



June 22, 2018

Dear Mayor Nenshi and Councillors:

**Re: Creation of Designated Public Consumption Areas for Non-medical Cannabis**

The City of Calgary's current Cannabis Consumption Bylaw passed on April 5, 2018 reflects and is consistent with Alberta Health Services' (AHS) recommended public health approach to minimize the harms from smoking and vaping non-medical cannabis. Amendments to the bylaw to create public consumption areas for smoking and vaping of cannabis would weaken the protection and prevention measures under the bylaw. Therefore, AHS recommends Council not proceed amending the bylaw for the following reasons:

- It is inconsistent with the public health approach to legalization of cannabis (outlined by AHS)<sup>1</sup> and the recommendation from the Chief Medical Officers of Health of Canada that "public smoking should not be allowed to avoid modelling behavior that could undermine tobacco reduction initiatives, and to prevent second-hand exposure to cannabis smoke and the odor of smoking."<sup>2</sup>
- While AHS acknowledges and supports Council examining whether the Cannabis Consumption Bylaw creates barriers/equity issues (i.e., for homeless populations) and challenges for tourists or renters, these issues are mitigated by there being less harmful forms of cannabis available and accessible for all consumers (e.g., oils). This is consistent with the Government of Canada's policy<sup>3</sup> and Canada's Lower-Risk Use Guidelines to promote less harmful forms of cannabis consumption.<sup>4</sup>
  - The limitations on their ability to use non-medical cannabis would only be for smoked and vaped cannabis. Smoking/vaping have substantial harmful health effects on users and non-users exposed to second hand smoke or vapour.<sup>5 6 7 8</sup>
- There are significant health risks associated with non-medical cannabis.
  - Smoking cannabis has the potential to damage lungs, cause respiratory problems and cardiovascular disease.<sup>9</sup>
  - Cannabis users can experience significant adverse reactions, such as paranoia, panic, increased HR, confusion, nausea/vomiting.
    - 20-30% of recreational users experience intense anxiety and/or panic attacks after smoking cannabis. Panic and phobic attacks are more common in new users and in novel/fun or stressful environments.<sup>10</sup>
    - Cannabis intoxication can produce vivid mental imagery, illusions and hallucinations, and can mimic behaviors associated with psychotic disorders (Allen et al, 2011).<sup>11</sup>
    - Adverse reactions mentioned above are reported by researchers are also often experienced at large scale gatherings in other jurisdictions where non-medical cannabis is legal and at 4/20 events here in Canada.<sup>12</sup>
- Designating public areas for consumption of non-medical cannabis may create future challenges and issues when other cannabis products such as cannabis infused beverages become legal. Alcoholic beverages that cause impairment are not allowed in public, so allowing cannabis beverages would present an inconsistency and/or open the door for repealing effective harm reduction regulations for alcohol.
  - Non-medical cannabis is an intoxicant that results in impairment.<sup>13</sup> Both alcohol and cannabis cause impairment and are major causes of impaired driving and the significant disabilities and deaths impaired driving causes. Outstanding issues such as how to effectively prevent any increase in cannabis impaired driving remain.



- It would be prudent to wait until the provincial regulations governing cannabis consumption lounges are available before considering the creation of additional places for public consumption of cannabis given the concerns with impaired driving and uncertainty how people will travel to and from the designated areas.
- The act of smoking or vaping has the potential to re-normalize tobacco use and normalize cannabis use as it becomes nearly impossible to determine which substance is being used. This would be a step backwards for public health and in the opposite direction of strategies to reduce exposure of children and youth to the portrayal of smoking.
  - Special attention should be directed at areas frequented by children (see AHS recommendations package for detailed list) to reduce normalization of use. Many ideas for designated public consumption areas are those where children and youth are often present such as: parks, off-leash dog parks, playing fields, etc. The presence of persons under age 18 should not be allowed if cannabis is being smoked or vaped.
  - Children tend to copy what they observe and are influenced by normality of any type of smoking around them. This becomes difficult when parks and places children frequent are being considered as consumption areas. An Ontario study showed co-use of cannabis and tobacco has increased among grade 7, 9, and 11 students. In 2011, 92% of tobacco users also used cannabis, up from 16% in 1991<sup>14</sup>. Normalization leads to increases in rates of use, as learned from tobacco and alcohol.

Other issues related to designated public consumption areas that Council should consider include:

- The Vancouver Park Board has banned 4/20 events from Vancouver parks because of concerns over the events impact on residents, parks and facilities. The board issued the following statement "The park board does not believe this event is an appropriate use of park space because it violates our no smoking by-laws and has negative consequences for park users and infrastructure" (April 17, 2018).<sup>15</sup>
- Internationally, public consumption has not been permitted in any jurisdictions that have legalized Cannabis. The City of Hague in Netherlands, where aspects of Cannabis use have been decriminalized, has announced a ban on public consumption of cannabis in 13 areas of the city effective May 1, 2018. The reason given by city officials for the ban is "the many complaints from residents and visitors about the smell of cannabis and the noise of its users".<sup>16</sup>

Based on our review of the currently available evidence, Alberta Health Services recommends against the designation of defined public areas for the public smoking and vaping of non-medical cannabis. The establishment of such public areas would create a number of health and safety concerns including nuisance issues for other users of the designated public places and persons living and working nearby.

Thank you for the opportunity to provide our advice.

Sincerely,

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Tobacco Reduction Program  
Population, Public & Indigenous Health  
Alberta Health Services  
cc. Kurt Hanson, Matthew Zabloski, Debbie Williams

- <sup>1</sup> Predy, G "Public Health Perspectives on Cannabis Legalization in Alberta" AHS's Submission to Alberta Cannabis Secretariat", July 31, 2017
- <sup>2</sup> Chief Medical Officers of Health & Urban Public Health Network, "Public Health Perspectives on Cannabis Policy & Regulation" September 26, 2016
- <sup>3</sup> O'Brien, G Oral Presentation on Canada's Tobacco Strategy, Tobacco Control Directorate, Pan Canadian Tobacco Cessation & Cancer Care Network Mtg, June 20, 2018 Saskatoon, Saskatchewan
- <sup>4</sup> Centre for Addictions and Mental Health. (2017). *Canada's lower-risk cannabis use guidelines*. Available from [http://www.camh.ca/en/research/news\\_and\\_publications/reports\\_and\\_books/Documents/LRCUG\\_KT.PublicBrochure.15June2017.pdf](http://www.camh.ca/en/research/news_and_publications/reports_and_books/Documents/LRCUG_KT.PublicBrochure.15June2017.pdf)
- <sup>5</sup> Cone E., Bigelow G., and Herrmann E., et al. (2011) Non Smoker exposure to Secondhand cannabis Smoke.III Oral Fluid and Blood Drug Concentrations and Corresponding Subjective Effects. *Journal of Analytical Toxicology*, 39(7), 497-509
- <sup>6</sup> Marrtens R., White P., Willams A., and Yauk C. (2013) A global toxicogenomic analysis investigating the mechanistic differences between tobacco and marijuana smoke condensates in vitro. *Toxicology*, 308, 60-73
- <sup>7</sup> The Health Technology Assessment Unit, University of Calgary, University of Calgary. (2017) *Cannabis Evidence Series: An Evidence Synthesis*. Available from <https://open.alberta.ca/dataset/cannabis-evidence-series-an-evidence-synthesis>
- <sup>8</sup> Holitzki et al. (2017). Health effects of exposure to second- and third-hand marijuana smoke: a systematic review. *CMAJ Open*, 5(4), E814-E822.
- <sup>9</sup> Barry RA, Glantz SA. A public health analysis of two proposed marijuana legalization initiatives for the 2016 California ballot: creating the new tobacco industry. San Francisco (CA): Center for Tobacco Control Research and Education, Philip R. Lee Institute for Health Policy Studies, School of Medicine, University of California, San Francisco; 2016. Available: <https://tobacco.ucsf.edu/sites/tobacco.ucsf.edu/files/u9/Public%20Health%20Analysis%20of%20Marijuana%20Initiatives%201%20Feb%202016.pdf>
- <sup>10</sup> Crippa JA, et al. "Cannabis and Anxiety: A Critical Review of the Evidence," *Human Psychopharmacology* (Oct. 2009): Vol. 24, No. 7, pp. 515–23.
- <sup>11</sup> Allen P, et al. "Modulation of Auditory and Visual Processing by Delta-9-Tetrahydrocannabinol and Cannabidiol: an fMRI Study," *Neuropsychopharmacology* (June 2011): Vol 36. No. 7, pp 1340-1348
- <sup>12</sup> Vancouver Coastal Health Authority, "220 people required medical treatment at 4 20 event Sunset beach" CBC News, April 25, 2018
- <sup>13</sup> Government of Canada. *Consumer Information - Cannabis (Marihuana, marijuana)*. Available from: <https://www.canada.ca/en/health-canada/services/drugs-medication/cannabis/licensed-producers/consumer-information-cannabis.html>
- <sup>14</sup> Webster, L., Chaiton, M. & Kirst, M. (2014). The co-use of tobacco and cannabis among adolescents over a 30-year period. *Journal of School Health*, 84(3), 151-159
- <sup>15</sup> Vancouver Parks Board, April 17, 2018 Available online <http://vancouver.ca/news-calendar/park-board-message-on-420-marijuana-event-at-sunset-beach-park.aspx>
- <sup>16</sup> The Hague, Ban on Smoking Cannabis, available online <https://www.denhaag.nl/en/general/ban-on-smoking-cannabis.htm>

