



July 5, 2018

To:

The Honourable Jody Wilson-Raybould, Minister of Justice and Attorney General of Canada;
The Honourable David Eby, Attorney General, Province of British Columbia;
The Honourable Adrian Dix, Minister of Health, Province of British Columbia;
The Honourable Bruce Ralston, Minister of Jobs, Trade and Technology, Province of BC

On behalf of the Texada Island Chamber of Commerce, I would like to express that our organization has an interest in safely supporting local producers of cannabis and cannabis-derived products on Texada Island. As our country and province navigate through a changing legal and regulatory framework, our organization would like to do what we can to support local small business development opportunities within the cannabis industry.

Texada is one of BC's many rural communities trying to diversify its economy. The Texada Island Chamber of Commerce supports the legitimization of the local cannabis industry and jobs associated with it. Texada has very few year-round residents and very few job opportunities beyond the few offered at the local quarries or in forestry. Texada has a historically well-known cannabis identity, which – if legitimized - could support increased tourism-related activity, which would boost local spending at our two grocery stores and three restaurants, the gas station, as well as spending on other local small businesses, such as in artist studios, etc.

Jobs in the cannabis industry can be done by people of any age. With many British Columbia seniors living in low income circumstances, jobs in the cannabis industry represent one agricultural option that could present new jobs for seniors so that they can live with greater food and income security. BC has the highest rate of seniors living in poverty Canada. This statistic has a 'ring of reality' to it for some of our residents. Texada has the 5th-oldest population per capita in Canada (nearly tied with Sidney, BC).

Jobs in this industry could also represent opportunities to retain our young people to offer them an income stream option to remain on the island. We believe there could be many jobs related to this industry, such as local growers, producers, microprocessors, and those involved in secondary value industries (e.g., hemp paper, food products and clothing, oils for topical salves, etc.). It wasn't so long ago that microbreweries were illegal. We see the local micro cannabis industry as a similar production opportunity to support local, micro-producers.

With this letter, the Texada Island Chamber of Commerce is asking both the federal and provincial governments, on behalf of local medical cannabis stakeholders (farmers, consumers, sales venues), to allow small/micro local cannabis growers and their and cannabis-derived products to be available for sale through local storefront dispensaries – currently nearby in Powell River, and perhaps someday on Texada. It would be ideal if small cannabis growers could operate legally, whether that's recreationally or medicinally and be able to sell their full crops or secondary products.



As you are aware, Section 56 of the federal Controlled Drugs and Substances Act allows the Minister of Health to grant an exemption to a controlled substance (as cannabis is presently classed), and to a class of persons if the exemption is necessary for medical purposes.

Section 130 of the proposed British Columbia provincial Bill 30 (Cannabis Control and Licensing Act) allows exemptions from the Lieutenant Governor to be given for cannabis, and for people and places involved therein. The Texada Island Chamber of Commerce supports exemptions for locally grown medical cannabis, licensed local growers, community-supported dispensaries that retail medical cannabis, and the medical clients that access local supply.

It is our Chamber's understanding that the way the provincial cannabis control and licensing act has been written (April 2018), all cannabis supply will need to come through federally-regulated Licensed Producers (LP's) that are very large – the kind that trade on the stock market. As such, we have concern that this new regulatory framework would negate any opportunities for small, local producers to legitimize, which is concerning. Buying goods from companies far from our island's shores is not helpful to diversifying and supporting our local jobs and economy generally. We are doing our best to support all 'shop local' options. We do not support any government approach that would limit small business access to markets.

The Chamber is also concerned about the severity of penalties in the laws in proposed Bill C-45, the new federal cannabis act. A person would be legally able to possess 30 dried grams of cannabis. Should a person possess between 30 and 50 grams, a ticket and a fine could be levied. For any amount beyond 50 grams, a maximum sentence would be five years less-a-day. For selling and distribution, the maximum sentence would be 8 years less-a-day. For growing cannabis, a sentence would be 14 years less-a-day. These penalties seem designed to decimate and incarcerate any local, small producers. We have concern that these penalties do not seem just in comparison to other major Canadian crime sentences and our Chamber does not support the implementation of those severe penalties. It is also difficult for us to comprehend why cannabis will be legal to smoke but not legal to consume as an edible product as well.

Our organization has done its best to try and understand the ideas our country and province have for legalizing and regulating the cannabis industry. If there is something that we have misunderstood about Canada's and the Province of British Columbia's considerations under review then I apologize in advance.



In summary, we ask that the Government of British Columbia and or Government of Canada (according to the responsibilities of your jurisdictions):

1. Take measures to protect the interests of existing cannabis businesses by providing market access to micro license applicants. In particular, we would like micro licenses to be available for local growers so that they can sell directly to retailers. Make it simple: the regulations should not be onerous for small business.
2. Create a private distribution license. This will relieve the Liquor Distribution Branch from having to deal with small producers who will be regulated under the micro license categories, and help small producers gain access to the market.
3. Create a mechanism so that when micro license craft producers are regulated, they be allowed to ship directly to private cannabis retailers, avoiding added costs from Federal Licensed Producers (LP) and shipping costs. This will allow small businesses to work closely together to bring local, fresh, diverse craft-quality products to the regulated market at a competitive price.
4. Allow edible cannabis products to be legal. If it can be ingested by smoking it, making cannabis illegal to chew or swallow seems inappropriate.
5. Remove the threat of excessive incarceration sentencing plans to small local craft cannabis businesses that wish to produce cannabis products and sell directly to local retailers.

Thank you,
Cindy Babyn
President
Texada Island Chamber of Commerce

Cc. Rachel Blaney, Member of Parliament North Island-Powell River

Cc. Nicholas Simons, Member of the Legislative Assembly, Powell River-Sunshine Coast

Cc. Canadian Chamber of Commerce

Cc. Powell River Regional District