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Dear M Bishoff and P Nash,

Re: Changes to Calgary's Business Licensing Bylaw to Allow for Cannabis Sales at Minor's Prohibited Events

Thank you for the opportunity to provide suggestions on mitigation measures to address potential health concerns arising by the proposed change by City of Calgary to allow for temporary cannabis stores at minors prohibited events.

The availability of cannabis sales in conjunction with alcohol sales at events increases the potential for co-use of alcohol and cannabis with increased intoxication and impairment. Combining alcohol with cannabis greatly increases the level of impairment and the risk of injury and should be avoided. Current recommendations from [AGLC](#), [Health Canada](#), [Drugsafe.ca](#) and the [Council of Chief Medical Officers of Health](#) all strongly advise against co-use or mixing of cannabis and alcohol.

Options or approaches used in other jurisdictions to reduce the potential for co-use of alcohol and cannabis and increased impairment/intoxication at minors prohibited events that allow cannabis sales include:

- 1) **Restricting sales to either alcohol or cannabis at an event.** Event organizer chooses between either cannabis or alcohol sales for the event.
- 2) **Reduce the potential for individuals to consume both alcohol and cannabis at the events.** AGLC license requirements require physical separation between the area where alcohol sales and consumption are allowed and the area where cannabis sales occur. To further enhance this protective measure against co-use, the location of the approved cannabis consumption area should be physically separate and distinct from the area where alcohol sales and consumption is occurring. Measures used in other jurisdictions to help servers identify and reduce the risk of co-use include the use of wrist bands. An option that is being used in BC is to have individuals at the time of entry into a minors prohibited event identify whether they are going to be consuming alcohol or cannabis. They are then provided with the appropriate wrist band that the servers can then use as a visual identification when serving individuals.

Other mitigation measures that City of Calgary and AGLC may wish to consider as part of the AGLC retail cannabis license extension, business licensing requirements for temporary cannabis sales and/or the event approval by the Interdepartmental Event Team (IET) are:

Calgary • Southport • Population and Public Health • Promoting Health • Medical Officer of Health
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Calgary AB T2W 1S7
www.albertahealthservices.com

- 3) **Limit the potency, product types and amount/volume limits to reduce potential harms and adverse effects for new cannabis users.** Unlike a retail store where the retailers have more time to explain the differences and effects between cannabis products and including THC concentration, servers at an event will have limited time to educate inexperienced users. The types and potency of the products should be limited to those with lower THC levels, lower total THC amounts in a serving and those with higher CBD to THC ratios. Currently, temporary stores can sell any of the products their physical location sells including high potency products with THC concentration over 90%. These types of products represent significant risks for inexperienced cannabis users and for young users, 18 to 25 year olds, whose brains are still developing. Their use is highly intoxicating and inconsistent with the [Lower Risk Cannabis Guidelines](#) endorsed by AGLC and Health Canada. While the [AGLC Cannabis Retailer Handbook](#) requires that the Health Canada Consumer Educational sheet must be made available to each consumer, it will be important for AGLC/City of Calgary to monitor that this occurs at temporary cannabis stores at minor prohibited events. The sheet contains important information such that it can take up to 4 hours to feel the effects of eating or drinking cannabis and the effects including impairment can last up to 12 hours.
- 4) **Ensure Compliance with Health Canada and AGLC restrictions limiting the appeal and promotions to Young Persons.** Both Health Canada and AGLC have specific requirements to limit promotional activity appealing to young persons. It will be important to ensure compliance with those regulations. AHS, City of Calgary, AGLC and Health Canada are aware of a cannabis industry event in Calgary in 2024 where two people needed to receive emergency medical care when they were provided free cannabis products contrary to regulations. Jurisdictional gaps, lack of capacity and authority to monitor and enforce compliance with the requirements were issues identified in follow up of the incident. With the change to allow temporary cannabis sales, clarity on the accountability and confirmation of the capacity and responsibility for enforcement between AGLC, City of Calgary and Health Canada will be important. There may need to be conditions added to event permits/licenses to support regulatory activities and enforcement actions related to the sales and consumption areas.
- 5) **Ensure temporary cannabis retail outlets comply with required provincial and municipal setbacks from schools, healthcare facilities and other areas where minors are present for physical cannabis stores.** Licensing and event approvals should require temporary cannabis retail outlets comply with the same restrictions including set back distances and retailer concentration that are in place for cannabis retail stores.
- 6) **Ensure events that include temporary cannabis stores have the appropriate health and safety plans in place.** Temporary cannabis retail outlets at minors prohibited events where alcohol is also available, increase the likelihood of intoxication and the associated harms. Event plans should include the appropriate security plans including necessary staffing to manage/prevent potential increases in intoxication. There should be strategies to reduce impaired driving by promoting safe means to get home. Cannabis consumption areas should minimize secondhand exposure risks. There should be appropriate health and first aid staffing to deal with intoxication and the use of cannabis, alcohol and other substances. Event plans should specifically address cannabis related waste is safely removed.

The City of Calgary Interdepartmental Event Team has established processes that these mitigation measures could be incorporated into for events on City owned land. It is important



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that these measures also apply to other events through the approvals granted by AGLC and the City of Calgary.

Thank you for the opportunity to provide input on AGLC and Calgary's approach to temporary cannabis stores at minors prohibited events.

Sincerely

Brent Friesen

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Chronic Disease Prevention and Harm Reduction, Promoting Health
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