

August 3, 2017

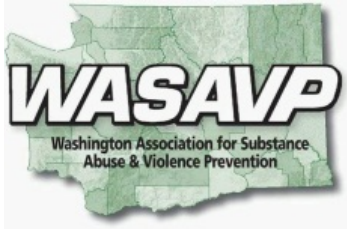
Dear Members of the Board (LCB),

WASAVP is the professional association for substance abuse professionals in Washington State. Our focus is on preventing harms to Washington youth by reducing risk factors, and increasing protective factors, related to the enforcement, access, norms and policy associated with substances of abuse.

Please accept the following feedback on proposed ruled related to alcohol and cannabis. Alcohol and cannabis have been the primary drugs of abuse among WA youth for years—before, during and after the deregulation of spirits sales and commercialization of cannabis. It is from this place of concern for the current and future youth of our state that we frame our suggestions:

Alcohol

- **SHB 1038 Additional winery locations for sampling and sales (four instead of two).** *WASAVP: moderate concern regarding availability to minors and the gradual normalization of alcohol consumption as part of everyday life in Washington.*
- **SHB 1176 Licensees allowed to sell growlers of beer and cider can also sell growlers of mead.** *WASAVP: moderate concern in principle due to such sales now being allowed in grocery stores where youth of all ages and families are present and the impact on the gradual normalization of alcohol availability in the everyday lives of youth.*
- **2SHB 1351 Creates a new off-premises retail license that allows the sale of spirits, beer, and wine at retail in bottles, cans, and original containers.** *WASAVP: some concern regarding combining of licenses, however facilitating the sales of alcohol on a population level has been demonstrated (along with other factors) to “trickle down” to influence youth availability.*
- **HB 1718 Creates a wine auction permit.** *WASAVP: some concern, however consider the gradual move towards increasing availability of alcohol—when access to one form of alcohol is allowed, soon other forms “cry foul” and are allowed as well, the net result being additional ease of accessing alcohol and impact of broader community norms that impact youth.*
- **SHB 1902 Creates a caterer’s endorsement for a tavern license.** *WASAVP: some concern however responsible vendor/server rules should be strictly enforced, and the impact on the gradual normalization of alcohol availability in the everyday lives of youth.*
- **SSB 5537 Authorizes licensed spirits distributors to sell spirits that cannot reasonably be sold in the normal course of business, directly to full-time employees of the distributor.** *WASAVP: some concern; suggest extra enforcement attention due to possibility of diversion of damaged product to the black market.*
- **SSB 5589 Distillery promotion items and spirits sampling. Allows licensed distillers to use mixers, water and/or ice in their sampling activities.** *WASAVP: moderate/high concern due to mixers and sweetened alcohol drinks being attractive to youth, sweeter beverages having the*



potential impact of encouraging overconsumption by masking the taste of alcohol, and creates another venue where youth will witness parents/adults consuming then likely getting into a car (impairment starts at the first sip) impacting healthy perceived norms about alcohol use in general as well as DUI.

Cannabis

- **ESSB 5131 Addressing provision concerning marijuana with respect to research licenses, local authority notifications, the retail licensing application process, processor wholesale events, and jurisdictional requirements.** *WASAVP: we support the ability to research today's high THC content cannabis, support local municipal control over cannabis laws/rules, support tight regulation and anti-monopoly policy in the application process, limiting public access to industry wholesale events, and overall tighter regulation of the industry. In general, however, we are concerned about the commercialization of the industry and resultant policy creep towards normalizing cannabis as a "rite of passage" for you WA youth.*
- **ESSB 5131 Addressing advertising regulations.** *WASAVP: we strongly support tightened advertising regulations including, limited scope of billboards (we prefer no billboards), tightened e-commerce regulations, restrictions including age verification on websites selling or advertising cannabis, restriction on advertising on ports of entry, and additional efforts to address illegal web-based cannabis delivery services.*
- **SB 5130 Increasing marijuana license fees and adding a temporary additional fee on marijuana licenses issued by the LCB.** *WASAVP: we support increased fees in general as any pressure to increase street price of cannabis results in lower youth access on a broad scale; we support additional fees being used for LCB traceability efforts, we also support additional fees being used to support additional enforcement officers which we believe to be stretched so thin as to limit their effectiveness.*
- **HB 1250 Authorizing retail marijuana outlets to give a free lockable drug box to adults age 21 and over and qualifying patients 18 and over subject to restrictions.** *WASAVP: we support this rule and recommend tight restrictions on the lockboxes including no cannabis advertising on the exterior of the box, no additional product giveaways or samples with the box, a funding stream be pursued to provides such boxes to all retail outlets or incentives for them to provide them themselves and for the LCB to retain the ability to require additional safety materials to be included in the give-away.*

Thank you for your focus on youth health and safety in the evolving commercial alcohol and cannabis market places. Please consider the impact on social norms and perceptions of WA youth growing up with these industries expanding and being more visible both in print and in living rooms. We encourage a "10,000 foot" perspective on the long term impact of deregulated spirits sales and commercial cannabis and support policies now that will help protect future generations of WA youth.