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Re: A Public Health Approach to Non-Medical Cannabis

As you are aware, dried cannabis, cannabis oils, plants and seeds were legalized in Canada on October 17, 2018. The federal government made the decision to legalize non-medical cannabis based on evidence suggesting that the prohibition of cannabis has not reduced cannabis use and associated harms. The main objectives of legalization are to prevent youth from accessing cannabis, to protect public health and safety through product safety and quality requirements, to deter criminal activity by imposing serious criminal penalties for those operating outside the legal framework, and to reduce the burden on the criminal justice system in relation to cannabis. Edibles and other cannabis products (such as beverages and candy) will not be legal until separate federal legislation passes, which may occur in 2019.

The federal government has tasked provincial and territorial governments with regulating retail and distribution within their jurisdictions. BC has established the following key regulations around non-medical cannabis:

- Minimum age for purchase at 19
- There will be a hybrid system of public and private retailers
- No co-selling of cannabis with liquor or tobacco
- Personal cultivation and possession regulations will allow the growing of up to four plants per household
- Consumption will generally be allowed in public spaces where tobacco and vaping are currently permitted

The legalization of non-medical cannabis will have an impact on First Nations in BC in a number of key areas, including public health and safety, community regulations and decision-making, and economic opportunities.

In accordance with the 7 Directives, the First Nations Health Authority (FNHA) upholds each First Nation's rights, interests and self-determination. This means that we recognize that communities will exercise their rights to decide whether to pursue cannabis-related economic opportunities and hold no position on this matter. Our role is to serve as a health and wellness partner to BC First Nations children, families, and communities. In this context, the FNHA looks forward to working with communities from a health perspective to support our citizens with information and skills to help their decision-making.

FNHA supports a public health approach to cannabis access and use. This means we are focused on protecting and promoting health while reducing the negative health outcomes associated with cannabis use. We are focused on responsible use, harm reduction and individual and community safety.

We recognize that we have a shared responsibility, along with community leaders and our health system partners, to work together to ensure that all First Nations in BC have a good understanding of the facts, considerations, harms and available resources when it comes to using cannabis.

Over the coming weeks and months, FNHA will be undertaking a number of different initiatives and activities in support of greater public health awareness, including:

- Developing a community resource guidebook to better help communities develop and plan for health-related changes, including bylaws and guidelines. Key issues can include: land use management, business regulations, public consumption, cannabis in the workplace and regulation enforcement.
- Ongoing engagement and dialogue with communities and leaders, including panel discussions at all Fall 2018 Regional Caucuses, which will allow us to better understand the unique concerns facing communities and focus on providing resources and supports. Speaker panels, workshops or information booths will also be present at the upcoming Nursing Education Forum and Gathering Our Voices events.
- Launching a culturally-appropriate, Indigenous-specific public education campaign that will focus on two of the key public health issues around cannabis use: mental health and wellness with an emphasis on youth, and maternal child health, which focuses on prenatal, pregnant and breastfeeding women. This public education campaign will have a provincial reach and include public service announcements, public education resources (website content and promotional items) and print resources. We will also utilize diverse media and outreach strategies, such as social media platforms, YouTube and mentors/role models in order to better connect with youth.
- A central website, www.fnha.ca/cannabis, that houses key information relating to public health and cannabis, resources for First Nations in BC, and links to relevant provincial and federal legislation, contacts and resources.
- It is our priority to continue to follow the latest advances in medical evidence around cannabis use and use this new knowledge to inform our approach and train our health care workers.

We have received a lot of questions about medical cannabis. Access to medical cannabis for medical purposes will continue to be provided to those who are authorized by their healthcare practitioner, and this program will not be impacted by the legalization of non-medical cannabis. At this time, FNHA does not cover medical cannabis as a First Nations Health Benefit; however we will continue to review our policy against emerging clinical research and other benefit providers to ensure that our population is not in any way disadvantaged.

We know people use substances for any number of reasons, not always due to an addiction. Some people will work to abstain from drugs and alcohol and others may strive for moderation in their usage. We will continue to analyze and communicate the latest evidence, supports and resources as soon as we have it, and respect your decision to make an informed choice. In mitigating risk and reducing potential harms, we will share harm reduction options including discussions around safe transportation (e.g. designated drivers), choosing lower-potency products (e.g. THC:CBD ratio) and safer methods of use.

In closing, we look forward to sharing recent data related to self-reported cannabis use with BC First Nations leadership. I look forward to continuing to work with you and your community as your

health and wellness partner through this transition towards the legalization of non-medical cannabis.

In wellness,

Dr. Evan Adams Chief Medical Officer, First Nations Health Authority