

November 27, 2017

The Honourable Dr. Eric Hoskins
Minister of Health and Long-Term Care
Hepburn Block, 10th Floor
80 Grosvenor Street
Toronto, ON M7A 2C4
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Dear Minister Hoskins

Proposed Changes to the Cannabis Act (Bill C-45)

The Board of Health of the Windsor-Essex County Health Unit would like to commend the Ministry of Health and Long-Term Care, Ministry of the Attorney General's office, and the Ministry of Finance for the proposed changes to the *Cannabis Act (Bill C-45)*. The increase in minimum age of consumers, restriction of cannabis to youth under the age of 19, the government-run LCBO model for retail outlets and plans to regulate the location of cannabis retail outlets through zoning and licensing, will help to mitigate the unintended consequences of legalization to vulnerable populations.

Consuming cannabis, especially on a regular basis, is associated with many adverse health outcomes. Chronic diseases related to the carcinogens, toxins, and irritants similar to those found in tobacco smoke are also associated with cannabis use (SHAF, 2016). The effects of cannabis are particularly detrimental to adolescents and youth under the age of 25, as the developing brain is likely to be affected. In addition, individuals with mental illness are seven times more likely to use cannabis weekly, and are ten times more likely to have a cannabis use disorder (CAMH, 2013). Cannabis use can also make mental illness worse.

Another public health concern related to cannabis legalization is drug-impaired driving. The effects associated with cannabis use, such as slowed reaction time, the impacts on decision-making and divided attention, makes driving extremely dangerous after cannabis use. Cannabinoids are, in fact, among the most common psychoactive substances found in deceased and injured drivers in Canada (Wettlaufer et al., 2017).

On October 19, 2017, the Board of Health of the Windsor-Essex County Health Unit passed a Resolution with regard to the licensing, planning, and zoning regulations of cannabis retail outlets and the coordinated efforts of Windsor-Essex municipalities in preventing the harms associated with cannabis use, as outlined below:

Whereas the federal government has announced its intention to legalize recreational cannabis through the passing of the *Cannabis Act* prior to July 1st, 2018, and

Whereas cannabis smoke contains many of the same carcinogens, toxins, and irritants found in tobacco smoke with the added psychoactive properties of cannabinoids like THC, and

Whereas increased access to cannabis will result in increased risk for chronic disease, mental illness and injury, and

Whereas municipalities have control over the density and location of retail outlets through zoning, planning, and licensing regulations,

Now Therefore it be Resolved that the Windsor-Essex County Board of Health for the Windsor-Essex County Health Unit encourages all Windsor-Essex municipalities to develop strict licensing, planning, and zoning regulations related to the location and density of cannabis retail outlets, particularly in areas where vulnerable populations may be unfairly targeted.

Further that staff of the Windsor-Essex County Health Unit work with enforcement agencies and municipalities to provide a public health perspective into decision making related to the enforcement of cannabis smoking in prohibited areas, and

Further that staff of the Windsor-Essex County Health Unit utilize the Lower-risk Cannabis Use Guidelines set out by key national stakeholders, like the Centre for Addictions and Mental Health and the Canadian Public Health Association, in the development of a comprehensive public education and awareness campaign.

The Board of Health at the Windsor-Essex County Health Unit supports the efforts aimed at keeping recreational cannabis out of the hands of children and youth, as well as other vulnerable populations to which harm may result.

Determining the locations of cannabis retail outlets in Windsor-Essex based on licensing, planning, and zoning regulations through a coordinated effort of the municipalities in Windsor-Essex, will help to ensure these populations are better protected from the negative effects of cannabis use. Additionally, in order to ensure local enforcement and health promotion goals can be met, the local Board of Health requires supplementary funding which can be allocated to the training and hiring of enforcement officers, health promotion staff, and administrative supports.

[Resolution - Cannabis - October 2017 - AODA.pdf](#)

Sincerely,



Gary McNamara
Chair, Windsor-Essex County Board of Health

c: Windsor-Essex County Board of Health
Ms. Monika Turner, Director of Policy, AMO
Dr. Peter Donnelly, President and CEO, Public Health Ontario
Hon. Dipika Damerla, Associate Minister of Health and Long-Term Care
Association of Local Public Health Agencies

Local MPP's / City of Windsor – City Clerk / County of Essex – Municipal Clerks
Dr. David Mowat, Interim Chief Medical Officer of Health
Ms. Sue Makin, President, the Ontario Public Health Association
Mr. Gordon Fleming, Manager of Public Health Issues, alPHA
Ontario Boards of Health

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