

## **Submission to the Board of Health: Legal Access to Nonmedical Cannabis**

HL20.3 (June 12, 2017)

The Centre for Addiction and Mental Health (CAMH) is pleased that the federal government's Bill C-45 emphasizes principles of public health in its approach to cannabis legalization. Among the most important aspects of a public health approach to cannabis legalization is that it not be treated like an ordinary commodity. Many important decisions, including the minimum age for legal purchase, the design of the distribution system, and the details of advertising and promotion restrictions, are still to be determined. These decisions – and their implementation – will involve different levels of government. For these reasons CAMH welcomes the Medical Officer of Health's report on legal access to non-medical cannabis. We would like to highlight five recommendations that we deem particularly important:

- that the federal government
  - require comprehensive “plain packaging” rules for all cannabis product packaging and labelling,
  - strengthen regulations on marketing and promotion of cannabis, with more comprehensive prohibitions on advertising in movies, video games and other media accessible to youth, and
  - regulate edible forms of cannabis as per the recommendations made by the federal Task Force on Cannabis Legalization and Regulation;
- that the provincial (Ontario) government
  - set the minimum age of purchase for cannabis at 19 years of age, and
  - conduct cannabis sales through a government-controlled retail and distribution monopoly that is guided by a social responsibility mandate.

These are strong, evidence-informed recommendations that CAMH has also been making to the federal and provincial governments.\* Canada needs an approach to cannabis that protects health and mitigates the risks of cannabis use, and the right set of regulations – carefully implemented and thoroughly evaluated – can help us achieve that. We hope the Board of Health will adopt the recommendations made by the Medical Officer of Health in this report.

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\* See the [CAMH Cannabis Policy Framework](#) and our [recommendations to the federal Task Force on Cannabis Legalization and Regulation](#).

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**camh** The Centre for Addiction and Mental Health (CAMH) is Canada's largest mental health and addiction teaching hospital and one of the world's leading research centres in this field. CAMH is committed to playing a leading role in transforming society's understanding of mental illness and substance use and building a better health care system. To help achieve these goals, CAMH communicates evidence-informed policy advice to stakeholders and policymakers.