The Right Honorable Justin Trudeau, P.C., M.P.
Prime Minister of Canada
Office of the Prime Minister
80 Wellington Street
Ottawa, Ontario
Canada K1A 0A2

12 April 2017

Subject: A public health approach to the proposed legislation to legalize and regulate cannabis

Dear Prime Minister Trudeau,

Cannabis is the most commonly used illegal psychoactive substance in Canada and in the world. The United Nations Office on Drugs and Crime estimates that the cannabis consumption rate has remained relatively unchanged since 1998, at almost 4% of our world’s population. For the year 2014, this translates into over 180 million people. The Americas region, followed by Africa and Europe, remain the main markets for cannabis.

The World Federation of Public Health Associations (WFPHA) applauds the Government of Canada’s decision to enact legislation to legalize the non-medical production, distribution and use of cannabis. This is a bold step to address the ineffective prohibitionist approach presently in place in Canada and elsewhere, an approach that has had little impact on cannabis consumption, addiction and public health and safety.

Over the past few years, several states in the United States (Colorado, Washington, Alaska, Oregon, Nevada, Maine, Massachusetts and California) and the country of Uruguay have passed laws to permit, in varying and incremental degrees, the legal production, distribution and sale of cannabis for non-medical (recreational) purposes. Although a comprehensive analysis of the public health impacts remain to be seen, preliminary data from the US states suggests that legalized marijuana for recreational use has resulted in an increase in cannabis use, as well as in public health and public safety indicators (cannabis-related emergency room visits, hospitalizations, traffic accidents and related deaths). Concern has also been expressed about the means by which the states permit the marketing, sale and distribution of cannabis. This has led to the increased availability of a wide range of cannabis products, especially concentrated cannabis extract and cannabis-infused edibles, which pose public health concerns.

Your government’s cannabis strategy offers an opportunity to learn from these examples. The WFPHA encourages your government to learn as well from the successes and failings of alcohol and tobacco regulation. Cannabis regulation is an opportunity to demonstrate best practice in addiction prevention and treatment and in drug control. To make this happen, the core regulatory decision-making power should be based within a public health framework and involve actively and in a comprehensive fashion public health authorities.
Legalizing cannabis does not and should not ignore the significant health risks associated with this substance. The legislation must recognize and consider the real risks associated with cannabis consumption, to ensure that it includes disease/injury prevention and harm reduction approaches and the means/tools to prevent consumption among children and adolescents.

To achieve these public health objectives, the WFPHA, representing over public health associations in over 100 countries around the world, encourages the Government of Canada:

- To mandate Health Canada as the lead agency in crafting the legislation, and to ensure buy-in by the country’s provinces, territories and municipal/regional health authorities for the legislation’s implementation and enforcement;
- To prohibit the sale and consumption of cannabis to children and adolescents and to fix a minimum age that takes into account the health risks (including neurological development) associated with cannabis use in adolescents and young adults, regardless of the age of majority for the legal consumption of alcohol and tobacco;
- To ensure there is no oversimplification about cannabis and that its associated public health implications and consequences are taken into full consideration;
- To ensure quality control of the production of cannabis and regulation of the THC concentration;
- To create a state-managed sale and distribution network and to enact taxation measures to influence cannabis sales;
- To support and implement measures for prevention and harm reduction in schools, public places and the workplace;
- To prohibit the marketing, advertising and sponsorship associated with the sale of cannabis and cannabis-containing products;
- To allocate tax revenues from the sale of cannabis and cannabis-related products in support of the establishment and management of programs and activities necessary to manage its legalization and regulation;
- To differentiate legislation for medicinal and recreational cannabis;
- To criminalize driving under the influence of cannabis for all vehicles.

The eyes of the world’s public health community are on Canada. What your country does with respect to the legalization of cannabis will be an example for the world. We hope it will be a positive role model.

Yours sincerely,

Michael Moore AM
President World Federation of Public Health Associations