

**From:** Cheryl Case <[cherylcase2devine@gmail.com](mailto:cherylcase2devine@gmail.com)>

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**To:** <[jennifer franki-smith@gov.nt.ca](mailto:jennifer franki-smith@gov.nt.ca)>, <[michael\\_ball@gov.nt.ca](mailto:michael_ball@gov.nt.ca)>

**Subject:** Bill - 6.0 Cannabis Regulations

On behalf of the Northwest Territories and Nunavut Public Health Association, a branch of the Canadian Public Health Association, I would would like to make the following comments regarding the above-mentioned Bill.

Our theme is a harm reduction approach:

1. Second hand smoke is a health concern for our vulnerable young population, our children and unborn fetus. Our children do not have control or a choice to be present/absent in shared space with those consuming cannabis in the smoked form. Although the proposed Bill addresses this in *Part 3, Section 9 of the Cannabis Products Act*, amendments to the *Motor Vehicle Act*, to include "drug related offence" of any form of cannabis consumption, in any form, in a vehicle. Section 36 of the *Cannabis Products Act*, states that "No minor shall consume cannabis except for medical purposes", and *Subsection (1) Cannabis Smoking Act* states that cannabis cannot be consumed in public locations where children may be in the area. Although impossible to address cannabis smoking in home dwellings, I would like to state that in the north, this vulnerable population does spend a great deal of time in their home dwelling and our NWT Bureau of Statistics state 7% of house dwellings have 6 or more residents and 19% of the housing has core need deficits, both being used as indicators for crowded housing.

Proposed Amendment: Our Bill could include allowance for the use of specified dwellings in communities where it would be a safe place for those 19 years and older to consume cannabis in smoking and other forms.

2. Establish tax rates for cannabis containing products based on the concentration of tetrahydrocannabinol (THC), similarly to the alcohol rating process based on alcohol content. For example, higher tax rates for products with higher THC concentration.

Proposed Consideration: Our government develop a formulation that will secure funds to address the public health need that I have raised about second hand smoke. Our best defense is education, by promoting the health benefits of smoke free homes and offering alternatives such as safe smoking locations (inside and outside). A health promotion campaign would be directed to the young and old and would be presented in the media forms that would be appealing to our targeted populations over the upcoming years. This requires resources but can be accomplished. A couple of examples are our NWT "Butt Head" Don't and Stop smoking campaigns that have been running for decades and our seat belt campaign through health promotion, research and legislation. Directed Cannabis "sin tax" would offer the same positive public health outcomes. Health promotion principles are outline by "Here to Help- Mental Health and Substance Use Information you can Trust".

3. Lastly, I would like to caution you that there is much that we do not know about cannabis and the affects that it will have on our population. Research of the health effects of cannabis have been stalled at universities since cannabis has been an illegal drug, making research approval

very difficult to obtain (Owens, 2018 and Ross, 2017). We will begin to learn a lot more about cannabis' health effects in the next decade.

Proposed Amendment: Practice with a restricted opinion in our Bill and lesson the restrictions as evidence presents.

**References:**

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Ross, D.A. **Second-hand Exposure to Marijuana by Emergency Responders.** April, 2017. Special District Association of Colorado. Accessed online May 3, 2018 at: <https://www.sdaco.org/news/second-hand-exposure-marijuana-emergency-responders>

Respectfully submitted by Cheryl Case, President of Northwest Territories and Nunavut Public Health Association