



## ***Facilitating the Evolution of Cannabis in Canada*** [canevolve.ca](http://canevolve.ca)

CanEvolve is an organization dedicated to "Facilitating the Evolution of Cannabis in Canada". We have decades of prior background experience in various disciplines, including educating the public, media and politicians on the subject of cannabis. We are honoured to have this opportunity to provide feedback about the upcoming regulation of cannabis in hopes the voices of all Canadians are taken into account. We wish to focus on minimizing harms and regulations around de-normalization - two points the government included in it's objectives to minimize harms, de-normalize usage, strictly regulate, and restrict access to marijuana.

### ***Minimize Harms***

We feel it is imperative that the Task Force look at cannabis in terms of where it is in our culture today, in order to provide the right context and reality that these impending regulations must address.

The first point that must be considered, when transitioning cannabis to a regulated market, is it has never been legal in our lifetimes, but both tobacco and alcohol have. The government is not introducing a new substance into society. For over four decades, cannabis has been readily accessible to anyone who wishes to procure some, regardless of age. During this time, no one has died from using cannabis, and there have been no recorded deaths despite thousands of years of use around the world.

We agree the government should prioritize minimizing the harms from cannabis, especially for youth. This entails examining the extent of harm people actually face from ingesting cannabis. In 2002, in Canada, there were 0 deaths from cannabis, 8,103 deaths attributable to alcohol, and 39,100 attributable deaths to tobacco. The statistics show it would benefit Canadians to use any additional resources to minimize harms from these latter substances and focus on quality control issues for cannabis. Also in 2002, the Senate Special Committee On Illegal Drugs, after hearing extensive research and scientific findings, concluded persons over the age of 16 be permitted to procure cannabis and its derivatives at duly licensed distribution centres.

If more outreach emphasis is placed on moderation and education, minors will suffer less harm and consequences. In jurisdictions like the Netherlands, where cannabis use has always been "normalized" to some extent, teen use is lower than places which severely restrict its use.

The more honest we are with youth, the less attraction cannabis has for them (less cool). In response to medical cannabis, we feel it empowers youth to know that some sick people use cannabis as medicine and it helps them, no big deal. In response to non-medical use, which will be lawful soon, tell them some adults use it like coffee or alcohol to relax or at social functions (no glorification). We strongly feel this should satisfy the youth's curiosity and remove more of the mystery, instead of making it seem taboo or forbidden - things that naturally attract some teens.

See: [Marijuana may be even safer than previously thought, researchers say](https://www.washingtonpost.com/news/wonk/wp/2015/02/23/marijuana-may-be-even-safer-than-previously-thought-researchers-say/)  
<https://www.washingtonpost.com/news/wonk/wp/2015/02/23/marijuana-may-be-even-safer-than-previously-thought-researchers-say/>

See: [In 2002, the Costs of Substance Abuse in Canada study estimated that there were a total of 8,103 deaths in Canada attributable to alcohol in that year.1](http://www.ccsa.ca/Resource%20Library/CCSA-Canadian-Drug-Summary-Alcohol-2014-en.pdf)  
[http://www.ccsa.ca/Resource Library/CCSA-Canadian-Drug-Summary-Alcohol-2014-en.pdf](http://www.ccsa.ca/Resource%20Library/CCSA-Canadian-Drug-Summary-Alcohol-2014-en.pdf)  
[https://www.thestar.com/news/gta/2013/03/06/alcohol\\_one\\_of\\_canadas\\_top\\_health\\_threats\\_study.html](https://www.thestar.com/news/gta/2013/03/06/alcohol_one_of_canadas_top_health_threats_study.html)

See: [Each day, 100 Canadians die of a smoking-related illness. 39,100 attributable deaths to tobacco in 2002](http://www.hc-sc.gc.ca/hc-ps/tobac-tabac/legislation/label-etiquette/mortal-eng.php)  
<http://www.hc-sc.gc.ca/hc-ps/tobac-tabac/legislation/label-etiquette/mortal-eng.php>

See: [SENATE SPECIAL COMMITTEE ON ILLEGAL DRUGS - CANNABIS : SUMMARY REPORT- Highlights](http://cannabislink.ca/gov/senatesumm.htm)

See: [Teen Marijuana Use in the US vs. Netherlands](http://www.eastbayexpress.com/LegalizationNation/archives/2011/09/22/going-dutch-teen-marijuana-use-in-the-us-vs-netherlands-the-full-interview-with-cal-professor-robert-maccoun)

## **Regulation / Normalization**

The government states its mandate is to decrease rates of use amongst Canadian youth and deter widespread use - or "normalization" of cannabis, as was done with tobacco. The regulatory approach the government wants for cannabis would be similar to tobacco, which was considered a normal habit until the last couple of decades and has now become "de-normalized", rather than an alcohol model, or "normal behaviour". If carried out under the Tobacco Act, there would be strict no advertising or promoting and adherence to age restrictions. It would also allow cannabis to be available at retail outlets like gas stations, convenience stores, and cannabis shops and users could grow up to 15 kgs (33 lbs.) per year for personal use. Education and other social control measures, such as high taxation and restricting consumption in private/public places, has increasingly stigmatized compliant tobacco smokers. If only the most restrictive tobacco-type measures are adopted, then the cannabis regulations will fail in their objective. We agree the approach to regulate cannabis creates a unique challenge, and it has to be regulated somewhat the same, but differently, to both tobacco and alcohol.

Alcohol, because of mass marketing and social pressure, has been considered normal since prohibition ended in Canada. To this day, society, with government approval, promotes it as a socially accepted behaviour, albeit, with more restrictions now than in the 1960's-1970's. Alcohol, by all scientific findings, is the deadliest drug we use today in terms of societal cost, unintended consequences, collateral damage and a host of other problems, yet is considered "normal." It is legal to open an establishment that primarily serves alcohol, where the propensity for violence, harm, impaired driving, and personal bad choices increase.

On the contrary, coffee shop cannabis visits, by their nature, are much more peaceful and law-abiding than their alcohol user facilities. Obviously, risks and harms are not constant factors the government takes into account when deciding if public consumption areas could be permitted for food, alcohol or cannabis.

Regarding home consumption and the manufacturing of alcohol, users know they can produce large quantities of beer and wine at home for personal use, but spirits must be purchased. The majority of compliant alcohol consumers follow the rules laid out because it has always been regulated.

Despite government intentions, Canadians have been using cannabis throughout their lifetimes, and it is considered mainstream by a large, growing segment of society. The Licensed Producers market all their products as a perfectly normal way to medicate. Canadians know it has health benefits and is scientifically safer than both alcohol and tobacco. Canadian consumers will not understand the need to severely restrict usage when it has always been available on the black market, or in more recent times, from a retailer with a storefront. The compliance factor is not built into cannabis consumers the way it is with tobacco and alcohol consumers. Cannabis growers and consumers have carved their own path in an unregulated environment and shaped the current status quo on the brink of legalization. There will be resistance, defiance, and a sizeable black market until a workable compromise is established for cannabis consumers.

The new regulations for cannabis must attempt to absorb the black market by integrating the stakeholders and industry leaders from the underground market, keep the prices slightly lower, offer incentives and protection to consumers in the way of Good Manufacturing Practices (GMP), testing, labelling and other options not available from the neighbourhood dealer. Cannabis must also be as accessible as tobacco and alcohol. Cannabis lounges and cafes will further stimulate the changing economy by giving patrons a place to congregate and socialize, which they already do, and will continue to do anyway.

See: [Dutch among lowest cannabis users in Europe-report](http://www.reuters.com/article/idUSL5730185)

See: [There is no age requirement to sell tobacco products.\(Ontario\)](http://www.sfoa-training.com/the-law/age/)

See: [Sources of cigarettes for 15- to 18-year-olds](http://www.tobaccoreport.ca/2012/ytu_soc_age15_19.cfm)

See: [A legal history of smoking in Canada](#)

<http://www.cbc.ca/news/health/a-legal-history-of-smoking-in-canada-1.982213>

See: [Tobacco: Exception — manufacturing for personal use](#)

(3) An individual who is not a tobacco licensee may manufacture manufactured tobacco or cigars

(a) from packaged raw leaf tobacco or manufactured tobacco on which the duty has been paid, if the tobacco or cigars are for their personal use; or

(b) from raw leaf tobacco grown on land on which the individual resides, if

(i) the tobacco or cigars are for their personal use or that of the members of their family who reside with the individual and who are 18 years of age or older, and

(ii) the quantity of tobacco or cigars manufactured in any year does not exceed 15 kg for the individual and each member of the individual's family who resides with the individual and who is 18 years of age or older.

2002, c. 22, s. 25; 2007, c. 18, s. 74.

<http://laws-lois.justice.gc.ca/eng/acts/E-14.1/page-4.html#h-15>

See: [The Chief Public Health Officer's Report on the State of Public Health in Canada, 2015: Alcohol Consumption in Canada](#)

<http://healthy Canadians.gc.ca/publications/department-ministere/state-public-health-alcohol-2015-etat-sante-publique-alcool/index-eng.php>

See: [Car camping cocktails](#)

<http://calgaryherald.com/life/food/recipes/car-camping-cocktails-spruce-up-your-next-fireside-bevy>

See: [History of Tobacco Control in Canada](#)

[http://www.smoke-free.ca/pdf\\_1/2009/history%20of%20tobacco%20control%20in%20canada.pdf](http://www.smoke-free.ca/pdf_1/2009/history%20of%20tobacco%20control%20in%20canada.pdf)

## **Medical**

Provisions for medical patients must be maintained in order to comply with the Charter. There can be no age restrictions on medical cannabis. Like all approved medicine, it must be safe, accessible and affordable. Patients who need to medicate in private or public places, or at work, must be accommodated to a degree that human rights are not called into question, but bound by laws when in a safety sensitive position. The current ACMPR program could be expanded to include greater access through dispensaries and other designated outlets..

The need for dispensaries should not be underestimated. These pioneers have been around for almost two decades and have offered a solution to medical access where none existed before. People trust them, most likely because of the singularity of focus, and the risks they endure on clients behalf, unlike if it were sold in liquor stores, pharmacies, or other multi-purpose outlets. Without a provision for dispensaries, the illegal ones will likely continue to operate, and the pressure from the public could prove undaunting.

## **Business**

Business is leading the way in the new cannabis economy because investors see the opportunities for growth in creating a new part of the economy at a time when many old investments are failing or becoming redundant. The Licensed Producers have invested in opening access for patients to the MMPR/ACMPR program which has significantly increased the number of medical cannabis patients since it's inception in 2013. As a result, interest and investment in a post-legalization Canada, is very promising. There are now Expos and trade fairs in major cities and and business is creating a "new normal" to compliment the rallies, events and gatherings cannabis enthusiasts have held illegally for decades. The government's objectives to de-normalize usage, possibly disseminate incorrect information, strictly regulate and restrict access to cannabis, must be reconsidered. The Canadian government needs to see the revenue ramifications and help usher in the full potential of the business community who are ready to serve cannabis consumers in a safe, regulated market.

See: [Marijuana industry could create 'thousands of jobs' in New Brunswick](#)

<http://www.cbc.ca/news/canada/new-brunswick/holt-marijuana-economy-jobs-1.3733733>

See: [Cannabis Industry Unexpected Boost For Alberta's Struggling Economy](#)

[http://www.huffingtonpost.ca/marc-davis-/alberta-cannabis\\_b\\_10046344.html](http://www.huffingtonpost.ca/marc-davis-/alberta-cannabis_b_10046344.html)

See: [Jason Zandberg, special situations analyst with PI Financial has initiated coverage on four marijuana companies that have won licenses from Health Canada.](http://www.theglobeandmail.com/report-on-business/video/video-its-just-a-weed-why-low-cost-marijuana-firms-look-like-winners/article31255350/)  
<http://www.theglobeandmail.com/report-on-business/video/video-its-just-a-weed-why-low-cost-marijuana-firms-look-like-winners/article31255350/>

## **RECOMMENDATIONS**

To offer the briefest synopsis of this submission, please consider the following recommendations in order to eliminate the black market upon legalization;

- Allow provincial governments to set the same age limits (or lower) as tobacco and alcohol
- Cannabis production must adhere to GMP's, be tested and labelled for public consumption
- Allow cannabis to be produced by large producers, medium sized growers and craft growers
- Allow a minimum of 15 plants to be grown at home for personal use
- Allow cannabis cafes, dispensaries and lounges to open which obey federal, provincial and municipal laws for similar establishments.

## **ADDENDUM**

This current situation in a small Saskatchewan town encapsulates the cannabis "situation" that could be scaled to a national level.

A local man in a town of 1,100 people converted his hemp store into a medical cannabis dispensary. He runs it as a non-profit and donated approximately \$90,000 to the community. Some people support, some oppose. He has 400 members, mostly from the town and surrounding area.

The salient points are:

- approximately 35% of population are using cannabis in a small town on the Prairies, maybe more if others have their own supply and aren't counted. Whitewood, Saskatchewan is far away from the culture and tolerant provinces like BC, Ontario and Quebec. It is possibly a more accurate barometer of the percentage of the general population who use cannabis occasionally or regularly. The usually (self) reported numbers of around 12.2% don't hold much credence when many people refuse to incriminate themselves when asked if they use cannabis, so they lie.
- He has not been raided or shut down and RCMP police and council seem neutral. There seems to be tolerance of cannabis everywhere.

See: [Pot dispensary owner donates \\$90,000 but divides Whitewood, Sask.](http://www.cbc.ca/news/canada/saskatchewan/marijuana-dispensary-whitewood-saskatchewan-1.3306264)

<http://www.cbc.ca/news/canada/saskatchewan/marijuana-dispensary-whitewood-saskatchewan-1.3306264> 2012

See: [Canadian Community Health Survey-Mental Health \(CCHS-MH\)](#)

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