

To: Health Canada

Consultation Regarding the Proposed Approach to the Regulation of Cannabis

Recommendations by Families for Addiction Recovery (FAR)

FAR is in favour of the legalization of cannabis with a strict public health approach. Our recommendations on this consultation are limited to Question 9 regarding packaging and labelling. FAR is opposed to the branding of cannabis and its promotion to any consumers including adults. Branding and promotion will be allowed under the draft Cannabis Act. Accordingly, we encourage regulations which limit, to the extent possible under our laws, the branding and promotion of cannabis. This is consistent with a public health approach to psychoactive substances.

The solution to problematic substance use is not going to be on the supply side. Supply will always rise to meet demand. The solution will be through demand reduction. And the antithesis of demand reduction is branding, advertising, marketing, and promotion.

In 2011 The Health Officers Council of BC in a discussion paper regarding a public health approach to the regulation of psychoactive substances said this:

“One of the most important lessons learned from the commercialization of tobacco and alcohol is that product promotion is a significant driver of consumption and consequent increases in population harms. Therefore all promotion of substances will be prohibited.

Promotion comes in many forms and includes advertising, branding/naming, sponsorship, gifting, product association with film, leading personality recruitment, associating use with attractive activities such as sporting, socialization, sex, and vacations; pricing reductions (i.e. loss leaders); labelling suggestive of pleasure, enhanced performance, over stated benefits; creating similar products for children (i.e. chocolate cigarettes) or youth attractive products (e.g. alcopops, flavoured cigarettes and cigars); and other information presentations suggestive of performance enhancement.

Branding of substances products is critical to promotion, and once branding is allowed promotion is very difficult to prevent. Therefore, to prevent branding from occurring, substances should only be available in generic packaging.”¹(emphasis ours)

¹ The Health Officers Council of BC. *Public Health Perspectives for Regulating Psychoactive Substances (2011)* at p.30.
<https://healthofficerscouncil.files.wordpress.com/2012/12/regulated-models-v8-final.pdf>

Psychoactive substances sell themselves. With respect to cannabis, approximately 30% of users will develop cannabis use disorder². Dependence will develop in 5%-9% of adults and 17% of adolescents³. It is reasonable to assume that, as with alcohol and gambling, the majority of the profits of the cannabis industry will be derived from, and at the expense of, consumers with problematic use who will be targeted by the industry. Since cannabis is an addictive substance, adults also need protection from promotion of its use.

For these reasons we agree with the recommendations and limits suggested in the Consultation Paper on packaging and labelling, and we would add the following recommendations.

Labelling

Consumer information developed by Health Canada regarding the health effects of cannabis should include cannabinoid hyperemesis syndrome.

Health Warning Messages

Labels should contain a warning that cannabis can be addictive in order to counter the widely held belief that it is not addictive. Labels should further elaborate that the risk of addiction is greater for adolescents. Like alcohol and tobacco, we can expect underage users to get their supply from social contacts who legally purchase the product.

Appearance of Packaging

It is difficult to imagine packaging that is attractive to an 18 year old (which is permitted) and not attractive to a 17 year old (which is not permitted). We recommend no use of colour and the most restrictive regulations for branding elements permissible by law.

About FAR

Families for Addiction Recovery (FAR) is a Canadian registered charity founded out of the lived experience of parents whose children have struggled with substance use disorder (SUD) from an early age. FAR's mission is to protect people, particularly teenagers and young adults, struggling with SUD and support their families. FAR aims to change the face of addiction by advocating

² Hasin DS, Saha TD, Kerridge BT, et al. *Prevalence of Marijuana Use Disorders in the United States Between 2001-2002 and 2012-2013*. *JAMA Psychiatry*. 2015;72(12):1235-1242.

doi:10.1001/jamapsychiatry.2015.1858.

<http://www.ncbi.nlm.nih.gov/pubmed/26502112>

³ Canadian Centre on Substance Abuse (2015). *The Effects of Cannabis Use During Adolescence*.(p.48)

<http://www.ccsa.ca/Resource%20Library/CCSA-Effects-of-Cannabis-Use-during-Adolescence-Report-2015-en.pdf>

for publicly-funded, timely, compassionate, evidence-based treatment, reducing harms, supporting research and working to end stigma.

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