

Speaking Notes for Rebecca Jesseman

Canadian Centre on Substance Use and Addiction

Senate Standing Committee on Legal and Constitutional Affairs, Study of Bill C-45, Canadian Cannabis Act

Ottawa, Ontario, March 28, 2018

Introduction

Good afternoon Mr. Chair and members of the Committee. My name is Rebecca Jesseman and I am the Director of Policy at the Canadian Centre on Substance Use and Addiction or CCSA, Canada's only agency with a legislated national mandate to reduce the harms of alcohol and other drugs on Canadian society.

We welcome the opportunity to speak to you today about Bill C-45. CCSA has demonstrated our subject-matter expertise on cannabis through our research publications and our work with national and international partners on the health and social impacts of cannabis use, drug-impaired driving, and regulatory options.

I will keep my comments brief to respect the time constraints and have provided the committee clerk with links to additional resources.

Objectives

The objectives of any legislation should drive the way in which it is constructed and how its success is measured and evaluated. The objectives of Bill C-45 are to prevent youth from accessing cannabis, to protect public health and safety through product safety and quality requirements, to deter criminal activity, and to reduce the burden on the criminal justice system.

A Public Health Approach

CCSA looks at cannabis regulation from a public health perspective, which seeks to minimize harms, maximize benefits, apply evidence and promote equity. These goals can be achieved by increasing product safety and quality, by decreasing rates of use overall and rates of high-risk use in particular, and by monitoring and evaluating regulatory impact.

Evidence indicates that those who begin using cannabis early and use it frequently or in high doses are at greatest risk for health-related harms such as dependence, cognitive impairment and psychosis. High-risk use also includes use before driving or in the workplace, and use in combination with other substances, as well as use by pregnant women and those predisposed to psychosis.



Reducing Harms and Achieving Objectives

Regulating cannabis requires a combination of both restrictions and incentives. Minimum legal age is one component of a comprehensive approach to reducing youth cannabis use. A federal minimum age of 18 allows the provinces and territories to establish a higher minimum age, and provides the opportunity for administrative rather than criminal sanctions for underage use, thereby satisfying the objective of reduced criminal justice involvement.

Evidence from the regulation of alcohol and tobacco highlights the importance of restrictions on marketing and promotion, such as those included in Bill C-45, to avoid increases in use.

However, we know that restrictions and other forms of deterrence are not the best or only approach. Successful deterrence rests on a number of factors such as perceived risk and profit, personal risk tolerance, previous criminal justice experience, and understanding, consistency and timeliness of sanctions. Relying on criminal justice deterrents also risks compromising the government objective of reduced burden on the criminal justice system and the public health objective of ensuring equity.

Incentivizing lower-risk use of cannabis includes promoting abstinence and delayed or reduced levels of use, promoting the use of products lower in THC content, and promoting the avoidance of use with other psychoactive substances, including alcohol. Effective strategies to support lower-risk use include a comprehensive, evidence-informed approach to prevention and public education, minimum unit pricing, and volumetric pricing based on THC concentration. Quality control and product safety also provide incentives for consumers to purchase from the legal rather than illicit market. Federal, provincial and territorial regulations will address these details and complement the framework established by Bill C-45.

Recommendations

I would like to close by highlighting four key recommendations to support successful implementation of cannabis regulation:

- Provide proactive and sustained investment in prevention and education efforts, treatment services, research, enforcement and administration;
- Develop a comprehensive approach to regulation through effective coordination, communication and funding among all levels of government;
- Take a precautionary approach in recognition that increasing restrictions is more difficult than loosening them following implementation; and
- Expect the unexpected, measure and evaluate impacts, and ensure that the regulatory framework has the flexibility to adapt quickly if required.

Thank you. I will be happy to respond to your questions.



Additional Resources

Canadian Centre on Substance Abuse. (2015). *Cannabis regulation: lessons learned in Colorado and Washington State*. Ottawa, Ont.: Author. Available at <http://www.ccsa.ca/Resource%20Library/CCSA-Cannabis-Regulation-Lessons-Learned-Report-2015-en.pdf>

Canadian Centre on Substance Abuse. (2016). *Clearing the smoke on cannabis: highlights – an Update*. Ottawa, Ont.: Author. Available at <http://www.ccdus.ca/Resource%20Library/CCSA-Clearing-the-Smoke-on-Cannabis-Highlights-2016-en.pdf>

Canadian Centre on Substance Use and Addiction. (2017). *Brief to the House Standing Committee on Health Regarding Bill C-45*. Available at <http://www.ourcommons.ca/Content/Committee/421/HESA/Brief/BR9092889/br-external/CanadianCentreOnSubstanceUseAndAddiction-e.pdf>

George, T., & Vaccarino, F. (Eds.). (2015). *Substance abuse in Canada: the effects of cannabis use during adolescence*. Ottawa, Ont.: Canadian Centre on Substance Abuse. Available at <http://www.ccdus.ca/Resource%20Library/CCSA-Effects-of-Cannabis-Use-during-Adolescence-Report-2015-en.pdf>

National Alcohol Strategy Advisory Committee. (2015). *Social reference prices for alcohol: a tool for Canadian governments to promote a culture of moderation*. Ottawa, Ont.: Canadian Centre on Substance Abuse. Available at www.ccsa.ca/Resource%20Library/CCSA-Social-Reference-Prices-for-Alcohol-Canada-Report-2015-en.pdf

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