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action on smoking & health

Mayor Naheed Nenshi
City of Calgary
P.O. Box 2100, Stn. M
Calgary, Alberta, Canada T2P 2M5

June 24, 2018

Dear Mayor Nenshi;

Re: Proposed cannabis consumption sites – Agenda Item #9.2.2 for June 25 City Council Meeting

ASH is Western Canada's leading tobacco control organization and we have assisted many municipalities with the development of smoking bylaws over the past four decades.

We have reviewed the Administration Report regarding proposed cannabis consumption sites and here are our recommendations:

1. In the development of guidelines for cannabis consumption sites, Council should consider the potential use of these sites (or similar sites) for *tobacco consumption* (smoking and vaping) when the proposed Smoking Bylaw amendments are brought forward to Council in 2019 Q2.
2. Ideally, restrictions on the public smoking and vaping of cannabis, tobacco and shisha (or any substance) will be *fully aligned* when the Smoking Bylaw amendments are brought to Council.
3. To a child, smoking is smoking whether it involves cannabis, tobacco, shisha, pipes or e-cigarettes. A primary objective of smoking and vaping restrictions (on any substance) should be *to prevent modeling and normalization among children and youth*. Modeling is an essential element of childhood development and Council should ensure that children and youth are not visually exposed to smoking in any public areas that are frequented by minors.
4. Tobacco kills at least *45 times* more Canadians than cannabis according to available estimates. From a public health perspective, any restrictions on the public consumption of cannabis can be easily justified for tobacco consumption.
5. ASH is urging municipal councils to ensure that consumption sites are located at least 50 meters from any public gathering or high traffic area, are well-marked, and are *out of the direct sight of children and youth* (e.g., fenced off).

6. We are also urging councils to *place limits on the size and number consumption sites* (e.g., no more than 50 square meters in size and no more than two per site or event (e.g., one for cannabis consumption and one for tobacco consumption (future)). Unless there are size limitations, an entire event or site could be designated as an approved consumption area.
7. We also recommend an application and approval process for sites and public events such as the one proposed by the City Administration.

Based on our understanding of the Administration Report, there are no stated limits on the size of a consumption site or on the number that can be located at a given site or event.

We support the creation of restricted cannabis consumption sites as a practical step toward the alignment of public restrictions on the smoking or vaping of any substance.

Although Council may have reservations about providing more public areas to consume cannabis, these reservations will likely be put to rest when restrictions on tobacco consumption are fully aligned with cannabis. At this point in time, Council will be treating the smoking and vaping of all legal substances equally including those that kill 45 times more Canadians than cannabis. More importantly, Council will be protecting children and youth from public exposure to the smoking and vaping of all substances.

Please feel free to call me at 780-919-5546 or to send me an email at hagen@ash.ca if you need any further information.

Thank you for your consideration of these recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Les Hagen', with a long horizontal flourish extending to the right.

Les Hagen, MSM
Executive Director