

Public Health
277 Victoria Street
5th Floor
Toronto, Ontario M5B 1W2

Tel: 416-338-7820
Fax: 416-392-0713
eileen.devilla@toronto.ca
toronto.ca/health/professionals

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Standing Senate Committee on Social Affairs, Science and Technology
Senate of Canada
Ottawa ON K1A 0A6
E-mail: soci@sen.parl.gc.ca

Dear Standing Committee Chair and Members:

Re: Bill C-45, An Act Respecting Cannabis and to Amend the Controlled Drugs and Substances Act, the Criminal Code and other Acts

I am writing in my role as Medical Officer of Health, and on behalf of Toronto Public Health (TPH), which is Canada's largest public health agency serving 2.8 million people in the city of Toronto. Our mission is to reduce health inequities and improve the health of the whole population.

Toronto Public Health supports an evidence-based public health approach to developing a regulatory framework for non-medical cannabis with a goal of reducing potential harms for the population as a whole. To that end, we urge you to consider the key recommendations below:

- Require comprehensive “plain packaging” rules for all cannabis product packaging and labelling as are currently being proposed in federal Bill S-5 - An Act to amend the *Tobacco Act* and the *Non-smokers' Health Act* and as per recommendations by the federal Task Force on Cannabis Legalization and Regulation;
- Strengthen regulations on marketing and promotion of cannabis with more comprehensive prohibitions that address advertising in movies, video games and other media accessible to youth;
- Regulate edible forms of cannabis as per the recommendations made by the federal Task Force on Cannabis Legalization and Regulation;
- Establish measures for cannabis law enforcement such as equity training, to ensure fair treatment of population groups disproportionately represented in the criminal justice system; and
- Earmark funding for research related to the full range of potential health impacts of non-medical cannabis use, including for occasional and moderate consumption; and for targeted education about substance use, with a focus on fair and equitable treatment of all people for individuals working in the public service sector, including, education, healthcare, social services, law enforcement and criminal justice.

Detailed comments on the issues identified above are found in the attached Brief (Attachment 1) for your consideration. Further, I hope you will consider the motions related to this topic that were adopted by the City of Toronto's Board of Health at its June 12, 2017 meeting, which were sent to the Government of Canada and the Cannabis Legalization and Regulation Secretariat. This report is also available online at:
<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.HL20.3>.

I appreciate the complexity of building a regulatory framework for non-medical cannabis. Effective regulation must be guided by public health principles to balance legal access to cannabis while also reducing the potential harms of use. The science on the health impacts of cannabis use is still emerging, and investments are needed to expand this evidence base going forward to ensure the regulatory framework is protecting the health and safety of the population. I look forward to ongoing consultations with the Government of Canada on the evolving policy landscape for this important public health issue.

Yours truly,



Eileen de Villa, MD, MBA, MHSc, CCFP, FRCPC
Medical Officer of Health

Attachment 1: Toronto Public Health Brief on Bill C-45 and Regulation of Cannabis for Non-medical Use