

Public Health Considerations regarding opting in/out of cannabis retail outlets

Municipalities have a one-time opportunity to opt out of cannabis retail in their communities by January 22, 2019. This opt out can be reversed at a later date but any decision to opt in is final. The *Cannabis Statute Law Amendment Act* sets out the legal structure for private cannabis retail in Ontario and gives the Alcohol and Gaming Commission of Ontario (AGCO) the authority to license, regulate and enforce the sale of recreational cannabis through privately run stores in Ontario¹.

Evidence from both tobacco and alcohol research show that the retail environment has an effect on substance use and related harms. Greater access, including high density and extended hours of sale, can contribute to an increase in substance use and related harms^{2,3,4,5}. Provincial legislation and regulations have announced that there will be no caps on the number of cannabis retail storefronts, leaving it to market demand to decide locations and the number of stores. Furthermore, cannabis retail stores will be authorized to operate during the hours of 9:00 a.m. and 11:00 p.m.

Greater access can also normalize the behaviour, hinder an individual's ability to limit or quit their consumption of a particular substance and undermine health warnings^{6,7}. While there is less evidence for cannabis, it is reasonable to assume that the same precautionary approach should apply. Attention needs to be given to vulnerable populations, such as youth and those with co-addictions. While the Ontario Regulation 468/18 includes a 150 metre exclusion criteria from schools, other sensitive areas are not considered, including areas where youth frequent, such as youth recreational facilities as well as hospitals and other substance retailers.

1 Association of Municipalities of Ontario. Briefing: municipal governments in the Ontario recreational cannabis framework. 2018. Retrieved from: <https://www.amo.on.ca/AMO-PDFs/Reports/2018/Briefing-Municipal-Governments-in-the-Ontario-Recr.aspx>

2 Popova S, Giesbrecht N, Bekmuradov D, Patra J. (2009). Hours and days of sale and density of alcohol outlets: impacts on alcohol consumption and damage: a systematic review. *Alcohol* Oct;44(5):500-16.

3 World Health Organization (2010). Global strategy to reduce the harmful use of alcohol. Available from: http://www.who.int/substance_abuse/msbalcstragegy.pdf

4 Borodovsky JT, Lee DC, Crosier BS et al. (2017). US cannabis legalization and use of vaping and edible products among youth. *Drug Alcohol Depend* 177:299-306. Available from: <https://www.ncbi.nlm.nih.gov/pubmed/28662974>

5 Mair C, Freisthler B, Ponicki WR, Gaidus A. NIHMS705271; The impacts of marijuana dispensary density and neighborhood ecology on marijuana abuse and dependence (2015). *Drug Alcohol Depend* 154:111-6. Available from: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4536157>

6 Smoke-Free Ontario Scientific Advisory Committee, Ontario Agency for Health Protection and Promotion (Public Health Ontario). Evidence to guide action: Comprehensive tobacco control in Ontario (2016). Toronto, ON: Queen's Printer for Ontario; 2017. Retrieved from: https://www.publichealthontario.ca/en/eRepository/SFOSAC%202016_FullReport.pdf

7 Babor, T, Caetano R, Cassell S, Edwards G, Giesbrecht N, Graham K,...Rossow I. (2010). *Alcohol no ordinary commodity: Research and public policy* (Second ed.). New York, USA: Oxford University Press.

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Alternatively, opting out of private cannabis retail stores completely may create a health inequity for vulnerable populations (e.g. individuals without a fixed address, a credit card or access to transportation) as well as drive individuals to the illicit market. In order to prevent individuals from accessing cannabis from the illicit market the legal market needs to be competitive with the existing illicit market. The legal market should provide safe and reasonable access, competitive prices and variety of product choices. Excessive restrictions may lead individuals to purchase unregulated cannabis products from the illicit market, which carries its own set of risks, including products with an unknown potency, products that have been laced with other substances or which have mould.

While cannabis retail stores can provide economic benefits to the municipality, it is important to also consider the costs of substance use. The overall economic costs of substance use in Canada in 2014 was estimated to be \$38.4 billion. The legally available and most widely used substances, alcohol and tobacco, contributed to almost 70% of these costs⁸.

⁸ Canadian Substance Use Costs and Harms Scientific Working Group. (2018). *Canadian substance use costs and harms (2007-2014)*. (Prepared by the Canadian Institute for Substance use Research and the Canadian Centre on Substance Use and Addiction.) Ottawa, Ont.: Canadian Centre on Substance Use and Addiction. Retrieved from: <http://www.ccdus.ca/Resource%20Library/CSUCH-Canadian-Substance-Use-Costs-Harms-Provincial-Territorial-Report-2018-en.pdf>