

October 12, 2018

Mayor and Council  
City of Langley  
20399 Douglas Crescent  
Langley BC V3A 4B3

To the Mayor and Council:

**Re: Amendments to City of Langley *Smoking Regulation Bylaw***

Thank you for the opportunity to provide comments on proposed amendments to the City of Langley *Smoking Regulation Bylaw*. Fraser Health's Population and Public Health Program supports the use of municipal regulations to ensure smoke-free spaces that support the health of residents in the region. Our review has found a number of areas in which the proposed amendments reflect best practices for public health, and areas in which further enhancement is recommended.

It is noted that the proposed amendment would expand the definition of "smoking" under the bylaw to include cannabis, and also enhances measures to prevent public exposure to second hand smoke. Specifically, these enhancements include an increase to the boundaries of no-smoking buffer zones, prohibiting smoking in a vehicle with children under the age of 16, and restricting both smoking and e-cigarette use in areas frequented by children.

It is particularly important that local regulations address the use of cannabis, in light of the impending decriminalization of cannabis use under the federal *Cannabis Act* (Bill C-45). Both direct and second-hand exposure to products of cannabis combustion must be considered, as well as the potential for re-normalization of smoking in public spaces. With regard to regulation of cannabis use in public spaces, this bylaw amendment is supported by best practices for public health, as detailed in the 2018 Fraser Health document *Medical Health Officer Recommendations: Recreational Cannabis Access and Use*. Limiting public consumption of both tobacco and cannabis can support the continued de-normalization of smoking, and reduce smoking uptake among youth. Research has shown that smoke-free regulations targeting public places where youths tend to congregate (e.g. sporting events, concerts, shopping malls, and public transportation) are associated with reduced initiation and self-reported use of cigarettes among children and adolescents. By limiting areas where cannabis can be consumed, regulators such as municipal governments can reduce the exposure of young people to cannabis, such that young people may delay initiation or never start at all.

It is noted that the City of Langley has already taken measures to include the use of electronic smoking devices and hookah products within the bylaw's definition of "smoke" or "smoking". This approach is consistent with recommendations of numerous public health agencies, including the World Health Organization Framework Convention on Tobacco Control. To address e-cigarettes, hookah, and cannabis under a municipal smoking bylaw promotes a consistent, easily-understood and widely-supported stance that smoking of any kind should be prohibited in public spaces.

The City of Langley bylaw amendment specifies an increase from 3 to 6 meters as the minimum distance a person who is smoking must be from a door, open window, or air intake of a building, or customer service area. The amendment also prohibits smoking in transit shelters, parks and public facilities, except within designated smoking areas. While the proposed buffer is likely to reduce second-hand exposure to smoke, for more comprehensive promotion of smoke-free environments we would recommend a larger smoke-free buffer zone (10-25m), to limit not only second-hand exposure but also visible observation of smoking practices, particularly by children and youth. Such a buffer should apply to any recreation area, playground, transit shelter, school, or childcare facility to both promote clean air and model smoke-free living for all ages.

Another recommended regulation is to prohibit smoking on sidewalks and boulevards, an area not specifically addressed in the current bylaw or proposed amendment. Community members may spend substantial time in close proximity to one another when on a sidewalk (for example when walking in the same direction or at intersections), and prohibition of smoking in this context can further limit second-hand exposure and visibility of smoking. As well, spent cigarette 'butts' do not decompose and contain concentrated chemicals hazardous to small children and animals. A municipal bylaw prohibiting smoking on sidewalks may also reduce such litter on sidewalks and streets. These expanded specifications of public smoke-free public areas can provide further protection from the harms of exposure to second-hand smoke and smoking-related litter, and are recommended by the Medical Health Officer.

Thank you for the opportunity to provide comments through this letter, and for the efforts of the City of Langley to promote residents' health through municipal policy. I would be pleased to discuss this issue further at your convenience.

Sincerely,



Michael Schwandt, MD MPH CCFP FRCPC  
Medical Health Officer

Cc: Victoria Lee, Chief Medical Health Officer and VP Population Health, Fraser Health  
Kelly Kenny, Corporate Officer, City of Langley