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Dear M Bishoff and P Nash,

Re: Changes to Calgary's Business Licensing Bylaw to Allow for Cannabis Sales at all Ages Events by removing the restriction to Minors Prohibited Events

Thank you for advising us of the July 2025 change to the Alberta Gaming Liquor and Cannabis (AGLC) Cannabis Handbook to allow cannabis sales at all ages festivals and events. AGLC's removal of the restriction or limitation of cannabis sales to minors prohibited events creates significant concerns about the potential for cannabis product promotion to children and youth as well as exposure of children and youth and non-consuming adults to cannabis products.

While current federal and provincial regulations limit appeals and promotions to young people, there are jurisdictional gaps, lack of capacity, and a lack of authority to monitor and enforce compliance with these requirements. Before the City of Calgary amends its Business Bylaw to allow cannabis sales at all ages events, clarity on the accountability, confirmation of the capacity and responsibility for enforcement between AGLC, City of Calgary and Health Canada is necessary based on experience. For instance, 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.

In the absence of clear mechanisms to ensure compliance with provincial and federal legislation pertaining to governing appeals and promotions to young persons, the City of Calgary Business Bylaw should maintain its current restriction on temporary cannabis sales to minors prohibited events despite the change to the AGLC Cannabis Handbook.

If the City of Calgary's decision is to allow cannabis sales at all ages events, the following should be considered as part of the business licensing requirements and/or the event approval by the Interdepartmental Event Team (IET):

- 1) **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 a lack of authority to monitor and enforce compliance with the requirements were issues identified in follow up of the incident. With the change to allow cannabis sales at events, 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.

- 2) **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 to comply with the same restrictions including set back distances and retailer concentration that are in place for cannabis retail stores.
- 3) **Ensure events that allow cannabis sales have the appropriate health and safety plans in place.** Temporary cannabis retail outlets at all ages 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 how cannabis related waste is safely removed.
- 4) **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.

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 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 cannabis sales at all ages events.

Sincerely
Original Signed
Brent Friesen

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Medical Officer of Health
Chronic Disease Prevention and Harm Reduction, Promoting Health