

**Legalization of Recreational Cannabis in New Brunswick:  
A Social Work Perspective**

***Executive Summary***



**July 2017**

## **Introduction**

The New Brunswick Association of Social Workers (NBASW) is the regulatory body and professional association representing close to 1,900 members provincially. In this response, the NBASW seeks to contribute a social work perspective to the discussion on the legalization of recreational cannabis. As a value-based profession with a strong commitment to non-judgemental practice, the NBASW does not seek to make a moral statement on the legalization of cannabis. Instead we approach this issue from a harm-reduction standpoint, seeking to balance self-determination with protection of vulnerable populations.

## **Summary of Feedback**

### **Minimum Age**

The NBASW supports the recommendation to establish the minimum age limit at 19, consistent with provincial alcohol and tobacco laws. Age 19 is recognized in New Brunswick as the age of majority, indicating that individuals 19 and older are capable of making informed decisions regarding their own health and what constitutes acceptable personal risk. In applying a harm reduction lens, the NBASW believes that it is preferable that young adults access cannabis through a regulated source, thereby ensuring product quality and distributor safety. This recognition however comes with the continued responsibility of the provincial government and health professionals, including social workers, to educate New Brunswick citizens on the risks associated with cannabis use.

### **Retail Method**

The NBASW was pleased to learn that the New Brunswick government plans to use a provincial Crown corporation-operated retail model that will be limited to cannabis and associated products. Highly educated and trained staff in retail locations will be crucial to ensure consumers have access to a reliable source of information about the use of cannabis products and to promote lower-risk use. Typical consumers may not be familiar with the meaning of THC, CBD and pesticide content levels. Retail staff will be required to interpret this information and promote “label literacy” for cannabis products.

### **Marketing & Pricing of Cannabis Products**

The NBASW commends the introduction of restrictions to reduce the appeal of cannabis products to youth and would encourage strict restrictions on marketing tailored towards adults, even at point of sale. Any marketing or promotion permitted for cannabis products will work in direct opposition to educational campaigns. The NBASW supports the introduction of plain packaging for cannabis products, the prohibition of discount pricing on bulk purchases, and

higher price points for higher risk products. Sale of mixed products (cannabis mixed with alcohol or tobacco) should also be prohibited.

Although Bill C-45 does not include the regulation of Edibles, the NBASW sees the potential harm reduction benefits that may exist through the regulation of Edibles and is cautiously supportive of the introduction of this category, provided that it is accompanied by robust safeguards. When Edibles are introduced, the NBASW recommends that the following safeguards be implemented: Edibles must not resemble familiar food or drink such as candy; Edibles must not use sweeteners or other flavouring that would make them palatable to children, Edibles must use child-resistant, resealable packages; serving sizes and THC levels in Edibles must be limited. Any introduction of regulated Edibles will need to be accompanied by a corresponding educational campaign.

### **Personal Cultivation**

While it may be difficult to enforce regulations about where cannabis plants are cultivated in private homes, requirements should include lockable spaces, and securely fenced outdoor areas that are not visible to others. The production of cannabis concentrates in private households should be prohibited as the extraction process can be unsafe due to the use of flammable solvents. Starting materials for home cultivation of cannabis must be made available through legal, regulated sources.

### **Place of Use**

Recognizing that cannabis is already part of the Smoke-Free Places Act in New Brunswick, the NBASW does not believe that any further restrictions must be placed on public consumption.

### **Impaired Driving**

The NBASW urges the government not to introduce a “per se” THC limit until it can be supported by research. There does not appear to be consensus within the scientific community about what level of THC impairs driving performance. In the short-term an investment in Drug Recognition Expert (DRE) training to ensure sufficient availability of these experts in New Brunswick is required, while simultaneously supporting research to determine if the establishment of a “per se” TCH limit is scientifically supported.

### **Medical Access**

The NBASW is in favour of the Federal government’s decision to maintain medical access to cannabis as a distinct system. The NBASW wishes to express the importance of further research into the medical uses of cannabis and the

need for cannaboid-based medications that prove to be therapeutic to be approved as prescription drugs. The approval of such medications will allow for coverage through health plans, address cost issues, allow for distribution through pharmacies, as well as provide physicians with the information needed about these drugs to guide clinical decision making.

### **Possession by youth under 19**

The NBASW fully supports the recommendation that minor cannabis related offenses for those under 19 be addressed through a graduated penalty system. The NBASW strongly urges the provincial government to require that an educational component be associated with all penalties imposed on youth. In addition, identified youth should be given access to facilitated connections to needed community programs unrelated to their drug use.

### **Funds from Cannabis Sales & Public Education**

Educational programs for youth should be introduced at a young age through the public school system and should not adopt an abstinence only approach but should provide education about lower-risk use. Educational programs for adults must take a broad approach. Information should be provided in visual and audio formats as well as written content. Informational materials for use by parents, teachers and health care providers should be developed and made available before sales begin in 2018.

In addition to educational programs, funds from cannabis sales should be invested into existing social programs. Responsive programs must be available with adequate staffing to respond to New Brunswickers' needs quickly and effectively. Preventative programs should be expanded. Programs that ensure that the basic needs of citizens are met should be invested in, as research demonstrates that issues such as poverty contribute to the risk of substance use, while strong social supports and connections serve as protective factors.

### **Monitoring of Impacts**

It is crucial that reliable data is collected and analyzed to determine the impacts of the legalization of recreational cannabis and where additional safeguards or education may be necessary. Areas for monitoring will include: number of motor vehicle accidents involving cannabis impaired driving, number of individuals seeking support for cannabis use or addiction, number of visits to emergency rooms or physician's offices related to cannabis overdose and cannabis-induced psychosis.

## **Addendum**

During the NBASW's presentation to The Select Committee on Cannabis on July 28, 2017 the NBASW was asked for recommendations regarding the age at which education about cannabis should be introduced. The NBASW committed to providing a written response to this question.

The NBASW supports the introduction of educational programs at a young age through the public school system. The 2015 Canadian Tobacco, Alcohol and Drugs Survey found that Canadian youth are more likely to consume cannabis than their adult counterparts, with 21% of respondents aged 15–19 having used cannabis within the past year. Given that more than a fifth of Canadian youth have already used cannabis by age 15, the NBASW would recommend that Education regarding cannabis be introduced by middle-school to ensure youth have access to accurate information prior to their first encounter with cannabis. The NBASW would like to reiterate the importance that these education programs not adopt an abstinence only approach but should provide education about lower-risk use as well.

While the NBASW recommends middle-school as the appropriate time for introduction of cannabis-specific education, preventative programs that focus on positive mental health and resiliency should be implemented beginning in elementary school. These qualities may serve as protective factors and empower youth to choose not to use cannabis in the future.