



Canadian Mental  
Health Association  
Ontario

Association canadienne  
pour la santé mentale  
Ontario

Standing Committee on Social Policy  
Room 425, Main Legislative Building, Queen's Park  
Toronto ON, M7A 1A8

October 11, 2018

**Re: Legalization and Regulation of Cannabis in Ontario**

Thank you for this opportunity to provide our perspective on the legalization and regulation of cannabis in Ontario.

The Canadian Mental Health Association (CMHA) network consists of 30 branches across the province that provide community-based clinical and social services to Ontarians living with mental health and addictions-related issues. We offer comprehensive substance use and harm reduction-related supports, including Rapid Access to Addictions Medicine (RAAM) clinics, youth addictions programming, managed alcohol programs, and a broad range of outpatient substance use counselling and supports. We offer our perspective and recommendations as a mental health and addictions treatment provider.

**As the Government of Ontario moves towards legalizing and regulating cannabis, CMHA Ontario and our local branches strongly advise an approach that considers public health as the primary objective.** We feel that legalization and regulation of cannabis provides an opportunity to broaden a conversation about substance use and mental health, and that legalization should take place in tandem with a public health approach that addresses the addictions and mental health needs of Ontarians.

CMHA Ontario also believes that now is the time for comprehensive public awareness campaigns that identify potential consumption harms, especially for those at higher risk, including youth and people who use cannabis frequently. We strongly encourage the government to take into consideration the importance of a public health approach to this issue, and the crucial role of mental health and addictions services during this time of transition. We would also like to highlight the role community-based mental health and addictions agencies play in health promotion, education and service provision. CMHA Ontario and our local branches offer our support to government to enhance their public education efforts prior to the October 17, 2018 legalization date.

With these factors in mind, CMHA Ontario would like to provide recommendations that consider the role of community-based mental health and addictions services, public education and youth.

## 1) The Role of Community-Based Mental Health and Addictions in Cannabis legalization and regulation

While there are many unknowns, the upcoming legalization of cannabis in Canada is not without risks and may lead to an increase in use among Ontarians. While there are important lessons learned from other jurisdictions, no country has conducted national long-term studies on the impact of cannabis legalization and regulation on their population. As a result, both the federal and provincial governments need to ensure there are safeguards in place, specifically as they relate to mental health and addictions service provision for cannabis users.

CMHA Ontario recognizes that the need for mental health- and addictions-related supports may increase with cannabis legalization. Research shows a link between frequent cannabis use and mental health, especially if there is a personal or family history, or if cannabis use is initiated during mid-teen years.<sup>1</sup> Harm-reduction initiatives and access to resources to support Ontarians to make informed decisions about cannabis use is a key component to ensure at-risk individuals are informed and able to access treatment. Increased mental health and addictions services and supports are also required to support Ontarians facing problematic cannabis use.

CMHA Ontario supports the Mental Health Commission of Canada's recommendation to increase spending on mental health and addictions services to nine per cent of the overall provincial health care budget.<sup>2</sup> This increase is especially necessary during this period of transition where Ontarians may have additional needs. The revenue generated from cannabis sales across the province may assist in meeting current gaps in funding for the community-based mental health and addictions sector.

### Recommendations:

- The Government of Ontario should consult and partner with CMHAs and other community-based mental health and addictions service providers across the province to develop and implement a comprehensive public awareness campaign regarding cannabis associated health risks.
- Enhance access to treatment and expand treatment options, specifically for youth and frequent cannabis consumers, ranging from brief interventions for at-risk users to more intensive interventions.
- Provide further funding for new or existing services and community support programs, such as those offered by local CMHA branches, which are dedicated to frequent cannabis consumers, and those who may be living with mental health and/or addictions issues.
- Provide funding for extensive research examining the relationship between early onset use of cannabis on brain development, particularly with mental health and addictions issues.

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<sup>1</sup> Hall, W. (2015). What has research over the past two decades revealed about the adverse health effects of recreational cannabis use? *Addiction*. 30, 110.

<sup>2</sup> Mental Health Commission of Canada (2012). *Changing directions, changing lives: The mental health strategy for Canada*. Calgary: MHCC.

- Allocate funding for the development of more widespread community resources for youth in order to ensure mental health and addictions supports are accessible when they are needed.
- CMHA Ontario recommends that all cannabis-related tax revenue be allocated for mental health and addictions services.

## 2) Public Education

CMHA Ontario supports advertising regulations and limitations as we believe that public health interests must take precedence over the interests of the cannabis industry. CMHA Ontario supports a Cannabis Card program, as put forth by CMHA National's Cannabis Policy Plan.<sup>3</sup> A Cannabis Card program could operate in a similar manner to the Ontario Smart Serve program and could provide training to cannabis retail staff to inform customers of the potential harms and benefits of cannabis, including mental health and addictions information, road safety, and the current laws and regulations. The program would ensure safe sales of cannabis, create informed staff and spread knowledge to cannabis users.

In addition, CMHA Ontario believes that a robust education campaign is necessary for the general public, but also particularly for youth. This should start early with age-appropriate content, created with the input of youth, including those who use cannabis, and delivered by trained facilitators or peers. According to a survey by the Canadian Centre on Substance Use and Addiction, youth perceptions of cannabis and the legal consequences for possession were not clearly understood.<sup>4</sup> Many respondents were unaware of what was legal and illegal. It is imperative that youth be involved in planning and education regarding legalization to make informed decisions about cannabis consumption.

Public-education initiatives are a key component to a health-focused cannabis framework and should be a priority. In this regard, CMHA Ontario has already helped with the campus communities. In partnership with Centre for Innovation in Campus Mental Health and the Centre for Addiction and Mental Health, we developed a tool-kit, [Reducing Cannabis Harms: A Guide for Ontario Campuses](#), to provide campus professionals information and best practices for engaging with students on issues related to cannabis on Ontario campuses. CMHAs across Ontario are well positioned to support the Government of Ontario in protecting the health and wellbeing of Ontarians as these changes come into effect and can support in the development of public awareness campaigns and community service initiatives.

### Recommendations:

- Apply advertising and marketing restrictions to minimize the profile and attractiveness of cannabis products (i.e.: sponsorships, endorsements or branding) similar to the restrictions on promotion of tobacco products, and provide educational information to consumers.

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<sup>3</sup> Canadian Mental Health Association, National. (2017). Cannabis Policy Plan.

<sup>4</sup> Canadian Centre for Substance Use and Addiction. (2017) Canadian Youth Perceptions on Cannabis. Retrieved from: <http://www.ccsa.ca/Resource%20Library/CCSA-Canadian-Youth-Perceptions-on-Cannabis-Report-2017-en.pdf>

- Distribution of cannabis should include the provision of cannabis education to patrons through the implementation of a Cannabis Card program, similar to Ontario's Smart Serve program.
- Education for those that distribute cannabis to consumers should be considered, and CMHA Ontario strongly encourages the use of a Cannabis Card program, similar to Ontario's Smart Serve program.

### 3) Youth

Cannabis is the most commonly used illegal drug in Canada, where more than 40 per cent of Canadians have used cannabis in their lifetime, and about 10 per cent of the population having used within the past year.<sup>5</sup> In June 2016, a discussion paper developed by a nine-member Task Force on Cannabis Legalization and Regulation included the objective to protect young people by keeping cannabis out of the hands of children and youth.<sup>6</sup> Despite this goal, research shows that cannabis use in Canada is most common between adolescents and young adults, with approximately 40 per cent of youth aged 18-29 in Ontario have used cannabis within the past year.<sup>7</sup>

Given that youth usage is higher than adults, it is important to balance issues of health and access and ensure that there is an appropriate minimum age that does not encourage young people in Ontario to purchase cannabis through illegal means. CMHA Ontario supports the minimum age to purchase cannabis consumption to 19.

We also believe that young people in possession of cannabis should not be criminalized. The criminalization of cannabis possession heightens health and social harms, especially for youth. CMHA Ontario recommends that youth under 19 remain outside of the justice system if in possession of small quantities of cannabis.

It is also important to consider the evidence that suggests that cannabis consumption may have negative impacts on mental health. The research regarding cannabis use and the development of mental health issues varies, with some studies revealing correlations, particularly with youth and the development of psychotic disorders.<sup>8</sup> No matter the mental health issue or illness of concern, evidence-based research providing a direct causal relationship to cannabis use is lacking. While some mental illnesses may have stronger links to cannabis use than others, more research is needed in this area.

As a result, education and health promotion, and access to community-based mental health and addictions supports is an essential component when considering cannabis use with youth.

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<sup>5</sup> Government of Canada. (2016). Towards the Legalization, Regulation and Restriction of Access to Marijuana – Discussion paper. (2016). Retrieved from: <http://healthycanadians.gc.ca/health-system-systeme-sante/consultations/legalization-marijuana-legalisation/document-eng.php>

<sup>6</sup> Task Force on Cannabis Legalization and Regulation. (2017). A Framework for the Legalization and Regulation of Cannabis in Canada. Retrieved From: <https://www.canada.ca/en/services/health/marijuana-cannabis/task-force-cannabis-legalization-regulation.html>

<sup>7</sup> La Iomiteanu AR, Hamilton H, Adlaf, EM, Mann RE (2014). CAMH Monitor eReport 2013: Substance use, mental health and well-being among Ontario adults, 1977-2013. CAMH Research Document Series No. 40. Toronto: CAMH.

<sup>8</sup> Radhakrishnan et. al. (2014). Gone to Pot- a Review of the Association Between Cannabis and Psychosis. *Frontiers in Psychiatry*. 5:1

## Recommendations:

- In order to reduce the potential harms, cannabis education is a necessary component in the legalization and regulation process. CMHA Ontario recommends developing a robust public education campaign beginning at young age with age appropriate content, created with the input of youth.
- Provide funding for extensive research examining the relationship between early onset use of cannabis on brain development, particularly with mental health and addictions issues.
- Allocate funding for the development of more widespread community resources for youth in order to ensure mental health and addictions supports are accessible when they are needed.
- Ensure that youth are not criminalized for personal possession of cannabis and provide a comprehensive system that would allow for young people to be connected to health and social services, counselling and education instead of criminal sanctions for personal cannabis possession in small quantities.

CMHA Ontario has been actively engaged in consultations and educational initiatives regarding the upcoming cannabis legalization and regulation. Cannabis legalization will have impacts on Ontarians, and it is crucial that a public health approach be a priority across the province. CMHA Ontario welcomes the opportunity to further consult with government about cannabis legalization.

Sincerely,



Camille Quenneville  
Chief Executive Officer  
Canadian Mental Health Association, Ontario

## About Canadian Mental Health Association, Ontario

The Canadian Mental Health Association (CMHA) operates at the local, provincial and national levels across Canada. The mission of CMHA Ontario – a not-for-profit, charitable organization funded by the provincial Ministry of Health and Long-Term Care – is to improve the lives of all Ontarians through leadership, collaboration and the continual pursuit of excellence in community-based mental health and addictions services. Our vision is a society that embraces and invests in the mental health of all people. As a leader in community mental health and addictions, we are a trusted advisor to government and actively contribute to health systems development through policy formulation and recommendations that promote mental health for all Ontarians. We support our 30 community CMHA branches which, together with other community-based mental health and addictions service providers, serve approximately 500,000 Ontarians each year.