary approach is advised.

MEDICAL EXEMPTIONS ARE REQUIRED

- There are many different forms of cannabis products that medical users can choose from, particularly that do not involve smoking or vaping of the product.
- The Canadian Medical Association does not support combustible products as initial prescribed product for medical purposes, as alternative forms are available that minimize health risks to the patient and second hand exposure risks to those around them.¹⁵