

REGULATORY REGISTRY FEEDBACK FORM

Potential for Cannabis Consumption Establishments and/or Cannabis Special Occasion Permits

On December 12, 2019, the government announced that it is taking steps to move to an open market for retail cannabis sales in Ontario, as it originally intended. This will provide consumers with more choice and convenience and a safe and reliable supply of cannabis. For more information, please visit <https://news.ontario.ca/mag/en/2019/12/ontario-opening-cannabis-retail-market.html>.

As part of Ontario's transition to an open market, the government would like your feedback on the potential implementation of additional cannabis business opportunities in the future, including:

1. facilitating the sale of cannabis for consumption in establishments like lounges and cafes (cannabis consumption establishments); and,
2. cannabis special occasion permits (SOPs).

The government is collecting feedback at this time to inform potential decisions about opportunities in an open cannabis market in the future. No changes to the cannabis framework are expected at this time nor is there a current timeframe for any additional changes that may be informed by this feedback.

Cannabis Consumption Establishments and Special Occasion Permits

Cannabis consumption establishments and SOPs, if brought forward, could facilitate the purchase and consumption of cannabis in specified social settings (e.g. cafés, entertainment venues, festivals and events).

Cannabis Consumption Rules

Cannabis can be smoked or vaped in many outdoor public places and in private residences.

The *Smoke-Free Ontario Act, 2017* (SFOA, 2017) and the regulations under that Act prohibit the smoking of cannabis and the use of electronic cigarettes (e-cigarettes) to vape any substance (including cannabis) in enclosed workplaces and enclosed public places, as well as other prescribed places (e.g., restaurant and bar patios or within nine metres of these patios).

The SFOA, 2017 also prohibits drivers and passengers from consuming any form of cannabis (smoking, vaping, eating) in vehicles and boats that are being driven or will be driven, subject to certain exceptions.

The SFOA, 2017 is not the only source of smoking and vaping restrictions in Ontario. Additional restrictions on cannabis consumption may be found in municipal bylaws and the policies of employers and property owners.

The government is not considering changes to the SFOA, 2017 regime as part of this consultation.

For more information on Ontario's cannabis consumption rules, please visit www.ontario.ca/cannabis.

Other Forms of Cannabis Products

On June 26, 2019, Health Canada published regulations for the production and sale of three new classes of cannabis products:

- *cannabis edibles* – cannabis products that can be consumed in the same manner as food (e.g. food or beverage)
- *cannabis extracts* – cannabis products that are produced using extraction processing methods or by synthesizing phytocannabinoids (e.g., oils, capsules, hash, wax)
- *cannabis topicals* – cannabis products that can be used on a body surface (e.g. lotion)

These new federal regulations came into force on October 17, 2019 and the new classes of cannabis products became available for sale in Ontario on January 6, 2020.

For more information on Health Canada's rules for edibles, extracts and topicals, please visit: <https://www.canada.ca/en/health-canada/news/2019/06/health-canada-finalizes-regulations-for-the-production-and-sale-of-edible-cannabis-cannabis-extracts-and-cannabis-topicals.html>

Other Jurisdictions

At this time, no other Canadian jurisdiction has implemented a framework for cannabis consumption establishments, like lounges or cafes, or SOPs.

Some jurisdictions in the United States that have legalized recreational cannabis have allowed regulated cannabis consumption establishments and SOPs where individuals are permitted to consume recreational cannabis. However, it should be noted that in those states, the consumption of recreational cannabis is restricted to private residences only (i.e. cannabis consumption is not permitted in any public place). In these jurisdictions, cannabis consumption establishments/SOPs might assist in mitigating certain equity issues in a more restrictive consumption rules framework (e.g. tourism, individuals who are not permitted to consume cannabis in their private residence per condominium/building policies).

Instructions

Please provide your feedback to the questions below on this form and submit to cannabis@ontario.ca.

The closing date for providing feedback is March 10, 2020.

Contact Information

Please provide your name, title and the full name and address of your organization (if you are submitting comments on behalf of an organization).

The responses below are the recommendations of the City of Ottawa's Medical Officer of Health, Dr. Vera Etches. The recommendations are derived from staff's professional review and analysis of the available evidence on cannabis as well as lessons learned from the regulation of other substances.

The recommendations have been circulated to Members of the Board of Health for the City of Ottawa Health unit, however they have not been formally considered or approved by same, nor has the Board had an opportunity to receive public delegations on same. The recommendations described below will be presented to the Board at its meeting on April 20, 2020, after which the Board Chair will forward any additional recommendations and comments that may arise from the Board meeting.

The Medical Officer of Health's contact information is as follows:

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About You or Your Organization

(please check the appropriate box/boxes)

☒ **Health organization**

☐ Educator

☐ Law enforcement

☐ Municipality

☐ Indigenous
organization/community

☐ Other _____

Region

(please refer to map and check appropriate box)

☐ 1. Central Ontario

☒ **2. Eastern Ontario**

☐ 3. Greater Toronto Area

☐ 4. Northern Ontario

☐ 5. Southeastern Ontario

☐ 6. Southwestern Ontario

☐ 7. Western Ontario

☐ 8. Provincial



Cannabis Consumption Establishments/Special Occasion Permits

1. Taking into consideration the places of use rules for cannabis under the SFOA, 2017 (as outlined on page 1), should the government consider facilitating the sale of cannabis for consumption in establishments like lounges and cafes in Ontario? Why or why not?

As the medical officer of health for the City of Ottawa, I recommend that the Government of Ontario not consider facilitating the sale of cannabis for consumption in establishments at this time.

There are public health concerns with increasing access and normalization of cannabis consumption. Research related to alcohol and tobacco policies has shown that increased access to these substances leads to an increased prevalence of use and the harms associated with the use of these substances.^{1,2} Regular use of cannabis, especially at a young age, can lead to health and social harms, including changes to brain development in youth, poor lung health when smoked or vaped, mental health illnesses and challenges, physical and psychological dependence leading to cannabis use disorders.³ In addition, there are immediate risks with allowing the public consumption of cannabis because of its intoxicating effects and the resulting harms and impacts to the community.

I commend the Government of Ontario for maintaining the *Smoke Free Ontario Act, 2017* (SFOA, 2017), which protects people from exposure to second-hand smoke and vapour in public places. I recommend the Government of Ontario maintain existing SFOA, 2017 restrictions as it considers cannabis establishments, now and in the future, based on the known health risks of second-hand smoke exposure and emerging evidence on the impacts of vaping, especially to youth and young adults.^{4,5,6}

The Government should also take into consideration any local restrictions on smoking, vaping and the use of waterpipes that have already been enacted by municipal councils for purposes of public health and safety, protection of persons, and nuisance control. For example, in 2019 the City of Ottawa harmonized its smoke-free by-laws to consistently prohibit smoking and vaping of tobacco, cannabis and any other substance, as well as the use of waterpipes in enclosed public places, enclosed workplaces, and City parks, beaches and outdoor areas of City facilities. As a result, any facilitation of cannabis consumption by the Government should not infringe upon local municipal rules regarding smoking, vaping and waterpipe use.

The Board of Health for the City of Ottawa Health Unit has previously recommended that the Government ban the public consumption of all forms of cannabis in the same manner it prohibits the public consumption of alcohol. While smoking and vaping is restricted in public places and workplaces under the SFOA, 2017, there are currently no restrictions to where ingestible or edible cannabis can be consumed in public, other than in a vehicle or boat. The risks associated with ingestible and edible cannabis, as described below, warrant provisions to restrict the public consumption of these products.

Cannabis contains tetrahydrocannabinol (THC), which is a psychoactive chemical that can impair a person's attention, judgement and coordination in much the same way as alcohol. The intoxicating effects of cannabis, when ingested, are delayed and prolonged. The onset of effects can be delayed from 30 minutes to 2 hours or more, peak at 4 hours, and last up to 12 hours or longer. The health risks associated with ingesting cannabis pose a challenge to serving these products in public, in a socially responsible manner, and consideration must be given to mitigate the risks to health and safety.

I recommend the Government of Ontario consider the following before moving forward with cannabis consumption establishments:

1) Ingestible and edible cannabis have delayed and prolonged intoxicating effects ^{7,8,9}

The delayed effects limit the ability to monitor and control for intoxication, which can cause consumers to ingest additional servings of cannabis, resulting in an unexpected, cumulative effect. The delayed onset and prolonged duration of effects can increase the risk of impaired driving. As demonstrated in case law pertaining to the service of alcohol, this can result in a longer duration for which the establishment and/or service clerk would be held accountable and responsible for actions taken by the consumer that resulted in injury or harm.

2) There is a lack of research about the intoxicating effects of cannabis

Research is needed to know how cannabis products can be served and consumed in a socially and responsible manner in public. The responsible service of alcohol is possible because of the gradual, accumulative effect when alcohol is consumed slowly, and intoxication can be predicted based on a standard unit of alcohol. The same type of research is needed for cannabis. There is no standard dose of THC and CBD (cannabidiol) per serving size of

cannabis that results in a predictable level of intoxication. What is known about cannabis intoxication is that it depends on several factors, including:

- How cannabis is consumed (smoked/vaped/eaten);
- The concentration of the THC and CBD in the product;
- The timeframe during which cannabis is consumed; and
- Individual biological factors of the consumer.

3) Inability to control for the public co-consumption of alcohol and cannabis.

As alcohol is widely available in communities for consumption in public establishments, it would be very difficult to implement effective controls, policies or enforcement that would prevent or prohibit the public co-consumption of alcohol and cannabis. Simultaneous alcohol and cannabis use have shown to have harmful effects on cognitive and psychomotor performance, impair driving performance, and significantly increase the risks of collision.

4) More time is needed to monitor the outcomes associated with the legalization of cannabis

The Government of Ontario should take a precautionary approach by monitoring for the outcomes of legalization and emerging evidence on cannabis. As well, the Government should apply lessons learned from the regulation of tobacco and alcohol to minimize the impact that normalization and increased access can have on our communities. Evidence from alcohol research demonstrates that a sales-driven or privatized system results in greater access, higher density of outlets, extended hours of sale, reduced attention to preventing service to minors or intoxicated patrons, and increased promotion or advertising, all of which can encourage an increase in alcohol use and alcohol-related harms.¹⁰

Understanding the impacts of legalization in Ontario will happen over time. The potential unintended consequences are not yet known as cannabis has only been permitted for sale and consumption in Canada since October 17, 2018. Further, new cannabis products, such as edibles and beverages, have only been permitted in Ontario as of January 2020. A public health approach to regulating cannabis is needed to minimize the potential health and social harms. A public health approach requires a long-term commitment to evidence-informed decisions about regulations that prioritizes protecting the public's health and safety. This should include investments in health assessment, surveillance, research, health promotion/protection activities and support for early identification and treatment.

2. If cannabis consumption establishments were considered in Ontario, what other products should be permitted for sale in those establishments (e.g. cannabis accessories, food/beverage products that do not contain cannabis)?

Health Canada established regulations for cannabis production to prohibit the consumption of cannabis with other products, including alcohol, tobacco and caffeine and prevent the cross contamination of cannabis products with non-cannabis products during production by requiring that such products be produced at separate facilities. These regulations should be considered by the Government of Ontario if cannabis consumption establishments be permitted.

It is recommended that consumers not co-use cannabis with other harmful and/or intoxicating substances, such as alcohol, because the potential for synergistic and additive effects of substance use is highest when substances are consumed simultaneously.^{11,12,13,14,15,16,17,18,19} Simultaneous use of alcohol and cannabis is already prevalent in Canada, especially among youth, and is associated with more harmful consequences than using either substance alone.^{20,21,22,23,24,25}

As stated in the response to question 1, simultaneous alcohol and cannabis use has shown to have harmful effects on cognitive and psychomotor performance²⁶, impair driving performance^{27,28} and significantly increase the risks of collision and odds of impaired driving.²⁹ Alcohol and cannabis use can also cause abnormal changes to brain function and structures when used for a prolonged period. These effects are more prominent with co-use than when each substance is used separately.³⁰ Additionally, individuals who engage in simultaneous use of alcohol and cannabis may experience increased levels of THC.

Unlike with alcohol, there is no evidence to suggest that serving cannabis products alongside non-cannabis food or beverages has a positive impact to diminish the intoxicating effects, such as delayed absorption of THC or reduced level of intoxication.

3. In Ontario, the Alcohol and Gaming Commission of Ontario (AGCO) oversees the administration of an alcohol SOP program, which allows for the sale and service of alcohol at special occasions, including large scale events that are open to the public, such as festivals.

Should the government consider establishing a similar SOP program for cannabis to be sold and consumed at festivals and events? Why or why not?

If yes, what conditions should be included (e.g. should alcohol consumption at the same event be restricted, should the event be age-restricted to 19+, what methods of cannabis consumption should be permitted)?

For more information on the current alcohol SOP program, please visit:
<https://www.agco.ca/alcohol/special-occasion-permits-private-event>

As demonstrated in the response to question 1, there are health risks associated with ingesting cannabis in public places, including events, which pose a challenge to serving these products in a socially responsible manner. Controlling access and consumption of cannabis can protect the health and safety of the public and manage risk and liability for the event operators and property owners as well as for municipalities.

Permitting cannabis consumption in public areas may further normalise use and hinder the public's enjoyment of these areas, particularly in family- or child-oriented areas and natural spaces such as conservation areas. The designation of public areas for the consumption of cannabis through SOPs may increase the risk of injury and harm.

Further to the considerations outlined in the response to question 1, the Government of Ontario should also consider how to establish controls to reduce underage consumption and the consequences with normalization of public cannabis consumption. The Government should also consider the safety risks in permitting cannabis consumption at events. At this time, with alcohol sale and consumption permitted, events are faced with a safety and security environment that is evolving, and mitigation measures are already seen as challenging and costly.

4. Are there any additional risks / opportunities created by cannabis consumption establishments or SOPs when compared to authorized cannabis retail stores?

Cannabis is a drug that can cause negative health and social impacts. In addition to the immediate, short term risks that have been outlined in the responses to questions 1 and 3, there are also long-term consequences with regular, prolonged use of cannabis. These risks include poor lung health when smoked or vaped, risks for physical dependence or developing a substance use disorder or other mental health challenges, increased risks for vulnerable populations such as youth, pregnant or chest feeding persons and older adults.³¹

The governmental objectives in legalizing and regulating cannabis have been to protect youth, provide restricted access to a regulated product, reduce the burden on the

criminal justice system and enhance public awareness of the health risks associated with cannabis use. A public health approach to the regulation of cannabis is needed to minimize the risks. The Government of Ontario should consider the health evidence presented throughout this response when making changes that would increase access and normalize public consumption.

5. What should be a municipality's involvement, if any, in a potential framework for cannabis consumption establishments or SOPs?

Due to the evidence outlined above and the potential impacts on communities, it is recommended that the Government of Ontario consult municipalities prior to and throughout the process of establishing a framework for cannabis consumption establishments or a cannabis SOP. Public health units, associations or groups must also be included to ensure a public health approach to cannabis regulation.

Should the creation of cannabis consumption lounges, cafes or other establishments be facilitated or specifically authorized by the government, consideration should be given to the municipal role in regulating such establishments. Municipal law enforcement officers (by-law officers) will not be able to enforce any provincial or federal rules regarding the manufacturing, preparation, serving, sale or consumption of cannabis edible products, oils or tinctures in a lounge or café setting. Municipal law enforcement officers will not be able to distinguish between products containing cannabis and those that don't, nor will they be able to determine composition, limits, or quality of these products.

In addition, the regulation of location and number of any cannabis lounges, cafes or other establishments authorized by the Government should be considered. The municipal business licensing function, under Part IV of the *Municipal Act*, 2001, does not allow a municipality to refuse to issue business licenses based on the location of the establishments (with the exception of adult entertainment parlours and payday loan establishments) nor does it allow the municipality to restrict the number of licenses issued to a particular class of business (with the exception of taxicabs and payday loan establishments).

The Government should therefore consider the potential land use impacts and community consequences of authorizing cannabis consumption lounges and set out clear rules for their locations and numbers to minimize any negative land use impacts or community consequences.

Should the Government not establish provincial rules regarding the location and number of cannabis consumption lounges, cafes or other establishments, clarification would

been needed with respect to the municipal government's role in doing so. This should include consideration of providing municipalities with specific authorities in this regard beyond current land use planning and zoning considerations.

Engagement with Municipalities will also be critical in determining the parameters for cannabis SOPs and establishing mitigation strategies for unintended consequences.

We are interested in any other comments or suggestions you wish to make about cannabis consumption establishments and/or SOPs.

Please submit your feedback on the Regulatory Registry by March 10, 2020
Privacy Statement

Please note that unless requested and agreed otherwise by the Ministry of the Attorney General, all materials or comments received from organizations in response to this consultation will be considered public information and may be used and disclosed by the ministry to assist the ministry in developing potential amendments to the cannabis framework. This may involve disclosing materials or comments, or summaries of them, to other interested parties during and after the request for public comment process.

An individual who provides materials or comments and who indicates an affiliation with an organization will be considered to have submitted those comments or materials on behalf of the organization so identified. Materials or comments received from individuals who do not indicate an affiliation with an organization will not be considered public information unless expressly stated otherwise by the individual. However, materials or comments from individuals may be used and disclosed by the ministry to assist in developing potential amendments.

Personal information of those who do not specify an organizational affiliation, such as an individual's name and contact details, will not be disclosed by the ministry without the individual's consent unless required by law. If you have any questions about the collection of this information, please contact the Legalization of Cannabis Branch at cannabis@ontario.ca.

References

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