

May 13, 2020

Mr. Chris Nepszy
Chief Administrative Officer
Town of Essex
33 Talbot Street South
Essex, N8M 1A8

Dear Mr. Nepszy

Proposed cannabis retailer in the Town of Essex, located at 6 King Street East, Harrow

The Windsor-Essex County Health Unit (WECHU) is writing in response to the recent pending approval of the Cannabis Retail Store Authorization application for **6 King Street East, Harrow**. Should you wish to review this location and provide feedback to the Alcohol and Gaming Commission of Ontario during the public consultation period, the following considerations may assist in determining whether it poses a risk to public health and safety, and exposure/access to youth and other vulnerable populations in the Town of Essex.

At this time, the *Ontario Regulation (O. Reg) 468/18* under the *Cannabis Licence Act* does not allow for a cannabis retail store to be located within 150 metres from a school or private school as defined in the *Education Act*; however, there are no other restrictions imposed from other sensitive use lands (e.g. daycares, playgrounds, mental health and addictions facilities). Additionally, municipalities are currently prohibited from using licensing or land-use by-laws to control the placement or number of cannabis retail outlets. Having a strong Policy Statement and providing feedback to the Alcohol Gaming Commission of Ontario is one way that the Town of Essex could reduce any risk to public health and safety.

Public Health Considerations and WECHU Recommendations for Cannabis Retail

When considering a location for a cannabis retailer, special consideration needs to be given to vulnerable populations (e.g., children and youth, those already struggling with substance addictions, etc.) and the inequitable impact that a chosen site location may have on particular populations within your community. It has been well established that closer retail outlet proximity to sensitive use spaces increases normalization among vulnerable populations.^{1,2} In addition, retail outlet proximity to youth-serving facilities normalizes and increases substance use.^{3,4} By supporting a more effective minimum distance requirement from youth-serving facilities such as schools, child care centres, libraries, and community centres, municipalities can prevent the role-modeling of cannabis use and reduce youth access.^{5,6,7}

In order to minimize the potential for vulnerable populations to access cannabis and reduce public exposure to environmental cannabis smoke, the WECHU recommends the following:

- That cannabis-related businesses **be no less than 500 metres** from any school, library, park, recreational centre and any other youth-serving facility.

- That cannabis-related businesses **be no less than 500 metres** from addiction and mental health facilities, hospitals and places of worship.
- That cannabis-related businesses **be no less than 500 metres** from any alcohol, tobacco, or other cannabis-related business.

The following is a summary of the sensitive land use or areas of concern, located within either 150 metres, 250 metres, or 500 metres of the proposed store **located at 6 King Street East, Harrow**. A visual map is also attached.

Sensitive Land Use or Area of Concern	Name	Address	Distance from Retailer (metres)
Community centre	HARROW YOUTH CENTRE	18 Queen Street, Harrow, N0R 1G0	150
Tobacco & E-cigarettes	COLONIAL VARIETY	50 King West, Harrow, N0R 1G0	150
Tobacco & E-cigarettes	SANFORD & SON SUPERMARKET	77 King East, Harrow, N0R 1G0	150
Tobacco & E-cigarettes	STOP N GO VARIETY	80 King East St, Harrow, N0R 1G0	150
Alcohol	LCBO	119 King Street West, Harrow, N0R 1G0	250
Childcare centre or school	ST ANTHONY CATHOLIC SCHOOL	166 Centre St W, Harrow, N0R 1G0	500
Library	HARROW BRANCH	140 King Street West, Harrow	500
Park and playground	HARROW FAIRGROUNDS PARK	243 Mcaffee Street, Harrow, N0R 1G0	500

In addition to the abovementioned areas of concern, the proposed cannabis retailer is also located within a residential area experiencing moderate to high levels of social inequity using a validated measure of inequity.

Should the Town of Essex wish to provide feedback regarding this application to the Registrar of the Alcohol and Gaming Commission, the WECHU is able to provide additional consultation and support. If you have any questions, would like to discuss these recommendations, or if you are interested in enhancing your current policy statement, I would be happy to arrange a meeting by phone or in person at your earliest convenience.

Thank you,



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Encl.

References

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3. U.S. Department of Health and Human Services. (2016). Facing Addiction in America: The Surgeon General's Report on Alcohol, Drugs, and Health. Retrieved from <https://addiction.surgeongeneral.gov/surgeon-generals-report.pdf>
4. Canadian Paediatric Society (2016). Cannabis and Canada's children and youth. Retrieved from <https://www.cps.ca/en/documents/position/cannabis-children-and-youth>
5. Ibid
6. Government of Canada. (2016). A framework for the legalization and regulation of cannabis in Canada: The final report of the task force on cannabis legalization and regulation. Retrieved from <http://www.healthycanadians.gc.ca/task-force-marijuana-groupe-etude/framework-cadre/alt/framework-cadre-eng.pdf>
7. Association of Municipalities of Ontario (2018). Municipal Cannabis Updater – Information to Help Municipal Staff Prepare Reports for Councils. Retrieved From <https://www.amo.on.ca/AMO-PDFs/Cannabis/Draft-Template-Municipal-Cannabis-Policy-Statement.aspx>

Map of Sensitive Land Use Areas within 500m of Proposed Cannabis Retailer at 6 King Street East, Harrow

