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The Honourable Kathleen Ganley, Minister of Justice & Solicitor General

Cc: Breigh-Anne Albert of the Alberta Cannabis

By Email: Cannabis Secretariat acs@gov.ab.ca

Submission Regarding Alberta's Approach to the Legalization of Cannabis

Prevent Cancer Now is a Canadian national civil society organization that works to stop cancer before it starts, with scientific research, education and advocacy.

Eliminating hazards is the most effective way to prevent a host of environmentally linked adverse health outcomes including cancer, so we are pleased to submit the following comments regarding Alberta's approach to legalization of cannabis.

Prevent Cancer Now applauds Alberta's strong stance to protect children from second hand smoke, and takes this opportunity to highlight an important gap in these protections – smoke in multi-residential buildings. Consistent with policies under the *Canadian Human Rights Act* and workplace legislation, that smoking any product (cannabis, tobacco or other material) be banned in multi-unit residential buildings. If permitted, smoking should be restricted to detached shelters, at a significant distance from any building containing multiple dwelling units (e.g. a minimum of 10m from doors or windows).

Second hand smoke from combustible products such as cigarettes, cigars, and cannabis is an established health hazard. All smoke contains harmful particulates and numerous toxic chemicals that increase risks of cancers of the lung, mouth, throat, larynx, esophagus, bladder, kidney, pancreas and cervix. Exposure to smoke also impairs child development and increases risks of chronic diseases (e.g. cardiovascular, kidney and neurological disease).^{1, 2, 3} Hazard elimination is central to preventive health care strategies that save lives and can decrease health care expenditures. Unfortunately, the Alberta framework encourages smoking of cannabis within the home, and so does not address a major public health and safety issue, and misses the opportunity to prevent harms of second hand cannabis smoke.

The numbers of people exposed to second hand smoke at home is higher than elsewhere, as smoking is being banned from many public spaces. Statistics Canada reports that in 2014, over 121,000 Albertans aged 12 and over reported exposure to second hand smoke at home.⁴ The

¹ U.S. Department of Health and Human Services. The Health Consequences of Smoking- 50 Years of Progress. (2014). <https://www.surgeongeneral.gov/library/reports/50-years-of-progress/full-report.pdf>

² U.S. Department of Health and Human Services. The health consequences of involuntary exposure to tobacco smoke: A report of the Surgeon General. 2006: Atlanta, GA. Available from: <http://www.surgeongeneral.gov/library/reports/secondhandsmoke/fullreport.pdf> (accessed 19 October, 2017).

³ World Health Organization. Protection from exposure to second-hand smoke: Policy recommendations. 2007: Geneva. http://apps.who.int/iris/bitstream/10665/43677/1/9789241563413_eng.pdf (accessed 19 October 2017).

⁴ Statistics Canada. 2016. Exposure to second-hand smoke at home by sex, by province and territory (Number). <http://www.statcan.gc.ca/tables-tableaux/sum-som/l01/cst01/health96a-eng.htm>

exposure to second hand smoke in multi-unit dwellings is estimated to be proportionately higher than in other types of residential buildings due to shared structural elements that permit infiltration of air among units and hallways. This exposure represents an important air quality, and health and safety issue affecting residents and visitors.

As such, we recommend that:

- **smoking of cannabis be banned throughout multi-residential buildings, and**
- **the harms of smoking, including cannabis, to both smokers and bystanders, be communicated through regular education and training.**

We thank you for the opportunity to contribute to Alberta's strategy as cannabis is legalized.

Sincerely,

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