

July 31, 2017

Alberta Cannabis Secretariat  
Justice and Solicitor General  
10<sup>th</sup> Floor, Sun Life Building  
10123 99 Street SW  
Edmonton, AB T5J 3C6

### **Re: Cannabis Legalization in Alberta**

The Alberta Hotel & Lodging Association (AHLA) represents over 800 hotels, motels, inns, and resorts, which employ some 30,000 Albertans. We appreciate the opportunity to provide input on the legalization of cannabis in our province.

The AHLA and our members have worked in partnership with the Government of Alberta to sell and serve liquor and tobacco for almost 100 years, and we are well positioned to add cannabis products to this portfolio. The AHLA supports the Government of Alberta's policy priorities regarding the legalization of cannabis to:

- Keep cannabis out of the hands of children and youth
- Protect public health
- Promote safety on roads, in workplaces, and in public places
- Limit the illegal cannabis market

We believe the Government of Alberta can achieve these priorities and new economic benefits for all Albertans by leveraging the established resources and infrastructure that have proven successful for Alberta's liquor industry.

### **Advertising, Promotion, and Education**

The AHLA supports expanding existing regulations for alcohol and tobacco to cannabis, including regulations for advertising and promotion. The government should implement a comprehensive public education campaign to inform Albertans about cannabis use and the associated provincial regulations. We strongly encourage the government to educate Albertans about responsible use of alcohol, tobacco, and cannabis as part of the school curriculum starting no later than Grade Six.

### **Public Health & Safety**

The AHLA is aware of the research on the effects of cannabis use on the development of young adults. Controlling the potency and content of cannabis products available for sale to young adults will help to mitigate this risk. This will be more successful in protecting young adults than a higher minimum age that would leave room for the sale of unregulated products and potency levels through illegal trade.

A scientifically proven roadside test for cannabis impairment must be developed and implemented to ensure public safety on Alberta's roadways.

Current health & safety regulations should be adequate to keep workers and workplaces safe once cannabis has been legalized. We support employers' rights to strictly prohibit cannabis use in the workplace with exceptions for medical use by employees who have obtained a prescription from a physician. Resources should be made available to support employers that do not currently have such policies in place.

### **Regulation, Distribution, and Retailing**

An efficient and effective regulatory framework will be essential to assuring a successful transition to cannabis legalization in Alberta. The AHLA strongly supports leveraging Alberta's existing liquor industry model for the regulation, distribution, and sale of cannabis. This model can be quickly adapted to accommodate cannabis, and would be less risky and more cost effective than building a new model from the ground up.

The Alberta Gaming & Liquor Commission's (AGLC) mission is to ensure responsible gaming and liquor choices that deliver economic and social benefits to Albertans. AGLC has a proven track record of warehousing and providing oversight of the distribution of controlled products. AGLC has existing systems and infrastructure that can be leveraged for licensing premises for the sale and consumption of cannabis products, as well as industry inspections and training programs to ensure social responsibility. AGLC's existing ProServe responsible service training should be adapted to help licencees and their staff meet their responsibilities and to assure the responsible sale of cannabis in both service and retail environments.

### **Access**

The AHLA supports a minimum age of 18 years for the purchase and consumption of cannabis. This aligns with Alberta's legal drinking age and will help curb the illegal cannabis trade. To limit the illegal trade in cannabis, the Government of Alberta must ensure that:

- Albertans over the age of 18 who want to consume cannabis have convenient access to these products, regardless of where they live, and
- The supply of regulated cannabis is sufficient to meet consumer demand.

Alberta's licenced liquor retailers have a proven track record of responsibly serving regulated products in communities all over the province. We believe that AGLC designated Class D licensees would provide an efficient retail network that would ensure the availability of cannabis for sale across the province. AGLC license holders are well trained and experienced in the sale of age restricted products. Consumers are used to purchasing alcohol through these outlets and we believe the social use of cannabis to be very much aligned with the social use of alcohol. The AHLA would not oppose a requirement for Class D licencees to create a separate area for cannabis sales. For these reasons, we also support the sale and on-premise consumption of cannabis edibles in restaurants and

lounges with Class A Minors Prohibited licenses. The AHLA would not support a retail model where those under 18 are able to enter a facility without an adult.

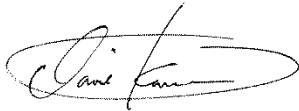
### Recommendations

The pending legalization of cannabis is already creating investment and economic growth opportunities for Alberta in the areas of cultivating, processing, and production.

We encourage the Government of Alberta to continue consulting with Albertans as this issue evolves, and to ensure that future policy continues to be based on scientific knowledge.

Leveraging Alberta's liquor model for the regulation, distribution, and sale of cannabis would maximize the efficiency of government resources. It would also create additional opportunities for new and established Alberta businesses that are part of Alberta's vibrant tourism and hospitality industry. This established, efficient, and proven model would allow the Government of Alberta to impose a modest markup on cannabis that would help limit illegal trade in cannabis and provide additional government revenue for the benefit of all Albertans.

Yours truly,



Dave Kaiser, CHA  
President & CEO

cc. Alberta Liquor and Gaming Commission