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**British Columbia Cannabis Secretariat**

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**Submission Regarding Cannabis Legalization and Regulation in British Columbia**

Response to Consultation: <https://engage.gov.bc.ca/BCcannabisregulation/>

*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 British Columbia's approach to regulation in the context of legalization of cannabis.

*Prevent Cancer Now* applauds British Columbia's strong stance to protect children from second hand smoke,<sup>1</sup> and takes this opportunity to highlight an important gap in these protections – smoke in multi-residential buildings, where smoke from neighbours infiltrates hallways and other units. Consistent with policy under the *Canadian Human Rights Act* and workplace legislation, we recommend that smoking any product (cannabis, tobacco or other materials) 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. As indicated by HealthLinkBC<sup>1</sup> and others, 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).<sup>2,3,4</sup> Hazard elimination is central to public health strategies that save lives and can decrease health care expenditures. Unfortunately, the British Columbia 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 (and other) 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 70000 of British Columbians aged 12 and over reported exposure to second hand smoke at

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<sup>1</sup> HealthLinkBC. The Harmful Effects of Second-hand Smoke. Accessed October, 2017.

<sup>2</sup> U.S. Department of Health and Human Services. The Health Consequences of Smoking- 50 Years of Progress. (2014). Accessed October 2017.

<https://www.surgeongeneral.gov/library/reports/50-years-of-progress/full-report.pdf>

<sup>3</sup> 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. Accessed October, 2017.

<http://www.surgeongeneral.gov/library/reports/secondhandsmoke/fullreport.pdf>

<sup>4</sup> World Health Organization. Protection from exposure to second-hand smoke: Policy recommendations. 2007: Geneva. Accessed 19 October 2017.

[http://apps.who.int/iris/bitstream/10665/43677/1/9789241563413\\_eng.pdf](http://apps.who.int/iris/bitstream/10665/43677/1/9789241563413_eng.pdf)

home.<sup>5</sup> The 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 involuntary, noxious exposure represents an important air quality, and health and safety issue affecting residents and visitors of all ages.

***Prevent Cancer Now* recommends that:**

- **An approach adhering to public health principles of hazard elimination as the preferred approach be incorporated into regulation of recreational cannabis;**
- **Smoking of cannabis be banned throughout multi-residential buildings; and**
- **The harms of smoking, including cannabis, to both smokers and bystanders, including children, be communicated through packaging, and regular education and training.**

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

Sincerely,

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<sup>5</sup> 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>