

August 20, 2018

Dear Councillor & Staff,

Re. Private Cannabis Retailers and BC Municipalities

The Canadian Association of Medical Cannabis Dispensaries (CAMCD) is a private, not-for-profit corporation established in 2011. We represent cannabis retailers who are compliant with municipal bylaws and provincial legislation.

CAMCD has evolved along with advancements in the legal non-medical legislation, and currently works with non-medical cannabis retailers. All our members abide by a code of conduct and required organizational practices, and we have also developed standards and a certification program.

One of our key mandates has been to bring cannabis retail into the legal framework. To that end, we have worked with several municipalities in British Columbia to develop regulations for the licensing of private retailers. We advocated successfully for the inclusion of private retailers in the federal Cannabis Act, to be operationalized by the provinces and municipalities. We also advocated successfully for existing municipally licensed and approved dispensaries to have the opportunity to transition into the provincially regulated industry.

Regulation of the cannabis industry holds great promise for British Columbia and its municipalities. The cannabis industry currently represents from \$2 to \$7 billion in annual revenue for the province. An important part of the success of legalization in meeting the goal of eliminating the illicit market, as well as realizing the economic potential of this industry, is incorporating the pre-existing market into the new legal framework (see [Transitioning Canada's Cannabis Industry](#)).

The BC Chamber of Commerce unanimously passed a resolution at their AGM in May 2018, calling for the inclusion and support of small local business in the new legal cannabis industry, including private retailers and small 'craft' producers. Specifically, the resolution makes the following requests to the provincial government:

1. Take measures to protect the interests of BC cannabis businesses by providing enhanced market access to micro license applicants.
2. Create a mechanism for craft producers to sell direct to private cannabis retailers.
3. Create a private distribution license.
4. We as a Chamber suggest that the government engage with all relevant stakeholders including the Canadian Association of Medical Cannabis Dispensaries.

We hope that your municipality will support local private cannabis retailers.

Specifically, we are asking that you support small local cannabis retail businesses by:

1. Approving provincial private cannabis retail applications

A successful application for a provincial cannabis retail license will require the support of the prospective retailer's municipality. Osoyoos council recently approved a motion to license only private retailers in their municipality, and not allow provincially run retail. They felt that private retailers were a better option for cost-recovery through business licensing, and also want to support local small businesses.

We ask that you support small 'mom and pop' local retailers, and provide them an opportunity to thrive in the face of [competition with 'big business'](#).

2. Minimizing disruption of service for currently existing dispensaries

Many of the currently operating dispensaries will be seeking to transition to the new legal market. This may entail an interruption of services for a period of time until their application is approved. The disruption of services will have a negative impact on the individual business, their employees numbering in the thousands, their customers/patients and the larger community.

We ask that you help minimize these negative impacts by permitting currently operating dispensaries that are municipally compliant and approved, and in particular CAMCD members, to continue operations at least until October 17, 2018.

3. Creating a timely and efficient municipal approval process

Whether currently existing, or aspiring entrepreneurs, a timely municipal approval process will support small businesses to enter the legal market. These small businesses will be carrying over-head and administrative expenses while awaiting provincial licensing and the ability to commence operations, which for some may amount to an unfeasible financial burden.

We ask that you seek to minimize this financial burden to small local businesses by creating a timely and efficient municipal approval process so that businesses can commence operations as soon as possible after October 17, 2018.

We would like to request to meet with your council and staff to share our extensive experience with private cannabis retail, and discuss in detail how we can help you develop a framework that works for your community and supports local business. We invite any questions you may have.

Sincerely,

Jeremy Jacob, President CAMCD
Rielle Capler, MHA, PhD, Executive Director, CAMCD