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May 30, 2016

Re: Board of Health consideration of the legalization and regulation of non-medical cannabis

Thank you for the opportunity to provide a written submission to the Toronto Board of Health regarding a public health approach to the legalization and regulation of non-medical cannabis.

The Canadian Centre on Substance Abuse (CCSA) is Canada's only agency with the legislated national mandate to reduce the **harms of alcohol and drugs on Canadians**. We provide national leadership and expert advice, advance knowledge, and prepare information and resources based on the latest evidence in order to inform policy, practice and programs that bring forward solutions. Our subject-matter expertise on cannabis is founded in the research, policy and knowledge exchange that has been our focus for many years.

CCSA recognizes the work of Toronto Public Health in recommending an evidence-based public health approach to the regulation of non-medical cannabis. We support the importance of this approach to help reduce potential harms on the population, harms which include: health and safety impacts associated with impaired driving, impacts on mental health, and impacts on adolescent brain development.

And, we continue to be committed to analyzing and sharing knowledge and research evidence on the effects of regular marijuana use. To this end, we have:

- released and regularly update our *Clearing the Smoke Series* on cannabis which provides a broad audience with information on most recent research on the health effects of cannabis.
- released a report on *The Effects of Cannabis during Adolescence*, which we note was referenced as an information source in the Toronto Public Health report.
- conducted a cross-country tour, including an event in Toronto held in February 2016, to promote dialogue on the report's findings with diverse stakeholders including youth, educators, and health professionals.

We share Toronto Public Health's concerns regarding the increased risks associated with use among youth, and has therefore conducted a series of focus groups to better understand youth perceptions of cannabis. The findings have not yet been released, but I can communicate to you in advance that they clearly indicate the need for targeted, evidence-informed prevention and education, particularly with regard to cannabis use and driving.

We are also committed to providing objective, evidence-informed policy advice. To this end, CCSA led delegations to Washington and Colorado to learn from expertise and experience with the process and early impacts of legalization. The key lessons learned through these delegations are well summarized in the Toronto Public Health report.

The message that we heard about the importance of investing proactively in education, prevention, treatment, research, monitoring, and administration bears repeating, given that building capacity in these areas will require effective partnerships between levels of government, health, social, and community partners. We welcome the call from Toronto Public Health for investments in these areas in alignment with a comprehensive public health approach.

We also share the concern expressed by Toronto Public Health for the co-location of alcohol and cannabis sales, recognizing the increased risks associated with poly-substance use, and in particular the multiplier effect on driving impairment associated with the combined use of cannabis and alcohol.

In conclusion, CCSA supports the need for strong government regulatory control on availability and accessibility, setting a minimum purchasing age, minimizing promotion, ensuring strong impaired driving policies, and restricting use in public places.

We welcome the opportunity to support the Toronto Board of Health in their dialogue on this important issue. We would be pleased to engage directly in order to discuss any aspect of our work on the issue of cannabis in greater detail, including health effects, approaches to address drug-impaired driving, and regulatory considerations. I have attached our recent publications in these areas to this submission for your reference.

Please do not hesitate to contact me with any questions.

Regards,



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