

**Ministry of Agriculture**  
**BRIEFING NOTE FOR DEPUTY MINISTER FOR INFORMATION FOR MEETING**

Ref: 188725

Date: July 25, 2018

**Title:** Meeting with Mayor Becker Regarding Cannabis Amendment

**Issue:** Mayor Becker of Pitt Meadows requested a meeting respecting recent cannabis related amendments to the Agricultural Land Reserve Use, Subdivision and Procedure Regulation (the Regulation)

**Background:** In 2013, the Province identified that cultivating medical cannabis met the definition of farm use under the *Agriculture Land Commission Act* (the Act). As such, its production facilities were permitted on land in the Agricultural Land Reserve (ALR). In 2015, the Province amended the Regulation to make medical cannabis a “designated farm use” that local governments could not prohibit. Local governments could still regulate siting and sizing of these production facilities. This regulatory amendment was not well received by local governments who wanted the ability to prohibit cannabis production within their jurisdictions.

In July of this year, the Province repealed the section of the Regulation that made all types of lawful medical cannabis production a designated farm use and replaced it with a new, carefully crafted designation related to medical and recreational cannabis production on the ALR. For ease of reference, I will call this regulatory change the “Amendment”.

s.13;s.16

s.13;s.16

Contact:s.15;s.19

ANALYST,s.15;s.19

ED \_\_\_\_\_

ADM \_\_\_\_\_

DM \_\_\_\_\_



# **Regulation of Cannabis: Agricultural Policy Decisions**

Ministry of Agriculture  
Cabinet Submissions

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# Regulation of Cannabis: Agricultural Policy Decisions

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Cabinet Submissions

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s.13; s.12

# Regulation of Cannabis: Agricultural Policy Decisions

Ministry of Agriculture  
Cabinet Submissions

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s.12; s.13

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s.13; s.12



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s.12; s.13

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s.12; s.13; s.14

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Withheld pursuant to/removed as

s.12; s.13

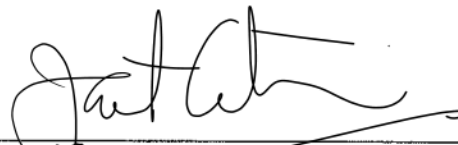
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Withheld pursuant to/removed as

s.13; s.12

**PROVINCE OF BRITISH COLUMBIA**  
**ORDER OF THE LIEUTENANT GOVERNOR IN COUNCIL**

Order in Council No. 380 , Approved and Ordered July 13, 2018

  
\_\_\_\_\_  
Lieutenant Governor

**Executive Council Chambers, Victoria**

On the recommendation of the undersigned, the Lieutenant Governor, by and with the advice and consent of the Executive Council, orders that the Agricultural Land Reserve Use, Subdivision and Procedure Regulation, B.C. Reg. 171/2002, is amended as set out in the attached Schedule.



\_\_\_\_\_  
Minister of Agriculture



\_\_\_\_\_  
Presiding Member of the Executive Council

\_\_\_\_\_  
*(This part is for administrative purposes only and is not part of the Order.)*

**Authority under which Order is made:**

Act and section: Agricultural Land Commission Act, S.B.C. 2002, c. 36, s. 58 (2)

Other: OIC 571/2002

R10235503

## SCHEDULE

**1     *Section 2 of the Agricultural Land Reserve Use, Subdivision and Procedure Regulation, B.C. Reg. 171/2002, is amended***

***(a) by repealing subsection (2) (p), and***

***(b) by adding the following subsection:***

(2.5) The lawful production of cannabis is designated as farm use for the purposes of the Act if produced outdoors in a field or inside a structure

(a) that has a base consisting entirely of soil, or

(b) that was, before the date on which this section came into force,

(i) constructed for the purpose of growing crops inside it, including but not limited to the lawful production of cannabis, or

(ii) under construction for the purpose referred to in subparagraph (i), if that construction

(A) was being carried out in accordance with all applicable authorizations and enactments, and

(B) continues without interruption from the date it began to the date the structure is completed, other than work stoppages considered reasonable in the building industry, and

that has not been altered since that date to increase the size of its base or to change the material used as its base.



s.15;s.19 , Legislation

Corporate Governance, Policy and Legislation Branch | Ministry of Agriculture

s.15:s.19



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** FW: QA for MLP-for Friday after 9:30 AM  
**Date:** Thursday, July 26, 2018 12:11:20 PM  
**Attachments:** LEGISLATION'S REVIEW Q and A MLP Cannabis Reg Change July 2018 FINAL.docx

---

Hi s.15;s.

Please see our collective edits.

Let us know if you need more.

s.15;s.19

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, July 26, 2018 9:13 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** FW: QA for MLP-for Friday after 9:30 AM  
For review of language  
s.15;s.19

Ministry of Agriculture

Ph: s.15;s.19

Please note new phone number.

---

**From:** s.15;s.19 GCPE:EX  
**Sent:** Tuesday, July 24, 2018 4:39 PM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** QA for MLP-for Friday after 9:30 AM  
Here is the late s.15;s.1



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Amendment to ALR USP Reg re: Cannabis Production  
**Date:** Thursday, July 26, 2018 8:59:06 AM

---

s.15;s.19

Thank you for getting in touch. I will set up a call. Expect an invite shortly.

Cheers!

s.15;s.19

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**From:** s.15;s.19 @ubcm.ca]  
**Sent:** Wednesday, July 25, 2018 4:48 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19  
**Subject:** Re: Amendment to ALR USP Reg re: Cannabis Production  
Hi s.15;s.1

s.15;s.19 is tied up in meetings all week, but I'm available for a call tomorrow or Friday. Let me know what works, my schedule is fairly open.

Thanks,

s.15;s.19

Union of British Columbia Municipalities (UBCM)

s.15;s.19

Web | [www.ubcm.ca](http://www.ubcm.ca)

Twitter | [www.twitter.com/ubcm](https://twitter.com/ubcm)

---

**From:** s.15;s.19 @gov.bc.ca>  
**Date:** Friday, July 20, 2018 at 11:41 AM  
**To:** s.15;s.19 @ubcm.ca>s.15;s.19 @bcm.ca>  
**Cc:** s.15;s.19 @gov.bc.ca>s.15;s.19 AGRI:EX"  
s.15;s.19 @gov.bc.ca>s.15;s.19 AGRI:EX" <s.15;s.19> @gov.bc.ca>s.15;s.19  
AGRI:EX" <s.15;s.19 @gov.bc.ca>  
**Subject:** RE: Amendment to ALR USP Reg re: Cannabis Production  
Hi s.15;s.19

Sorry for the delay in reaching out to you. We would be happy to discuss the issue with you. Are you available for a call later next week?

s.15;s.19

Corporate Governance, Policy and Legislation Branch | Ministry of Agriculture

s.15;s.19

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, July 20, 2018 2:26 AM  
**To:** s.15;s.19  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Amendment to ALR USP Reg re: Cannabis Production  
Hi s.15;s.19 - so sorry for the delay on this.

We'd be happy to do a call with you on the OIC. This would be led by someone from AGRI's

Legislation team; they will be in touch with you about a day/time next week. I hope this works for you.

Thanks,

s.15;s.19

---

**From:** s.15;s.19 [mailto:s.15;s.19@ubcm.ca]  
**Sent:** Tuesday, July 17, 2018 12:31 PM  
**To:** s.15;s.19; EX;s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19  
**Subject:** Amendment to ALR USP Reg re: Cannabis Production  
H/s.15;s.19

UBCM staff have been reviewing the OIC since the news release came out on Friday in regards to production of cannabis on the ALR. We would like to ensure that we are interpreting the OIC correctly and are hoping you would be available for a short call this week to discuss.

I am available for a call between 2:00 and 4:30 tomorrow, or anytime after 1:00 pm on Thursday.

Thanks,

s.15;s.19

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s.15;s.19

Union of BC Municipalities

s.15;s.19

Please note, my office hours are Monday-Thursday only

*The Compass: Weekly News and Information from UBCM – subscribe for free at [www.ubcm.ca](http://www.ubcm.ca)*

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Amendment to ALR USP Reg re: Cannabis Production  
**Date:** Friday, July 20, 2018 11:41:29 AM

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Hi s.15;s.19

Sorry for the delay in reaching out to you. We would be happy to discuss the issue with you. Are you available for a call later next week?

s.15;s.19

s.15;s.19

Corporate Governance, Policy and Legislation Branch | Ministry of Agriculture

s.15;s.19

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, July 20, 2018 2:26 AM  
**To:** s.15;s.19  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Amendment to ALR USP Reg re: Cannabis Production

Hi s.15;s.19 - so sorry for the delay on this.

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Thanks,

s.15;s.19

---

**From:** s.15;s.19 [mailto:s.15;s.19@ubcm.ca]  
**Sent:** Tuesday, July 17, 2018 12:31 PM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19  
**Subject:** Amendment to ALR USP Reg re: Cannabis Production

Hi s.15;s.19

UBCM staff have been reviewing the OIC since the news release came out on Friday in regards to production of cannabis on the ALR. We would like to ensure that we are interpreting the OIC correctly and are hoping you would be available for a short call this week to discuss.

I am available for a call between 2:00 and 4:30 tomorrow, or anytime after 1:00 pm on Thursday.

Thanks,

s.15;s.1

--

s.15;s.19

Union of BC Municipalities

s.15;s.19

Please note, my office hours are Monday-Thursday only

*The Compass: Weekly News and Information from UBCM – subscribe for free at [www.ubcm.ca](http://www.ubcm.ca)*

**From:** s.15;s.19 AGRI:EX  
**To:** s.22  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** RE: Inquiry respecting amendments to the Agricultural Land Reserve Use, Subdivision and Procedure Regulation  
**Date:** Wednesday, July 18, 2018 10:09:20 AM  
**Attachments:** image001.jpg

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It was my pleasure to assist in answering your question. Thank you for reaching out to find the answers you were looking for.

s.22

Best,

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
PO Box 9120 Stn Prov Gov, Victoria BC V3G 2M3

s.15;s.19

Agri Logo



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**From:** s.22

**Sent:** Wednesday, July 18, 2018 8:57 AM

**To:** s.15;s.19 AGRI:EX

**Cc:** s.15;s.19 AGRI:EX

**Subject:** Re: Inquiry respecting amendments to the Agricultural Land Reserve Use, Subdivision and Procedure Regulation

Thanks for getting back to me so promptly- really appreciate your professionalism.

The OIC answers my question- which related to an existing facility that is currently growing a crop other than Cannabis. The reg is quite clear on that point.

Thanks again.

Sent from my iPhone

On Jul 18, 2018, at 5:45 PM, s.15;s.19 , AGRI:EX s.15;s.19 · wrote:

Good morning s.22

s.22

The OIC is publically available on the BC laws website here:

[http://www.bclaws.ca/civix/document/id/oic/oic\\_cur/0380\\_2018](http://www.bclaws.ca/civix/document/id/oic/oic_cur/0380_2018)

I have also attached a copy of the OIC to this email in case you find that more convenient.

The opening lines of s. 2(1.1) of the Agricultural Land Reserve Use, Subdivision and Procedure Regulation are important to consider when reading s. 2(2.5) (the amendment). I include those below.

2(1.1) The activities designated under this section as farm uses for the purposes of the Act must not be prohibited

- a) by any local government bylaw except a bylaw under section 917 of the *Local Government Act*, or
- b) by a law of the applicable treaty first nation government, if the activity is undertaken on treaty settlement lands.

s.22

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
PO Box 9120 Stn Prov Gov, Victoria BC V3G 2M3

s.15;s.19

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**From:** s.22

**Sent:** Tuesday, July 17, 2018 10:56 PM

**To:** s.15;s.19 .GRI:EX

**Cc:** s.15;s.19 AGRI:EX

**Subject:** Re: Inquiry respecting amendments to the Agricultural Land Reserve Use, Subdivision and Procedure Regulation

Thanks for getting back to me so quickly s.22 - so the time difference makes it hard to chat. Could you kindly email me the exact regulation rather than the press release, so that I can read it. After that - if I still have a question, I will call you.

Sent from my iPhone

On Jul 17, 2018, at 10:25 PM s.15;s.19

wrote:

Good afternoon s.22

Thank you for your inquiry respecting cannabis.

I left you a voice mail moments ago and am happy to discuss your questions over the phone. If you would prefer to have an email discussion, please feel free to respond to this message with any questions you may have related to on the recent (July 13<sup>th</sup>, 2018) BC Government Announcement: *Protecting land in the ALR guides cannabis production regulation* (available at <https://news.gov.bc.ca/releases/2018AGRI0050-001390>).

Kind regards,

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
PO Box 9120 Stn Prov Gov, Victoria BC V3G 2M3

s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** RE: QA for MLP-for Friday after 9:30 AM  
**Date:** Thursday, July 26, 2018 4:55:04 PM

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Thank you, I will review and send forward for comms and Exec to have.

s.15;s.19

Ministry of Agriculture

s.15;s.19

Please note new phone number.

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, July 26, 2018 12:11 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** FW: QA for MLP-for Friday after 9:30 AM

His.15;s.1

Please see our collective edits.

Let us know if you need more.

s.15;s.19

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, July 26, 2018 9:13 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** FW: QA for MLP-for Friday after 9:30 AM

For review of language

s.15;s.19

Ministry of Agriculture

s.15;s.19

Please note new phone number.

---

**From:** s.15;s.19 GCPE:EX  
**Sent:** Tuesday, July 24, 2018 4:39 PM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** QA for MLP-for Friday after 9:30 AM  
Here is the latest s.15;s.



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Withheld pursuant to/removed as

s.12; s.13

**AGENDA**  
**Deputy Ministers Working Group**  
**Cannabis**

**Wednesday, October 18<sup>th</sup>**

**7:30am – 8:30am**

**1-877-353-9184 Participant Conference ID,**s.15;s.17

s.13

## Implementation of Cannabis Regulations-Working Group Meeting

### Meeting Minutes

<b>Date</b>		May 30, 2017	
<b>Time</b>		10:00-11:30 pm	
<b>Meeting Participants</b>		Meeting Chair:s.15;s.19	
		Participantss.15;s.19 s.15;s.19	
		Regretss.15;s.19	
<b>Agenda Items</b>		<b>Notes</b>	<b>Action</b>
1)	Agenda approval (1 min)	<i>Intended outcome: agreed upon agenda or additional items are added</i>	Approved

s.12;s.13

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s.12; s.13

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s.13; s.12

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Withheld pursuant to/removed as

s.12; s.13



8)	Next Meeting (1 min)	<i>Intended outcome: Timing and content for next meeting is suggested.</i>  s.15:s. states will be reviewing today's discussion notes with management and formulating work plan for working group.	s.15:s. <b>to create AGRI Cannabis working group workplan</b>  s.15:s. <b>to type and distribute meeting minutes to working group</b>  s.15;s.1 <b>to send out next meeting invite and agenda</b>
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s.12; s.14

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s.12; s.13; s.14

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s.14

## Proposed Amendments to the *Agricultural Land Commission Act*

Ministry of Agriculture

May 2018



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s.13; s.12



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Withheld pursuant to/removed as

s.12; s.13

# CANNABIS IMPLEMENTATION PLANNING DOCUMENT

This document will be used to identify, collect and organize required resources for the successful implementation of cannabis legalizing the regulation within the Ministry of Agriculture. This information may be used to inform more detailed work plans and future authorizations.

*Ministry of  
Agriculture 2017-  
2018*

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s.12; s.13

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s.13; s.12

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s.12; s.13

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s.12; s.14



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s.12; s.13

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Withheld pursuant to/removed as

s.12; s.14

Page 107 of 182 to/à Page 111 of 182

Withheld pursuant to/removed as

s.12; s.13; s.14

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Withheld pursuant to/removed as

s.12; s.13

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Withheld pursuant to/removed as

s.13; s.12

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Withheld pursuant to/removed as

s.12; s.13



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s.12; s.13; s.14

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s.13; s.12; s.14

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Withheld pursuant to/removed as

s.12; s.13; s.14

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Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 MAH:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 MAH:EX s.15;s.19 MAH:EX  
**Subject:** ALCA reg amendments  
**Date:** Thursday, June 28, 2018 13:29:43

---

His.15;s.19

We're trying to clarify some information for our ADM regarding s.13

s.13

. Are you free at all this afternoon for a call?

s.15;s.19

Local Government Division

Ministry of Municipal Affairs and Housing

s.15;s.19

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Withheld pursuant to/removed as

s.12; s.13; s.14

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Withheld pursuant to/removed as

s.14



**From:** s.15;s.19 GRI:EX  
**To:** AGRI:EX  
**Subject:** Cannabis Implementation Planning Document  
**Date:** Tuesday, August 1, 2017 13:35:48  
**Attachments:** Planning Document – 2017 2018 Cannabis Legalization and Regulation Project TEMPLATE.docx

---

Hi s.15;s.

As discussed I have attached the document for you to fill out. Please try to get this back to me in approximately two weeks.

When you return it please let me know if any changes need to be made to the instructions of the form to make it more user friendly.

Thanks, s.15;s.

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15;s.19

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Withheld pursuant to/removed as

s.14

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Withheld pursuant to/removed as

s.12; s.14

Page 009 of 193

Withheld pursuant to/removed as

s.14; s.12

**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX  
**Cc:** AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** cannabis update  
**Date:** Wednesday, November 15, 2017 11:04:35

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s.15;s.

Had a quick call with s.15;s.19 from Cannabis Secretariat.

She identified the three cab subs have been approved by cabinet:

s.12;s.13

s.15;s.1  
s.13

Let me know if any questions. Also if anyone has anything to add from call, please feel free.

s.15;s.19

Corporate Governance, Policy and Legislation

Ministry of Agriculture

s.15;s.19

**From:** s.15;s.19 [iRI:EX](#)  
**To:** [AGRI:EX](#)  
**Cc:** s.15;s.19 [AGRI:EX;s.15;s.19](#) [AGRI:EX](#)  
**Subject:** Comments on Federal Regs under Cannabis Act  
**Date:** Thursday, December 7, 2017 17:37:20  
**Attachments:** [image001.jpg](#)

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Dear s.15;s.

As promised, I provide my comments and thoughts respecting the *Proposed Approach to the Regulation of Cannabis* consultation document released by health Canada outlining the regulations proposed under the Cannabis Act.

s.13

s.13

comments.

Thank you!

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15;s.19

s.15;s.19

Agri Logo



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19  
s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Data Monitoring suggested indicators  
**Date:** Wednesday, November 8, 2017 12:01:13  
**Attachments:** Copy of Indicator Framework - Oct 17 2017 (EN) (2).xlsx

---

Hi All

I have compiled a list ( See below) of additional indicators to suggest to the Feds for Cannabis Data monitoring. For convenience I have reattached the full indicator list.

If you think of anything else to add to this list please let me know in the next couple of hours. This task is due today.

s.13

Thanks, s.15;

s.15;s.19

Ministry of Agriculture I Corporate Governance. Policy and Legislation Branch

s.15;s.19

s.15;s.19



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 CSCD:EX;s.15;s.19 CSCD:EX s.15;s.19 CSCD:EX  
**Cc:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** Economic development  
**Date:** Tuesday, June 27, 2017 16:47:02  
**Attachments:** [image001.jpg](#)  
[Policy Analysis Economic Development final draft May 19.pdf](#)

---

Hi s.15;s. , s.15 and s.15;s.

Thank you again for your time yesterday to talk about areas of common areas of interest related to cannabis between our ministries. It was nice to meet everyone and to put faces to names and files.  
s.13

Should you have any questions about the issues we discussed, please contact myself or s.15;s.  
s.15;s.1 (cc'd), who is AGRI's lead on the file.

Cheers,  
s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15;s.19

Agri Logo



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** Fw: 300FECAE-AB8F-47E0-9716-F43888715A7B  
**Date:** Wednesday, November 1, 2017 06:29:24  
**Attachments:** s.13

---

Sent from my BlackBerry 10 smartphone on the TELUS network.

---

**From** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, November 1, 2017 6:03 AM  
**To:** s.15;s.19 AGRI:EX, s.15;s.19 AGRI:EX  
**Subject:** 300FECAE-AB8F-47E0-9716-F43888715A7B

---

Have you guys seen this memo? Will be discussed during DM Working Group this morning.

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** FW: s.12;s.13  
**Date:** Wednesday, May 9, 2018 09:17:14  
**Attachments:** s.12;s.13

---

My eyes aren't working or these PPT are identical and haven't been changed. I agree with what has been said but I think there needs to be a statement s.12;s.13  
s.12;s.13

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, May 9, 2018 9:05 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: ADMCNR PPT ALCA Proposed Amendments.pptx

This is a great start s.15;s. This deck is locked in with the ADM logo at the top so will follow up with s.15;s.19 to see if there is one that we can use or modify for ELUC.  
s.12;s.13

s.15;s.19

Ministry of Agriculture  
s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, May 9, 2018 8:04 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** RE: s.12;s.13  
A few changes:  
s.12;s.13

I have other thoughts – maybe we can find time to convene between 9 and 10

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, May 8, 2018 10:12 PM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** s.12;s.13  
**Importance:** High

Please see attached first draft of new format for ADM CNR. Very short. Note the max number of slides is 10; 10 mins allowed for presentation + 10 mins for questions. Please direct – thanks,

Page 017 of 193

Withheld pursuant to/removed as

s.12; s.14

-----Original Appointment-----

Draft Agenda  
s.13

**From:** s.15;s.19 [RI:EX](#)  
**To:** [AGRI:EX](#)  
**Subject:** FW: ALR | FN authoriy  
**Date:** Friday, June 15, 2018 11:08:38

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, June 15, 2018 9:14 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** FW: ALR | FN authoriy  
FYI

s.15;s.19  
Ministry of Agriculture

s.15;s.19

---

**From:** s.15;s.19 IRR:EX  
**Sent:** Friday, June 15, 2018 8:56 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 IRR:EX  
**Cc:** AGRI:EX; GRI:EX  
**Subject:** RE: ALR | FN authoriy

Where ALR lands are on TSL, the ALC Act applies and prevails over FN laws. Sliammon and Tsawwassen both have ALR on their TSL.

s.15;s.1  
~

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, June 14, 2018 4:33 PM  
**To:** s.15;s.19 IRR:EX  
**Cc:** AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 IRR:EX  
**Subject:** Re: ALR | FN authoriy

Thanks, s.15;s.1 - that really helps. So I assume this is a provincial policy for TSL. I'll check in with s.15 for more details. And I know s.15; is speaking to you separately about cannabis, so I'll stay out of the conversation!

s.1, can you confirm if 'ALR stays on TSL' is a provincial policy, and if there is any treaty - or which treaties - have a variance from that? Really appreciate your help.

Take care,

s.15;s.

Sent from my iPhone

On Jun 14, 2018, at 2:07 PM, s.15;s.19 IRR:EX; s.15;s.19 wrote:

Hi s.15;s. -

It's been a while since our paths crossed. Good to hear from you.

I confirmed with some ALR folks who I ran into today. There is ALR on TSL. And apparently prov/fed law prevails.

s.15;s.19 is the person for all treaty lands stuff - he's probably the person you want to talk to.

I'm still with s.15; shop - been providing some support to the Secretariat on Cannabis with their FN engagement.

Regards,

s.15;s.1

Sent from my iPhone

On Jun 14, 2018, at 9:34 AM, s.15;s.19  
wrote:

AGRI:EX s.15;s.19

Sorry,s.15;s.1 - I need to have a separate conversation with you, my question was not related to cannabis production in the ALR. It's about the existence of ALR in treaty settlement lands in BC, so I'll have a different conversation with you.

Sorry for any confusion to you and s.15;s.1  
s.15;s.  
Sent from my iPhone

On Jun 13, 2018, at 11:19 PM,s.15;s.19  
s.15;s.19 wrote:

AGRI:EX

His.15;s.1 - hope you're well. The one treaty that apparently has ALR is Tsawwassen, but it would be great to have you confirm any overriding authority if TFN has that, not sure what that might look like. Thanks for your help with this!  
s.15;s.  
Sent from my iPhone

On Jun 13, 2018, at 6:55 PM, s.15;s.19  
s.15;s.19 wrote:

IRR:EX

Thanks s.15;. Sounds good.  
I'll also confirm here at MIRR whether there's any ALR that falls on treaty settlement land.  
I'm in Vancouver a couple days – will give you a call when I'm back in the office.  
Cheers,  
s.15;s.1

---

**From:**s.15;s.19 AGRI:EX  
**Sent:** Tuesday, June 12, 2018 2:28 PM  
**To:**s.15;s.19 IRR:EX  
**Cc:** AGRI:EX s.15;s.19  
**Subject:** RE: ALR | FN authoriy  
His.15;s.1

I've had a few preliminary discussions with my colleagues here at AGRI, but I wonder if it might be more helpful to schedule a discussion between some of the staff here at AGRI and a few staff from MIRR to discuss this further?  
Thanks,s.15;s

---

**From:**s.15;s.19 IRR:EX  
**Sent:** Tuesday, June 12, 2018 11:29 AM

**To:** s.15;s.19 AGRI:EX

**Subject:** ALR | FN authoriy

Hi s.15; –

Just wanted to ask you about one of the points

I think I heard you make

s.13;s.16

Regards,

s.15;s.19

Major Projects & Cross Government Initiatives

Branch

Ministry of Indigenous Relations and

Reconciliation

Phone: s.15;s.19



Page 022 of 193 to/à Page 023 of 193

Withheld pursuant to/removed as

s.12; s.14

Page 024 of 193

Withheld pursuant to/removed as

s.14

Page 025 of 193 to/à Page 026 of 193

Withheld pursuant to/removed as

s.12; s.13

Page 027 of 193 to/à Page 028 of 193

Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** FW: e 12-e 13  
**Date:** Friday, June 8, 2018 07:43:46  
**Attachments:** image001.jpg

---

fyi

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, June 7, 2018 4:40 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX;s.15;s.19  
AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** Re:s.12;s.13

s.15 - s.1 and I spoke about this and confirmed the proposed approach.

Thanks for this,

Sent from my iPhone

On Jun 7, 2018, at 12:19 PM, s.15;s.19 AGRI:EX s.15;s.19 wrote:

s.15; as discussed, below is the proposed approach s.12;s.13;s.14  
s.12;s.13;s.14

Thank you.

s.15;s.19

Ministry of Agriculture

s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, June 5, 2018 10:54 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** s.12;s.13

Hi s.15;s.

Further to the conversation s.15;s.19 and I just had with you, I write to confirm  
direction for the s.12;s.13

s.12;s.13

Please confirm that this is acceptable at your earliest convenience.

Thank you for your guidance and leadership!

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15;s.19

s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** FW: Cannabis Kelowna city council  
**Date:** Wednesday, July 25, 2018 10:19:08

---

FYI

s.15;s.19

Ministry of Agriculture

Ph: s.15;s.19

Please note new phone number.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, July 25, 2018 10:13 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Cannabis Kelowna city council

Just received this from a Kelowna city councillor that works in my branch:

"My understanding is Kelowna is waiting to hear what the federal position will be. At this point staff has recommended we do not allow cannabis production ( bunker style) on ALR land. The MMR permit holders can have concrete structures in industrial zones. I believe there are six commercial producers who have been approved in the city. My understanding is council just accepted the report. but I have asked the city manager for clarification."

**From:** s.15;s.19 AGRI:EX  
**To:** RI:EX  
**Subject:** FW: Cannabis  
**Date:** Monday, May 14, 2018 14:40:43

---

-----Original Message-----

From: s.15;s.19 AGRI:EX  
Sent: Thursday, May 10, 2018 5:54 PM  
To: s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
Subject: Cannabis

s.13

Thanks so much for everyone's work on this. A+

Sent from my iPhone



Page 033 of 193 to/à Page 034 of 193

Withheld pursuant to/removed as

s.12; s.13

**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** FW: Documents for our July 24 meeting  
**Date:** Monday, July 23, 2018 12:10:16  
**Attachments:** s.12;s.13

**Importance:** High

---

Hi s.15;s. and s.15;  
s.12;s.13;s.14

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, July 23, 2018 10:51 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Documents for our July 24 meeting

Thanks, s.15;s. Here are the documents for tomorrow's meeting with the ALC, s.1 confirmed she's happy to share in advance. s.13

Thanks,  
s.15;s.1

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, July 23, 2018 9:17 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** RE: Documents for our July 24 meeting

Hi s.15;s.  
s.13

I have also included a draft meeting

s.13

Hope this helps.

s.15;s.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Sunday, July 22, 2018 10:18 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Re: Documents for our July 24 meeting

Sorry - I couldn't get into my work account all weekend - argh - finally guessed my password had expired!

I haven't yet heard from s.1 about sending the docs out. On Friday she talked about walking them into the meeting - if the meeting was going ahead - then suddenly put them on a SharePoint site we have with ALC. I'll send hers as soon as I hear from her that I can. Can s.15 share hers in advance?

Thanks,

s.15;s.1

Sent from my iPhone

On Jul 22, 2018, at 9:24 AM, s.15;s.19 AGRI:EX <s.15;s.19> wrote:

s.15;s.1 the docs aren't attached?

Sent from my BlackBerry 10 smartphone on the TELUS network.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Saturday, July 21, 2018 4:25 AM  
**To:** s.15;s.19, AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Fwd: Documents for our July 24 meeting  
Hi s.15;s. - FYI and as we discussed. Can we send s.15;s.13 questions in advance for ALC info? Please let me know.  
s.12;s.13

Thanks,  
s.15;s.1

Begin forwarded message:

**From:** s.15;s.19 AGRI:EX" s.15;s.19  
**Date:** July 21, 2018 at 4:01:55 AM PDT  
**To:** 's.15;s.19 ALC:EX" s.15;s.19  
**Cc:** s.15;s.19 ALC:EX's.15;s.19  
s.15;s.19 AGRI:EX"s.15;s.19  
AGRI:EX"s.15;s.19

**Subject: Re: Documents for our July 24 meeting**

Hi s.1 - thanks for sharing the documents. Can you confirm if we can distribute these internally in advance, for information, or does ALC want to walk these in? I will confirm with s.15;s. if we can send her team's s.13 questions to ALC in advance for information.  
I am confirming we're good to go with a working meeting next Tues which will include you and s.15;s. for ALC, and members of AGRI policy and legislation teams.  
I discussed the priority focus of the meeting with s.15;s., which is as you, me and s.15;s. had briefly discussed: s.13  
s.13

I will re-send the invite with a meeting objective and agenda. Thanks for fitting us into your very tight schedule, and for sharing some of ALC's work and expertise in these areas.  
Take care,  
s.15;s.

On Jul 20, 2018, at 4:19 PM, s.15;s.19 wrote:

**From:** s.15;s.19 U:EX  
**To:** AGRI:EX  
**Subject:** FW: Follow up from meeting today  
**Date:** Wednesday, July 25, 2018 08:41:09

---

Just about to delete this one, but wanted to ask if you want me to respond before I do or perhaps include this question/topic for our internal meeting agenda?

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, July 20, 2018 3:30 PM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 ALC:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19  
s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Follow up from meeting today

s.15;s.1 I responded to your query in the earlier email to s.15;s. We should all touch base next week for further clarity.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, July 20, 2018 3:20 PM  
**To:** s.15;s.19 ALC:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19  
AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Follow up from meeting today

Yes, thank you s.15, this has certainly provided some food for thought.

s.12;s.13

explanation of this would certainly help given that we are the ones having to explain this to local government staff, and they are already asking.

Thanks,

s.15;s.

s.15;s.19

s.15;s.19

Strengthening Farming Program

BC Ministry of Agriculture

s.15;s.19

s.15;s.19

**Ministry Mission:** World leading stewardship of land, farm and food systems for the health and prosperity of British Columbians

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**From:** s.15;s.19 ALC:EX  
**Sent:** Friday, July 20, 2018 3:10 PM  
**To:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** RE: Follow up from meeting today

Hi s.15;

Likewise, thanks for the productive and informative meeting on Wednesday. With respect to your email below, s.13  
s.13

Food for thought I suppose.

Cheers and have a nice weekend,

s.15;s.19

British Columbia Ministry of Agriculture

Ph. s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, July 18, 2018 4:05 PM  
**To:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19  
AGRI:EX;s.15;s.19 ALC:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** Follow up from meeting today

Hi all –

Thanks for the fruitful meeting today! It was very helpful to float this 3-stream approach and hear your thoughts about it. Apologies for our overly enthusiastic use of air time here in the Victoria office. I hope those of you who called in did get at least an acceptable opportunity to voice your views. Please do follow up if you didn't.

s.13

Thanks again for all your thoughts and expertise today everyone! The meeting was very helpful ☺

Best,

s.15;

-----Original Appointment-----

**From:** s.15;s.19 \AGRI:EX

**Sent:** Tuesday, July 17, 2018 5:02 PM

**To:** s.15;s.19 AGRI:EX s.15;s.19 \AGRI:EX; s.15;s.19 AGRI:EX s.15;s.19

AGRI:EX

**Subject:** Residential uses on the ALR -

**When:** Wednesday, July 18, 2018 2:00 PM-2:30 PM (UTC-08:00) Pacific Time (US & Canada).

**Where:** 3rd floor big boardroom

<< File: Residences and zones July 17 2018.docx >>

**As promised the attached word document provides the background.**

Hi s.15;s. and s.15;s.,

s.13

s.15;s. and s.15;s. please

invite one or two of your staff who are familiar with this topic. According to the calendar it looks like s.15;s. and s.15; would be available for this meeting.

I will follow up with a short summary of the issue later today.

s.13

I have booked the room until 3 but I hope to be done within a ½ hour.



**From:** s.15;s.19 | AGRI:EX  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX;  
s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Cc:** AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** FW: Follow Up  
**Date:** Monday, July 16, 2018 16:55:27  
**Attachments:** [Assessment Act S23 Classification of land as a farm.docx](#)  
[Classification of land as Farm 2018.docx](#)  
[Land Values Reg.docx](#)  
[image001.jpg](#)

---

Hi everyone,

Please see attached for some of the follow up information from our meeting with s.15;s.19

s.15;s. last Wednesday.

Thanks,

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15;s.19

s.15;s.19

Agri Logo



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**From:** s.15;s.19 AGRI:EX

**Sent:** Thursday, July 12, 2018 4:13 PM

**To:** s.15;s.19 AGRI:EX

**Cc:** AGRI:EX

**Subject:** FW: Follow Up

s.15;s.19, can I please ask you to distribute the information from s.15;s.19 from the meeting yesterday?

Thanks

s.15;s.19

Ministry of Agriculture

Ph: s.15;s.19

Please note new phone number.

---

**From:** s.15;s.19 | MAH:EX

**Sent:** Thursday, July 12, 2018 3:58 PM

**To:** s.15;s.19 AGRI:EX

**Cc:** s.15;s.19 AGRI:EX

**Subject:** Follow Up

s.15; I am not sure who all in your staff/ministry would find this info useful, so please share. If there are any further questions or I missed anything, please call me.

s.15;s.19

Ministry of Municipal Affairs and Housing

s.15;s.19

Tel: s.15;s.19 Mobile: s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** GRI:EX  
**Subject:** FW: GCTRGP letters  
**Date:** Tuesday, June 5, 2018 10:49:05  
**Attachments:** Sold converted during production year.docx  
D.I.Ane readings.docx  
CHP co-gen.docx  
Surrendered deferred revoked.docx  
Partial Eligible.docx  
Sold.docx  
**Importance:** High

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, June 4, 2018 5:20 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** FW: GCTRGP letters  
**Importance:** High

Hi s.15;s.

With respect to the Greenhouse Carbon Tax Rebate Grant program letters we have followed advice received and made reference to why we are questioning the submitted information. This means that we are sending out 6 different letters to individual companies. The final letters are below. If you could take a quick look it would be appreciated. We need to get them out this week. We will ensure that all recipients have a two week turnaround to provide information.

Regards

s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, June 4, 2018 4:49 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** GCTRGP letters

Good afternoon s.15,

Attached for your review is the letters to be sent to 2018 Applicants.

1. D.I.Ane Readings \$526,112

- Houwelings

2. Combined Heat and Power engine (CHP or co-gen) (estimated ineligible fuel) \$90,000

- Glenwood Valley

3. Surrendered/revoked/deferred production \$736,637

- BJ's greenhouse
- Rosedale
- Sunselect
- Sunselect Delta
- Sunnyside produce Delta

4. Partial eligibility \$194,350

- Village Farms

5. Sold \$21,400

- Bridgeview
- Techni-gro

6. Sold/convert during production year

---

s.15;s.19

Ph:s.15;s.19 s.15;s.19  
e-mail.

Ministry of Agriculture

 Please consider the environment before printing this

**From:** s.15;s.19 RI:EX  
**To:** AGRI:EX  
**Subject:** FW: Highlights for impacts on LGs  
**Date:** Friday, July 28, 2017 16:52:23

---

FYI

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, July 28, 2017 2:37 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** FW: Highlights for impacts on LGs

Hi s.15;

s.15; asked for a few bulleted points that he could give to s.15;s. re: impacts to local government ability to prohibit Cannabis production on the ALR.

I have provided a very high-level summary below. There may be need for follow –up so just wanted to keep you in the loop.

s.15;s

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, July 28, 2017 2:33 PM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Highlights for impacts on LGs

Hi s.15;

As discussed, here are the highlights of next steps related to the potential impacts on Local Government decision making with regards to Cannabis production on ALR.

s.13

s.14

s.13

s.14

Let me know if you require further clarification. I am happy to come talk to s.15;s. if needed. Nobody is in denial of the complexity of the issues being discussed.

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15;s.19

s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** FW: JTT Analysis s.13  
**Date:** Friday, May 18, 2018 12:46:38  
**Attachments:** Fact Sheet on ALR Greenhouses and Cannabis.docx  
ATT00001.htm

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, May 18, 2018 12:21 PM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19, AGRI:EX  
**Subject:** Fwd: JTT Analysis s.13  
Sharing information with you from JTT or s.13  
s.13

Sent from my iPhone

Begin forwarded message:

**From:** s.15;s.19 JTT:EX" s.15;s.19  
**Date:** May 18, 2018 at 11:22:26 AM PDT  
**To:** "s.15;s.19 AGRI:EX" s.15;s.19  
s.15;s.19  
**Cc:** s.15;s.19 JTT:EX" s.15;s.19  
**Subject:** JTT Analysis s.13

s.15; and s.15;

Nice to finally meet you both in person yesterday.

In the spirit of collaboration and transparency, I wanted to share some data and analysis JTT has compiled s.13

s.13

Thanks,  
s.15;s.19

s.15;s.19

Ministry of Jobs, Trade and Technology  
Phone: s.15;s.19  
Cell: s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Fwd:s.22  
**Date:** Tuesday, June 26, 2018 08:59:57

---

s.15;s.19 My understanding is that the ALRUSPR states that LG's cannot prohibit medical marijuana currently, however, we have not ability to enforce with LG's and they have been starting to make their own decisions even though contrary to the current Reg.

Can you please ask for an opinion from s.1 or s.15;s. (if she is back) at what point would a build be considered a grandfather? If they have a building permit but have not started construction? If they have started construction?

Thanks

s.15;s.19

Ministry of Agriculture

Ph: s.15;s.19

PLEASE NOTE NEW PHONE NUMBER

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, June 26, 2018 8:25 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Fwd:s.22

Can you check how this will work against our grandfathered clause? So licensed but not fully approved?

Sent from my iPhone

Begin forwarded message:

**From:** s.15;s.19 AGRI:EX"s.15;s.19  
**Date:** June 26, 2018 at 8:17:45 AM PDT  
**To:** s.15;s.19 AGRI:EX"s.15;s.19  
**Cc:** s.15;s.19 AGRI:EX"s.15;s.19 , AGRI:EX"s.15;s.19 , AGRI:EX"s.15;s.19  
s.15;s.19 AGRI:EX" s.15;s.19 @gov.bc.ca>  
**Subject:** RE:s.22

Mornings.s.15

We are aware of this one and it is a problem. s.22 has met all the requirements for a medical marijuana operation on ALR land. Under existing rules a community cannot ban a medical marijuana operation as it is a designated farm use. She has also met all of the local bylaw requirements of the city of Kelowna. Kelowna has refused to issue her a permit and is now looking to change their bylaws. I will check with s.15;s. and s.15; re: additional detail but my recollection is that the only recourse that may be available is going to court.

Regards

s.15;

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, June 25, 2018 6:22 PM

**To:** s.15;s.19 AGRI:EX  
**Subject:** Fwd s.22

Do we know about this one s.15? Memory lapsing.

s.15;s.19 Agriculture

Begin forwarded message:

**From:** s.15;s.19 AGRI:EX" s.15;s.19  
**Date:** June 25, 2018 at 4:34:21 PM PDT  
**To:** s.15;s.19 AGRI:EX" s.15;s.19  
s.15;s.19 AGRI:EX" s.15;s.19 @gov.bc.ca>  
**Subject:** RE s.22

s.15;

So this sounds like an issue with the current rules for medical marihuana. Under the previous government we made licensed medical cannabis a designated farm use and then s.15;s.1 i's team developed ministerial guidelines for what the province would consider reasonable restrictions on those facilities. At the time s.15;s.19 stated publicly that the province would not accept local government's varying from those guidelines (i.e. attempts to prohibit production) but some local governments continued on this path in any case.

As you mentioned, our proposed approach would increase the flexibility of local governments in this area.

I've cc-ed s.1 in case he has anything to add

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, June 25, 2018 3:48 PM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** FW: s.22  
s.15;s.19

What am I missing here? Given it's a medical marijuana facility, isn't this at the current point a designated farm use (i.e. local governments cannot restrict or prohibit). Will be a different story shortly though.

s.15;s.1  
n

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** June 25, 2018 3:42 PM  
**To:** s.15;s.19 AGRI:EX s.15;s.19  
**Subject:** s.22

Hi s.15.  
s.22

is a farmer who is unhappy with the City of Kelowna regarding her application to grow cannabis on her farm on ALR land. She has spoken with AGRI Staff (call response attached) but is unhappy that as

she has a licence from Health Canada and the City of Kelowna will not process her application until their Council approved new rules regarding this issue.

She would like to speak with you to as she is frustrated and wonders why we don't have the power to make the city comply with the provincial regulations.

She has called previously but your schedule has been very busy so thought this way you may be able to fit it in if you have a few minutes.

s.15;s.19

s.15;s.19

Deputy Minister of the Ministry of Agriculture

s.15;s.19      s.15;s.19



Page 050 of 193 to/à Page 058 of 193

Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 [AGRI:EX](#)  
**To:** s.15;s.19 [AGRI:EX](#)  
**Cc:** s.15;s.19 [AGRI:EX](#)  
**Subject:** FW: Production on Agricultural Land Reserve Summary  
**Date:** Tuesday, June 20, 2017 11:31:24  
**Attachments:** [Production on Agricultural Land Reserve.docx](#)

---

Hi s.15;

Here is the original email request from s.15;s. I think we should probably try to get this back to them by Wednesday at the latest :/

s.15;s. would you mind giving a quick read through of the attached doc to see if we should have our solicitor review it? I don't think there is a need to but I'd like to get your opinion.

Thanks, s.15:

---

**From:** s.15;s.19 [PSSG:EX](#)  
**Sent:** Friday, June 16, 2017 3:21 PM  
**To:** s.15;s.19 [GRI:EX](#)  
**Cc:** s.15;s.19 [PSSG:EX](#)  
**Subject:** Production on Agricultural Land Reserve Summary

Hi s.15;s.

As mentioned over the phone, s.15; has drafted a summary of the Options Paper on Agricultural Land Reserve for inclusion in the body of the document. Could you please review the summary and provide your feedback? s.15;s has highlighted some questions for your attention. Also, was your solicitor involved in the drafting of your paper? If they were, we may want to get them involved in the review of the summary.

Thank you for your review and feedback.

s.15;s.1

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Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** FW: QA for MLP-for Friday after 9:30 AM  
**Date:** Thursday, July 26, 2018 12:11:20  
**Attachments:** s.12;s.13;s.19

---

Hi s.15;

Please see our collective edits.

Let us know if you need more.

s.15;s

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, July 26, 2018 9:13 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** FW: QA for MLP-for Friday after 9:30 AM  
For review of language

s.15;s.19

Ministry of Agriculture

Ph: s.15;s.19

Please note new phone number.

---

**From:** s.15;s.19 GCPE:EX  
**Sent:** Tuesday, July 24, 2018 4:39 PM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** QA for MLP-for Friday after 9:30 AM  
Here is the latest s.15;s.1

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 PREM:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** FW: questions regarding forthcoming OICs  
**Date:** Friday, June 15, 2018 15:09:24  
**Attachments:** Log 2355 ALCA cannabis & Tag.pdf

---

Hi s.15;s.

We just got the tagged order and s.15;s. will load to SharePoint.  
s.14

~~to premier cabinet operations for cannabis processing.~~

I am ccing s.15;s.19 the lead policy analyst on cannabis here and she will respond to your second question.

s.15;s.

---

**From:** s.15;s.19 PREM:EX  
**Sent:** Friday, June 15, 2018 2:52 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 PREM:EX  
**Subject:** FW: questions regarding forthcoming OICs  
Hi s.15; just checking in on the status of the tagged OIC.  
s.13

Thanks  
s.15;s.19

---

**From:** s.15;s.19 PREM:EX  
**Sent:** Tuesday, June 12, 2018 11:29 AM  
**To:** s.15;s.19 < AGRI:EX  
**Subject:** RE: questions regarding forthcoming OICs  
Hello,  
s.13

s.15;s.19

-----  
Cabinet Operations  
s.15;s.19

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**From:** s.15;s.19 < AGRI:EX  
**Sent:** Tuesday, June 12, 2018 11:06 AM  
**To:** s.15;s.19 PREM:EX  
**Subject:** questions regarding forthcoming OICs  
Hi s.15;

I have posted a draft OIC package to Cab Ops sharepoint. There may be some adjustments to the

Cabinet Summary Information document that I can upload tomorrow morning – is that ok?  
Secondly, we have another OIC that we hope goes to Cabinet July 4. We do not yet have a tagged order.  
Can I post the draft tagged order as part of the OIC pkg to Sharepoint? Any guidance is much appreciated.  
Thank you!

Regards,

s.15;s.19

Corporate Governance, Policy & Legislation Branch  
Ministry of Agriculture

s.15;s.19

Page 064 of 193 to/à Page 071 of 193

Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 <[redacted]@AGRI:EX>  
**To:** s.15;s.19 <[redacted]@AGRI:EX> s.15;s.19 <[redacted]@AGRI:EX>  
**Subject:** Fw: speaking pointes and Q's and A's on cannabis reg  
**Date:** Wednesday, June 13, 2018 11:30:23  
**Attachments:** RE ALR FN authoriy.msg

---

Sent from my BlackBerry 10 smartphone on the TELUS network.

---

**From:** s.15;s.19 <[redacted]@AGRI:EX>  
**Sent:** Wednesday, June 13, 2018 11:21 AM  
**To:** s.15;s.19 <[redacted]@AGRI:EX>  
**Cc:** s.15;s.19 <[redacted]@AGRI:EX>  
**Subject:** speaking pointes and Q's and A's on cannabis reg

---

s.15;s.

Can you please develop speaking points and Q's and A's for the cannabis OIC package please s.13  
s.13

s.15;s s.13

Thanks

s.15:

s.15;s.19

s.15;s.19 Corporate Governance and Policy Branch  
Ministry of Agriculture

Ph: s.15;s.19

Email: s.15;s.19



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** FW: Summary of Legal Opinions on Cannabis  
**Date:** Tuesday, February 20, 2018 14:34:01  
**Attachments:** [Legal Opinion Summary Notes for Briefing with s.15.docx](#)  
[image001.jpg](#)

---

s.15;s. attached is a summary of all the legal opinions that we have pursued with counsel.

s.15;  
s.15;s.19

Ministry of Agriculture

s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, February 20, 2018 2:01 PM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Summary of Legal Opinions on Cannabis  
Hi s.15;

s.15;summarized the numerous legal opinions we have received.  
s.15;s

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, February 20, 2018 12:14 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Apologies, caught a typo  
Here is the corrected version of my summary. Sorry about that typo!

s.15;s.19

s.15;s.19  
Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15;s.19



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Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Subject:** FW: Timing of Cannabis Cab Subs  
**Date:** Tuesday, May 8, 2018 11:33:11  
**Attachments:** s.12;s.13

---

s.15;s. I deleted a page worth.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, May 8, 2018 8:42 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** FW: Timing of Cannabis Cab Subs

Had to restart my computer. Here it is. If you can see if you can reduce the length.

s.15;s.19

Ministry of Agriculture

s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, May 7, 2018 9:09 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Timing of Cannabis Cab Subs

s.15;s.1 the first dn on cannabis on the ALR is attached. I only received end of day so only had a couple of hours to review by the time I sat down for the evening to review and revise. Options echo the ppt attached (for reference).

Still needs a cliff number and I have asked s.1 to generate for each note. A bit longer than I would have liked it, but wanted to send to you tonight so you have time to review before it goes further.

s.13

s.15;s.19

Ministry of Agriculture

s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, May 7, 2018 1:53 PM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Timing of Cannabis Cab Subs

s.15;s.

10

Heads up that the cannabis secretariat is signalling that our Minister may in fact be scheduled to meet with s.15;s.19 on May 10<sup>th</sup> (at our meeting with DMs' it looked like it would be later on)

The Secretariat sent us some decision note templates that they want us to follow which will be sent to me today along with an updated version of the powerpoint we used already (to account for some late-breaking legal comments we received).

If we are on for the 10<sup>th</sup>, deadline for approved documents would be noon on the 9<sup>th</sup>. You should have the updated package tomorrow morning (the 8<sup>th</sup>)

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, May 7, 2018 12:29 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** FW: DRAFT Cannabis Cab Subs

FYI –s.15;s.19 is working to get drafts to me by end of day on the DN's.  
s.15;s.19

Ministry of Agriculture  
s.15;s.19

---

**From:** s.15;s.19 PSSG:EX  
**Sent:** Monday, May 7, 2018 12:27 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** RE: DRAFT Cannabis Cab Subs

Just a heads up that the minister meeting may be scheduled for May 10<sup>th</sup> - I'm awaiting confirmation.

Approved materials will be required by noon on the 9<sup>th</sup> at latest.  
I will advise once I receive confirmation.

s.15;s.19

---

**From:** s.15;s.19 R PSSG:EX  
**Sent:** Friday, May 4, 2018 1:21 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** RE: DRAFT Cannabis Cab Subs  
H s.15;s.19

I'm sure you are aware that at the DMs meeting next steps were discussed. The DSG's office is working on scheduling a meeting with s.15;s.19 For that meeting a decision note will be required for the two issues Agri will be seeking direction on. I believe s.15: had previously shared the template we had been using with you however if you need any assistance with the note, please let me know.

I don't have a timeline for the meeting but I would expect it will be scheduled for the first available opportunity that we can get the minister's together.

Give me a call if you have any questions....

s.15;s.1

^  
**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, April 23, 2018 4:48 PM  
**To:** s.15;s.19 PSSG:EX  
**Cc:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** DRAFT Cannabis Cab Subs  
Hi s.15;s

I have attached for you Draft Cab subs for AGRI issues.

Please do not advance these DRAFT cab subs as they have not yet been approved by our DM. I have updated the cab sub options to reflect the most recent recommended changes from my ADM.

I have been directed to send these DRAFT cab subs to you so that a date for their review can be set. Once our DM has reviewed further revisions will be made to the documents prior to distribution.

Please contact me if you have any questions.

Thanks s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, April 23, 2018 4:32 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Cannabis Cab Subs Revised  
Hi s.15;s.

I've attached the revised Cannabis Cab Subs and slide deck for your review.  
**s.15;s.19**

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
**s.15;s.19**

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 CSCD:EX s.15;s.19 CSCD:EX  
**Cc:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** FW: UBCM - cannabis  
**Date:** Wednesday, September 6, 2017 13:19:46  
**Attachments:** image001.jpg

---

Hi s.15;s. and s 15;s 19 ..

I noticed the following in the UBCM resolution book, pg 48:

**Farm Assessment – Medical Cannabis Grow Operations**

Approached the Province to discuss the issue that local government could lose property tax revenues if medical marijuana grow operations could qualify for farm classification, and confirmed that federally licensed medical marijuana grow operations will be excluded from the list of agricultural uses which qualify for farm classification for assessment and property tax purposes.

[http://www.ubcm.ca/assets/About~Us/Annual~Reports/2010-2019/2017\\_UBCM\\_Annual\\_Report\\_Resolutions\\_Book.pdf](http://www.ubcm.ca/assets/About~Us/Annual~Reports/2010-2019/2017_UBCM_Annual_Report_Resolutions_Book.pdf)

I wonder if you are aware of this discussion and whether senior government direction was provided on the issue of farm classification? Happy to set up a call to discuss further, if that would be easier.

Cheers,

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
PO Box 9120 Stn Prov Gov, Victoria BC V3G 2M3

s 15;s 19

Agri Logo



**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX  
**Cc:** AGRI:EX; s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** FW: UBCM Convention 2018: Session Proposal APPROVED  
**Date:** Thursday, July 19, 2018 22:35:02

---

Hi s.15;s. – FYI, and a heads-up that we'll need to identify all AGRI presenters for this clinic session. s.15;s will lead, but we did discuss SF participating, too. Can you let me know who from your group would be part of the presentation? Also, should one of the RAs also participate? We may only need one or two presenters, but it would be great to have a well-rounded team to support Qs and As, etc. Please give me your views on this.

We had also talked about ALC being part of this presentation. We will need to confirm with s.15;s, s.15; and s.15;

Thanks,  
s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, July 19, 2018 10:29 PM  
**To:** s.22  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: UBCM Convention 2018: Session Proposal APPROVED  
Hi s.15; – thanks for confirming our session proposal has been selected for this year's UBCM Convention. We look forward to presenting to local government participants.  
I'll prepare and provide the details you require by your deadline of July 27.  
Thanks again – take care,

s.15;s.19

s.15;s.19  
Corporate Governance, Policy & Legislation Branch  
BC Ministry of Agriculture

s.15;s.19

s.15;s.19  
s.15;s.19

---

**From:** s.22  
**Sent:** Thursday, July 19, 2018 10:14 PM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** UBCM Convention 2018: Session Proposal APPROVED  
**Importance:** High

Dear s.15;s.

I am pleased to inform you that your session proposal, *Cannabis Production on Agricultural Land Reserve*, has been selected by the UBCM Convention Committee for presentation at the 2018 UBCM Convention. I have been assigned as your UBCM contact person for this session and can answer your questions moving forward. As a reminder, this year's Convention will be taking place at the Whistler Conference Centre from September 10th – 14th. You can find general information on the Convention here:

<http://www.ubcm.ca/EN/main/convention/2018-convention-information.html>

You have been allocated a clinic session on September 12, 2018 from 7:30 am – 8:15 am.

At this time, we are asking that you **confirm your session title, description and presenter list**. Below is the information that was submitted in your proposal:

**TITLE: Cannabis Production on Agricultural Land Reserve**

- Would you prefer to write “Cannabis Production on the Agricultural Land Reserve” ?

**SESSION DESCRIPTION: This session will provide an update on the new cannabis federal and the proposed provincial regulatory framework with a focus on cannabis production on the Agricultural Land Reserve as it relates to local governance interests, tools and approaches.**

- Would you like to update this description based on the recent provincial announcement?
- Perhaps consider adding a bit more information (maximum length of a clinic description is 100 words).

**PRESENTERS:s.15;s.19**

- Please confirm that you will be the only presenter?
- If there are other presenters, please ensure their contact information is provided, including email address.

For each presenter, we require their name, position title, organization they are representing, their email address, and whether or not they will be using a powerpoint presentation. Presenters will be contacted directly by FMAV, our audio visual provider, with information on uploading their presentation to our presentation management system.

This information must be received by **Friday, July 27th**. If this information is not confirmed by the deadline, UBCM reserves the right to cancel your session.

Additional information will be sent out shortly regarding how to submit multimedia presentations, via our online upload system. Presentations must be submitted by **Friday, August 31st**.

If you have any questions, please feel free to contact me directly.

Sincerely,

s.22

Policy Analyst | Community Safety  
Union of British Columbia Municipalities (UBCM)  
60-10551 Shellbridge Way, Richmond, BC V6X 2W9

s.22

Web | [www.ubcm.ca](http://www.ubcm.ca)

Twitter | [www.twitter.com/ubcm](https://www.twitter.com/ubcm)



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Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 AGRI:EX  
**To:** s.22  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Inquiry respecting amendments to the Agricultural Land Reserve Use, Subdivision and Procedure Regulation  
**Date:** Tuesday, July 17, 2018 13:25:19  
**Attachments:** image001.jpg

---

Good afternoon<sup>s.22</sup>

Thank you for your inquiry respecting cannabis.

I left you a voice mail moments ago and am happy to discuss your questions over the phone. If you would prefer to have an email discussion, please feel free to respond to this message with any questions you may have related to on the recent (July 13<sup>th</sup>, 2018) BC Government Announcement: *Protecting land in the ALR guides cannabis production regulation* (available at <https://news.gov.bc.ca/releases/2018AGRI0050-001390>).

Kind regards,

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15;s.19

Agri Logo



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 GCPE:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** RE: AGRI Media Request: Cannabis in the ALR  
**Date:** Friday, July 20, 2018 13:53:57

---

Please see my edits below. I hope they help.

---

**From:** s.15;s.19 : GCPE:EX  
**Sent:** Friday, July 20, 2018 12:02 PM  
**To:** s.15;s.19, AGRI:EX;s.15;s.19 , AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** FW: AGRI Media Request: Cannabis in the ALR

Hi, we're putting together some background info for s.15;s.19 Tyee interview on Cannabis in the ALR, can you please look over the below and let me know of edits or suggestions. The third bullet in the first question is added in, should he be asked why it is being treated differently. Hoping to provide to PSSG asap please.

1. What are the current farming practices on ALR land - and do they follow the same restrictions as cannabis?

- Farming of land, plants and animals is a farm use on the ALR. Cannabis is a plant and its farming is a farm use on the ALR.
- There are some methods of farming on the ALR that local governments cannot prohibit and some that they can prohibit as outlined in the regulations.
- ~~The restrictions apply to the production of cannabis only, and not to other livestock or crops.~~
- For example, the construction, maintenance and operation of farm buildings for use in an intensive livestock operation or for mushroom production are designated farm uses under the Regulation (see s. 2(2)(o)(ii)) and as such, they cannot be prohibited by local governments.
- For cannabis, its production in open fields, soil based structures, and grandfathered structures cannot be prohibited by local governments. This means that local governments can prohibit the construction of new non-soil based structures for cannabis production as long as these structures were not under construction as of July 13, 2018.
- In response to concerns expressed by local governments, The B.C. government is providing them with the authority to decide whether new construction of non-soil based structures for cannabis production should occur on ALR land within their boundaries. ~~treating cannabis differently than other crops and commodities as it's legal status is in the process of transition.~~

2. Why are cement-based greenhouses called "bunkers" when they involve cannabis?

- Many of the facilities used currently to produce medical marijuana on the ALR resemble bunkers. The term reflects the thick cement-walled and-floored construction methods used to meet the federal licensing requirements and support the security of the operation.

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Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 PREM:EX  
**Cc:** s.15;s.19 PREM:EX  
**Subject:** RE: ALR Cannabis Reg OIC  
**Date:** Thursday, July 12, 2018 11:44:33

---

That would be great thank you. Communications will hold off releasing announcement until they receive word that the OIC has been deposited.

s.15;s.19

---

**From:** s.15;s.19 PREM:EX  
**Sent:** Thursday, July 12, 2018 11:13 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 PREM:EX  
**Subject:** RE: ALR Cannabis Reg OIC

Hello,

We can try, it might be closer to 9:30.

s.15;s.19

Cabinet Operations

s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, July 12, 2018 11:12 AM  
**To:** s.15;s.19 PREM:EX  
**Cc:** s.15;s.19 PREM:EX  
**Subject:** ALR Cannabis Reg OIC  
**Importance:** High

Hi s.15;s.

s.13

s.15;s.19

---

**From:** s.15;s.19 GCPE:EX  
**Sent:** Thursday, July 12, 2018 11:02 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19, s.15;s.19 GCPE:EX; s.15;s.19 AGRI:EX  
**Subject:** FINAL IB-Cannabis Regs tomorrow at 9 AM-need confirmation that OIC will be published  
**Importance:** High

Hi there, attached is the final IB for tomorrow on the cannabis on ALR regulatory change.

Can you please confirm that the OIC will be deposited by then? I don't want the release out without the OIC published.

The time we currently have for release is 9 AM.

Thanks!

s.15;s.19

s.15;s.19

Ministry of Agriculture

Government Communications and Public Engagement

s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.22  
**Cc:** s.22 s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19  
**Subject:** RE: Amendment to ALR USP Reg re: Cannabis Production  
**Date:** Thursday, July 26, 2018 08:59:06

---

s.22

Thank you for getting in touch. I will set up a call. Expect an invite shortly.  
Cheers!

s.15;s.1

---

**From:** s.22  
**Sent:** Wednesday, July 25, 2018 4:48 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.22 s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19  
s.15;s.19 AGRI:EX

**Subject:** Re: Amendment to ALR USP Reg re: Cannabis Production

Hi s.15;s.

s.15;s. is tied up in meetings all week, but I'm available for a call tomorrow or Friday. Let me know what works, my schedule is fairly open.

Thanks,  
s.22

Policy Analyst | Community Safety  
Union of British Columbia Municipalities (UBCM)  
60-10551 Shellbridge Wav, Richmond, BC V6X 2W9

s.22

Web | [www.ubcm.ca](http://www.ubcm.ca)  
Twitter | [www.twitter.com/ubcm](https://www.twitter.com/ubcm)

---

**From:** s.15;s.19 AGRI:EX;s.15;s.19 <[@gov.bc.ca](mailto:@gov.bc.ca)>

**Date:** Friday, July 20, 2018 at 11:41 AM

**To:** s.22

**Cc:** s.15;s.19 AGRI:EX" s.15;s.19 <[@gov.bc.ca](mailto:@gov.bc.ca)>, s.15;s.19 AGRI:EX"  
s.15;s.19 <[@gov.bc.ca](mailto:@gov.bc.ca)>, s.15;s.19 AGRI:EX" s.15;s.19 <[@gov.bc.ca](mailto:@gov.bc.ca)>  
AGRI:EX" s.15;s.19 <[@gov.bc.ca](mailto:@gov.bc.ca)>

**Subject:** RE: Amendment to ALR USP Reg re: Cannabis Production

Hi s.22

Sorry for the delay in reaching out to you. We would be happy to discuss the issue with you. Are you available for a call later next week?

s.15;s.19

Corporate Governance, Policy and Legislation Branch | Ministry of Agriculture

s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, July 20, 2018 2:26 AM  
**To:** s.22  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Amendment to ALR USP Reg re: Cannabis Production

Hi s.22 - so sorry for the delay on this.

We'd be happy to do a call with you on the OIC. This would be led by someone from AGRI's

Legislation team; they will be in touch with you about a day/time next week. I hope this works for you.

Thanks,

s.15;s.1

---

**From:** s.22  
**Sent:** Tuesday, July 17, 2018 12:31 PM  
**To:** s.15;s.19 \GRI:EX;s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19  
**Subject:** Amendment to ALR USP Reg re: Cannabis Production  
HI s.15;s. and s.15.

UBCM staff have been reviewing the OIC since the news release came out on Friday in regards to production of cannabis on the ALR. We would like to ensure that we are interpreting the OIC correctly and are hoping you would be available for a short call this week to discuss.

I am available for a call between 2:00 and 4:30 tomorrow, or anytime after 1:00 pm on Thursday.

Thanks,

s.22

Manager, Local Government Program Services  
Union of BC Municipalities

s.22

Please note, my office hours are Monday-Thursday only

*The Compass: Weekly News and Information from UBCM – subscribe for free at [www.ubcm.ca](http://www.ubcm.ca)*

**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Cab Sub Production Draft 3  
**Date:** Friday, November 3, 2017 10:09:42

---

I would suggest to s.15;s.19 was also going to raise our concerns up to s.15;s.19 so your reinforcement would be beneficial. Apologies should have indicated that in previous email that s.15;s.19 was going to share our concerns.  
s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, November 3, 2017 10:05 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** Re: Cab Sub Production Draft 3  
So where do I direct that - is it me reaching out to s.15;s.19 or should I contact s.15;s.19

Sent from my iPhone

On Nov 3, 2017, at 12:24 PM, s.15;s.19 AGRI:EX s.15;s.19 <[s.15;s.19@gov.bc.ca](mailto:s.15;s.19@gov.bc.ca)> wrote:

s.15;s.19 this feedback was provided in our verbal discussions with s.15;s.19 and was not accepted as she indicated that the direction was to keep the cab sub tight. I think at this point, it is at your table or review that will need to push those two key messages.

s.15;s.19

-----Original Message-----

**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, November 3, 2017 8:30 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Cab Sub Production Draft 3

I agree that the topic of the cab sub doesn't seem to be critical, but having said that, given the scope I'm a bit more agreeable about the fact that our issues are not covered.

s.12;s.13

-----Original Message-----

**From:** s.15;s.19 AGRI:EX



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Withheld pursuant to/removed as

s.12; s.13

From: s.15;s.19 PSSG:EX  
Sent: Wednesday, November 1, 2017 10:55 AM  
To: s.15;s.19 AGRI:EX s.15;s.19 JAG:EX  
Cc: s.15;s.19 AGRI:EX  
Subject: Cab Sub Production Draft 3

**s.14**

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** RE: Caller  
**Date:** Monday, June 4, 2018 09:46:56

---

Hi, I don't have the answers to these questions. s.15;s.19 will know more about the messaging on these issues.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, June 4, 2018 9:40 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** FW: Caller  
**Importance:** High

Hi s.15 and s.15,

Regarding the correspondence questions below, I am unable to answer any of them. This item was due June 1<sup>st</sup> but I was on flex so require a response today.

s.15, please direct how to respond to the following question:

1. Why has Minister recused herself and why has this not been made public.

s.15;s.15. Please direct how to respond to the following question:

1. Why has there been no response to the public who has requested a moratorium on cannabis on ALR.

s.15;s.15, please direct how to respond to the following question:

1. Of the 2,300 responses Minister received from the ALRRC, what number of those are responses just from the survey results and how many responses are from those providing signatures against cannabis on ALR.

Thanks, s.15;s.15.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, May 31, 2018 11:25 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** FW: Caller  
Hi s.15;s.15.

Please send to ASP in eApprovals for a telephone response.

Thanks,

s.15

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, May 30, 2018 11:54 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Re: Caller  
s.15 or s.15;s.15

On May 30, 2018, at 11:10 AM, s.15;s.19 AGRI:EX s.15;s.19 <[redacted]@gov.bc.ca> wrote:

Hi s.15;s.19

Would you suggest that I send this to s.15;s.15 for response?

Thanks,

s.15:

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, May 30, 2018 10:45 AM

**To:**s.15;s.19 AGRI:EX

**Subject:** Caller

His.15;

I have had a lady by the name of s.22 who has called and written in a few times, (cliff 187671) and her call today included a few questions I am hoping s.15 is able to respond to? If not please advise if political staff should speak with her.

1. Why has there been no response to the public who has requested a moratorium on cannabis on ALR.
2. Why has Minister recused herself and why has this not been made public.
3. Of the 2,300 responses Minister received from the ALRRC, what number of those are responses just from the survey results and how many responses are from those providing signatures against cannabis on ALR.

Her # is s.22

Cheers,

s.15;s.

s.15;s.19

s.15;s.19

Minister of Agriculture

s.15;s.19

Page 097 of 193 to/à Page 108 of 193

Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 GCPE:EX  
**To:** s.15;s.19 AGRI:EX  
**Subject:** RE: Cannabis in the ALC Regulation  
**Date:** Wednesday, July 25, 2018 10:05:24

---

great, thank you

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, July 25, 2018 10:05 AM  
**To:** s.15;s.19 GCPE:EX  
**Subject:** RE: Cannabis in the ALC Regulation

Sorry, I spoke to him this morning. We needed to have a meeting with ALC and I needed direction before proceeding.

---

**From:** s.15;s.19 GCPE:EX  
**Sent:** Wednesday, July 25, 2018 10:04 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** FW: Cannabis in the ALC Regulation

Hi s.15, can you please call Dave in the next hour, even if we don't have all the answers, I think it is important the ministry acknowledges his requests for help and concerns. He has called me daily since Friday and heard nothing back from AGRI, including a call from earlier this morning. If you were able to take his questions and then look into the answers I think he'd appreciate it. He is beginning, and understandably so, to be frustrated by no AGRI response other than from the guy on the press release.

---

**From:** Dave Batten [mailto:daveb@krahn.com]  
**Sent:** Wednesday, July 25, 2018 8:25 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 GCPE:EX  
**Subject:** FW: Cannabis in the ALC Regulation  
Good morning s.15;s.1

I left a voice message for you a few minutes ago on your land line. I am in Edmonton right now and have some time this morning to speak with you if your schedule permits. I have to leave my office at 11:00 am. BC time so hopefully we can engage in a brief telephone conversation before that time. Please use my cell at **1-778-808-5420** to make contact with me.

Thanks for your assistance in this matter.

Regards,

**Dave Batten**

Sr. Director of Development

**Abbotsford Office Vancouver Office Edmonton Office Kelowna Office**

#400-34077 Gladys Ave #210-1311 Kootenay Street Suite1000, 10117 Jasper Ave #7 – 3304 Appaloosa Rd  
Abbotsford, BC V2S 2E8 Vancouver, BC V5K 4Y3 Edmonton, AB T5J 1W8 Kelowna, BC, V1V 2W5

T (604) 853-8831 ext. 139 T (604) 294-6662 T (780) 758-2002 C (778) 808-5420

C (778) 808-5420 C (778) 808-5420 C (778) 808-5420

F (604) 853-1580 F (604) 853-1580 F (604) 853-1580

E [daveb@krahn.com](mailto:daveb@krahn.com)

[www.krahn.com](http://www.krahn.com)

---

**From:** Dave Batten  
**Sent:** Tuesday, July 24, 2018 12:11 PM  
**To:** s.15;s.19 @gov.bc.ca  
**Subject:** FW: Cannabis in the ALC Regulation

Good morning s.15;s.1

Please see below, the email trail with s.15;s.19 regarding the Cannabis interpretation, etc. I will try to get in touch with you this afternoon.

Thanks and Best Regards,

**Dave Batten**

Sr. Director of Development

Abbotsford Office Vancouver Office Edmonton Office Kelowna Office

#400-34077 Gladys Ave #210-1311 Kootenay Street Suite1000, 10117 Jasper Ave #7 – 3304 Appaloosa Rd  
Abbotsford, BC V2S 2E8 Vancouver, BC V5K 4Y3 Edmonton, AB T5J 1W8 Kelowna, BC, V1V 2W5

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C (778) 808-5420 C (778) 808-5420 C (778) 808-5420

F (604) 853-1580 F (604) 853-1580 F (604) 853-1580

E [daveb@krahn.com](mailto:daveb@krahn.com)

[www.krahn.com](http://www.krahn.com)

---

**From:** Dave Batten

**Sent:** Tuesday, July 24, 2018 12:04 PM

**To:** s.15;s.19 GCPE:EX'

**Cc:** 'DAVE KRAHN ([davek@krahn.com](mailto:davek@krahn.com))'

**Subject:** RE: Cannabis in the ALC Regulation

His.15;s.1

Thank you for your email below. I will call s.15;s. later today.

Please see the attached email that I received this morning from Darren Braun, the Director of Planning at the City of Abbotsford. This is the email I was referring to during our telephone conversation about an hour ago. I will discuss same with s.15;s. when we talk later today but I also welcome your comments back on said email.

Thanks Again and Best Regards,

**Dave Batten**

Sr. Director of Development

Abbotsford Office Vancouver Office Edmonton Office Kelowna Office

#400-34077 Gladys Ave #210-1311 Kootenay Street Suite1000, 10117 Jasper Ave #7 – 3304 Appaloosa Rd  
Abbotsford, BC V2S 2E8 Vancouver, BC V5K 4Y3 Edmonton, AB T5J 1W8 Kelowna, BC, V1V 2W5

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C (778) 808-5420 C (778) 808-5420 C (778) 808-5420

F (604) 853-1580 F (604) 853-1580 F (604) 853-1580

E [daveb@krahn.com](mailto:daveb@krahn.com)

[www.krahn.com](http://www.krahn.com)

---

**From:** s.15;s.19 GCPE:EX [<mailto:s.15;s.19@gov.bc.ca>]

**Sent:** Tuesday, July 24, 2018 11:38 AM

**To:** Dave Batten

**Cc:**

**Subject:** RE: Cannabis in the ALC Regulation

Thanks for your patience Dave,

s.15;s.19 may be the best person to begin your questions with, though please bear in mind, depending on the topics, there may be some topics she refers to colleagues with more expertise in the production side of farming, as opposed to her speciality, the legislation.

s.22

s.15;s. can be reached at s.15;s.19 – and if you prefer to schedule a time for your call in advance, I've included her on this note as well.

---

**From:** Dave Batten [<mailto:daveb@krahn.com>]

**Sent:** Monday, July 23, 2018 9:01 AM

**To:** s.15;s.19 GCPE:EX

**Subject:** RE: Cannabis in the ALC Regulation

Good morning s.15;s. .

I trust you had a good weekend.

I was just wondering if you would feel comfortable in providing me with a contact/name and phone number of a Policy representative from the Ministry that I could speak with. We are ready for submission of a number of Cannabis applications this week and are somewhat at a loss as the Municipalities have varying interpretations of the July 13-2018 notice that came from the Ministry.

Thank You and Best Regards,

**Dave Batten**

Sr. Director of Development

Abbotsford Office Vancouver Office Edmonton Office Kelowna Office

#400-34077 Gladys Ave #210-1311 Kootenay Street Suite1000, 10117 Jasper Ave #7 – 3304 Appaloosa Rd  
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C (778) 808-5420 C (778) 808-5420 C (778) 808-5420

F (604) 853-1580 F (604) 853-1580 F (604) 853-1580

E [daveb@krahn.com](mailto:daveb@krahn.com)

[www.krahn.com](http://www.krahn.com)

---

**From:** s.15;s.19 GCPE:EX [mailto:[s.15;s.19@gov.bc.ca](mailto:s.15;s.19@gov.bc.ca)]

**Sent:** Friday, July 20, 2018 10:15 AM

**To:** Dave Batten

**Subject:** Cannabis in the ALC Regulation

Thanks for the call Dave, I've attached a copy of the regulation which, despite its brevity, I hope provides a bit more context. I'll pass your name and number along to our policy branch shortly and they should be in touch today or early next week at the latest.

s.15;s.19

Government Communications and Public Engagement

Ministry of Agriculture

s.15;s.19



**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** RE: Cannabis OIC speaking notes  
**Date:** Wednesday, June 20, 2018 10:57:26  
**Attachments:** Speaking Notes DRAFT 4 - ALRUSPR Cannabis Amendment.docx

---

H;s.15;s.

As requested, I have modified the Speaking Notes to reflect s.15;s.1 feedback. Please let me know how else I can assist.

Thank you,

s.15;s.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, June 19, 2018 7:25 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** Re: Cannabis OIC speaking notes  
Length was to address a minister who is speaking on behalf. will have the background info moved to the end for context in case needed. Easy to shorten.

Sent from my iPhone

On Jun 19, 2018, at 6:01 PM, s.15;s.19 AGRI:EX <s.15;s.19 gov.bc.ca> wrote:

This is too long.

This is for s.15;s.19 on behalf of s.15;s.19 on behalf of s.15;s.19  
s.15;s.19 so needs to be super-simple. Context is if the Premier asks Minister what it's  
about that he have an elevator pitch. We can have a background section of anything  
we want to keep but want to sav something like:  
s.13

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, June 19, 2018 5:05 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** Cannabis OIC speaking notes  
s.15;s.19

Attached are proposed speaking notes for the Cannabis OIC.  
s.15;s.19

Ministry of Agriculture

Phs.15;s.19

Email:s.15;s.19

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Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** AGRI:EX  
**Subject:** RE:s.13  
**Date:** Friday, May 18, 2018 16:31:54

---

I did and had no concerns.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, May 18, 2018 1:14 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** FWS.13

s.15;s.13

s.15;s.19

Ministry of Agriculture

s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, May 18, 2018 9:47 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** AGRI:EX  
**Subject:** FW:s.13

Hi s.15:

MAH is requesting the review and return of s.13 Do you know where it is at in the review process?

Thanks, s.15;s.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, May 8, 2018 9:23 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** AGRI:EX  
**Subject:** s.13

Hi s.15,

s.13

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: cannabis update  
**Date:** Wednesday, November 15, 2017 11:11:36

---

Thanks s.15;

I did reach out to s.15;s.19 on the need to get on with the AGRI policy issues. My understanding was that he would have an ADM call, but he seemed to indicate that this would happen with the secretariat (ie your level).

Can you let me know if we're not getting traction. I think we need to get to Cabinet soon on this as it will start playing out at the FPT AGRI meetings in the new year.

s.15;s.19

s.15;s.19

*Ministry of Agriculture*

*Phone:* s.15;s.19

*Email:* s.15;s.19

---

**From:** s.15;s.19  
**Sent:** Wednesday, November 15, 2017 11:05 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** cannabis update  
s.15;s.19

Had a quick call with s.15;s.19 from Cannabis Secretariat.

She identified the three cab subs have been approved by cabinet:  
s.12;s.13

I have asked s.15;s.19 to invite AGRI to meeting. She has agreed.

Let me know if any questions. Also if anyone has anything to add from call, please feel free.  
s.15;s.19

Corporate Governance, Policy and Legislation  
Ministry of Agriculture  
s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Subject:** RE: Cannabis  
**Date:** Monday, May 14, 2018 14:41:30

---

Great, that's really helpful.

-----Original Message-----

From: s.15;s.19 AGRI:EX  
Sent: Monday, May 14, 2018 2:41 PM  
To: s.15;s.19 AGRI:EX  
Subject: RE: Cannabis

I just sent you the IM that I have the email. I will reach out to Secretariat to see what this means.

s.15;s.19

Ministry of Agriculture  
s.15;s.19

-----Original Message-----

From: s.15;s.19 AGRI:EX  
Sent: Monday, May 14, 2018 2:41 PM  
To: s.15;s.19 AGRI:EX  
Subject: FW: Cannabis

-----Original Message-----

From: s.15;s.19 AGRI:EX  
Sent: ~~Thursday~~ May 10, 2018 5:54 PM  
To: s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
Subject: Cannabis

s.13

Thanks so much for everyone's work on this. A+

Sent from my iPhone

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 GRI:EX  
**Cc:** AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** Re: Cascadia/ Cannabis  
**Date:** Wednesday, May 16, 2018 06:54:48

---

No, nor were we asked.

Sent from my BlackBerry 10 smartphone on the TELUS network.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, May 16, 2018 6:18 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** Re: Cascadia/ Cannabis

---

Canada not legalized.and yes the ALR does make a unique landscape in BC. US has many states that are legalized so by your response, I would expect not the US or other countries.

Sent from my iPhone

On May 16, 2018, at 6:16 AM, s.15;s.19 AGRI:EX <s.15;s.19@[gov.bc.ca](mailto:s.15;s.19@gov.bc.ca)> wrote:

s.15;s. did a jurisdictional scan to find out what other jurisdictions are doing with regard to cannabis which isn't straightforward because not many have anything akin to the ALR. There is no legislation to scan as it hasn't been legalized yet.

Sent from my BlackBerry 10 smartphone on the TELUS network.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, May 16, 2018 4:58 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Fwd: Cascadia/ Cannabis

---

s.15;s. Was there a jurisdictional scan of legislation completed?

Sent from my iPhone

Begin forwarded message:

**From:** s.15;s.19 AGRI:EX" s.15;s.19@[gov.bc.ca](mailto:s.15;s.19@gov.bc.ca)>  
**Date:** May 15, 2018 at 11:50:34 PM PDT  
**To:** s.15;s.19 AGRI:EX" s.15;s.19@[gov.bc.ca](mailto:s.15;s.19@gov.bc.ca)>  
**Cc:** s.15;s.19 | JTT:EX" s.15;s.19@[gov.bc.ca](mailto:s.15;s.19@gov.bc.ca)>

**Subject: Cascadia/ Cannabis**

Hi s.15;

s.15;s.19 is Putting together an inventory of government wide initiatives considered "Cascadia". We have responded but s.15 is wondering whether there was any cross border work on Cannabis legalization. Am think "no" but wanted to check.

Regards

s.15:



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Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 ALC:EX  
**Subject:** RE: Consultation re:s.12;s.13  
**Date:** Tuesday, July 10, 2018 15:35:09

---

Thanks

---

**From:** s.15;s.19 ALC:EX  
**Sent:** Tuesday, July 10, 2018 3:31 PM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** RE: Consultation re:s.12;s.13

He's actually in a meeting with some Cannabis consortium right now ☺

I'll flag it for him as soon as he is out

s.15;s.19 | Agricultural Land Commission

s.15;s.19

Phone: s.15;s.19 Fax: s.15;s.19 [www.alc.gov.bc.ca](http://www.alc.gov.bc.ca)

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---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, July 10, 2018 3:30 PM  
**To:** s.15;s.19 ALC:EX  
**Subject:** RE: Consultation re:s.12;s.13

His wasn't. I sent him a similar email correcting my error. Have not heard back from him yet.

---

**From:** s.15;s.19 ALC:EX  
**Sent:** Tuesday, July 10, 2018 3:29 PM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** RE: Consultation re:s.12;s.13

His.s.15;s.

No problem – please see the attached signed NDA.

s.13

s.15;s.19 | Agricultural Land Commission

s.15;s.19

Phone: s.15;s.19 Fax: s.15;s.19 [www.alc.gov.bc.ca](http://www.alc.gov.bc.ca)

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---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, July 10, 2018 3:19 PM  
**To:** s.15;s.19 ALC:EX  
**Subject:** RE: Consultation re:s.12;s.13

Hi s.15;s.

I sent the wrong NDA to you. s.12;s.13

I have

made the correction. Please sign and send back to me. My apologies. Ugh!

s.15;s.

---

**From:** s.15;s.19 ALC:EX

**Sent:** Tuesday, July 10, 2018 3:08 PM

**To:** s.15;s.19 AGRI:EX

**Subject:** Consultation re s.12;s.13

Hi s.15;s.

Please find attached my signed agreement for tomorrow's meeting.

If these are all set, can you please forward the meeting invitation to s.15;s. and myself as well – as s.1 can't.

Thanks,

s.15;s.19

Agricultural Land Commission

s.15;s.19

Phone: s.15;s.19 Fax: s.15;s.19 [www.alc.gov.bc.ca](http://www.alc.gov.bc.ca)

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**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** RE: Current cannabis regulation  
**Date:** Wednesday, June 20, 2018 10:08:56

---

I will pop up to chat when I am out of meetings this aft.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, June 20, 2018 9:33 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** RE: Current cannabis regulation

Hi s.15;s.

Can you advise what the issue is? I may want to bring in our solicitor as we have two opinions that may conflict.

s.15;s.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, June 20, 2018 9:31 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Current cannabis regulation

Hi s.15;s.1

s.14

Thanks!

s.15;s.19

Innovation & Adaptation Services Branch  
BC Ministry of Agriculture  
s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Re: Declined: ALRUSP discussion with ALC  
**Date:** Thursday, July 19, 2018 15:07:38

---

Thanks s.15;s.1 I am specifically interested in what information s.15; provided to you. We have a difference in interpretation of the legislation so I need to understand how to address.  
s.15;s

Sent from my iPhone

On Jul 19, 2018, at 2:59 PM, s.15;s.19 AGRI:EX <s.15;s.19 @gov.bc.ca> wrote:

I had a conversation with s.15;s. about this, this morning. I have not passed on any information from s.15 to s.15;s. at this time. I will provide you with more information this evening. I have not intended in anyway to create issues; I actually was intending to support the legislation team better, as they move forward with the ALCA work.

Sent from my iPhone

On Jul 19, 2018, at 2:29 PM, s.15;s.19 AGRI:EX  
s.15;s.19 @gov.bc.ca> wrote:

s.15;s.1 would like to understand what information has been provided from s.15 to you that you passed on. To s.15;s. and her team. It has created some issues that I need to understand so I can manage.  
Thanks.

Begin forwarded message:

**From:** s.15;s.19 AGRI:EX"  
<s.15;s.19 @gov.bc.ca>  
**To:** s.15;s.19 AGRI:EX"  
s.15;s.19 @gov.bc.ca>  
**Cc:** s.15;s.19  
<s.15;s.19 @gov.bc.ca>, 's.15;s.19  
AGRI:EX" <s.15;s.19 @gov.bc.ca>, s.15;s.19  
s.15;s. AGRI:EX" s.15;s.19 @gov.bc.ca>,  
s.15;s.19 AGRI:EX" <s.15;s.19 @gov.bc.ca>  
**Subject:** Declined: ALRUSP discussion with ALC

Hi s.15;s.1

I am instructing my team to decline the meeting until we have an objective and agenda for meeting. I want our

team to be prepared for the ALC, particularly in light of their recent comments as to our capability and do not want to provide an opportunity for further criticism as to our professionalism.

s.15;s.1  
-

**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** RE: Documents for our July 24 meeting  
**Date:** Tuesday, July 24, 2018 09:24:04

---

s.15;s reticence will be a challenge for you and your team to get the answers we require to move forward on the draft.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, July 23, 2018 6:56 PM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Re: Documents for our July 24 meeting  
No kidding, I totally understand.

s.15 will likely load everyone up with lots of detail, as is her style. Let's just keep checking in with each other to ensure it's working. I don't think it needs to be anything close to a fulsome discussion, but it will be good to hear what they have to say. I spoke with s.1 today at the committee meeting in Richmond, she took a look at the questions from s.15 and is a little bit worried because some of what your team is working on are committee recommendations, not ALC recommendations, and she's not exactly sure what to say, but she's glad to be asked and to have a conversation. It's too bad we can't have some kind of direct dialogue with the committee, too, but there it is.

See you tomorrow,  
s.15;s.  
Sent from my iPhone

On Jul 23, 2018, at 3:30 PM, s.15;s.19 AGRI:EX <s.15;s.19@gov.bc.ca> wrote:

s.15;s.1 it is just that I need more certainty about meetings for myself and my team. I am an internal thinker, as are many of my team and we don't process things in an oral setting, which makes "organic" meetings hard to digest. It is best if we are able to prepare ourselves beforehand so we can benefit and provide value in meetings. What feels like idea sharing for some, feels like drinking from a firehose for others.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, July 23, 2018 2:59 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Re: Documents for our July 24 meeting  
Sure! But I don't think it is. You can stick with not wanting to talk s.13;s.16  
s.13;s.16

Also, s.1 is gone for a few weeks soon and she is their key policy/practice lead. Given your tight timing, you may want to utilize the time with her and s.15;s. fully but it's definitely up to you.  
Sent from my iPhone

On Jul 23, 2018, at 2:36 PM, s.15;s.19 AGRI:EX <s.15;s.19@gov.bc.ca> wrote:

We should touch base tomorrow morning before the meeting. The

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Withheld pursuant to/removed as

s.14



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 GCPE:EX s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX s.15;s.19 GCPE:EX s.15;s.19 AGRI:EX  
**Subject:** RE: FINAL IB-Cannabis Regs tomorrow at 9 AM-need confirmation that OIC will be published  
**Date:** Thursday, July 12, 2018 11:33:30

---

Good plan. We will let s.15; know as soon as the OIC office confirms the deposit.

---

**From:** s.15;s.19 GCPE:EX  
**Sent:** Thursday, July 12, 2018 11:33 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 GCPE:EX  
**Subject:** RE: FINAL IB-Cannabis Regs tomorrow at 9 AM-need confirmation that OIC will be published  
Thanks s.15;s.

As discussed, we'll set up a trigger release after 9:30 AM. You just need to let s.1 know when the OIC is out, and he'll let the editors know it's good to go.

Much appreciated,

s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, July 12, 2018 11:19 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 GCPE:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 GCPE:EX  
**Subject:** RE: FINAL IB-Cannabis Regs tomorrow at 9 AM-need confirmation that OIC will be published  
Cab Ops says it will work on it but it can likely be accomplished by 9:30 am tomorrow. If they have any problems, I will loop back.

s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, July 12, 2018 11:08 AM  
**To:** s.15;s.19 GCPE:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 GCPE:EX; s.15;s.19 AGRI:EX  
**Subject:** Re: FINAL IB-Cannabis Regs tomorrow at 9 AM-need confirmation that OIC will be published  
s.15;s.19 indicated cab ops needs one day notice to deposit so if this is for Friday, communication to release for Friday needs to occur by tomorrow.

s.15;s.1 can you please confirm?

Sent from my iPhone

On Jul 12, 2018, at 11:02 AM, s.15;s.19 GCPE:EX s.15;s.19 @gov.bc.ca wrote:

Hi there, attached is the final IB for tomorrow on the cannabis on ALR regulatory change.

Can you please confirm that the OIC will be deposited by then? I don't want the release out without the OIC published.

The time we currently have for release is 9 AM.

Thanks!

s.15;s.19

Ministry of Agriculture  
Government Communications and Public Engagement  
s.15;s.19

**From:** s.15;s.19 GRI:EX  
**To:** s.15;s.19 GRI:EX;s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** RE: Fish and Seafood Regulation  
**Date:** Tuesday, May 29, 2018 10:27:13

---

Hi s.15;s.  
s.13

s.15;s.

---

**From:** s.15;s. AGRI:EX  
**Sent:** Tuesday, May 29, 2018 9:20 AM  
**To:** s.15;s.19  
**Cc:** s.15;s.19  
**Subject:** RE: Fish and Seafood Regulation  
Hi s.15;s.s.13  
s.13

Thanks

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, May 25, 2018 3:04 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** FW: Fish and Seafood Regulation  
Hi s.15;s.  
s.13

Please let me know if you have any comments or questions.  
Thank you and regards,  
s.15;s.19

Corporate Governance, Policy & Legislation Branch  
Ministry of Agriculture  
s.15;s.19

---

**From:** s.15;s.19 PSSG:EX  
**Sent:** Friday, May 11, 2018 2:07 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** RE: Fish and Seafood Regulation  
Hi s.15;s.

We are currently anticipating that cannabis will be legalized by the feds around September but timing is uncertain as we do not know when the federal Bill will receive Royal Assent or come into force (they have announced an 8 to 12 week delay between RA and CiF)  
Assuming a September start. we anticipate our cannabis related regulations being considered by Cabinet in August (even though there is currently no scheduled Cabinet meeting in August)  
If we get anything further on timing, we will let you know.

s.15;s.19

s.15;s.19

Cannabis Legalization and Regulation Secretariat  
Policing and Security Branch  
Ministry of Public Safety and Solicitor General

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, May 11, 2018 12:49 PM  
**To:** s.15;s.19 PSSG:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** RE: Fish and Seafood Regulation

Good afternoon s.15.

I work with s.15;s in the Legislation Unit here at the Ministry of Agriculture.

s.13

Thank you!  
Regards,

s.15;s.1

---

**From:** s.15;s.19 PSSG:EX  
**Sent:** Monday, April 30, 2018 3:42 PM  
**To:** s.15;s.19 AGRI:EX; s.15;s.1 FLNR:EX  
**Cc:** s.15;s.19 PSSG:EX; s.15;s.19 PSSG:EX  
**Subject:** Fish and Seafood Regulation

Hi s.15;s. and s.15;s.

In BC laws the Fish and Seafood Act appears to be assigned to both Agriculture and FLNRORD so I am sending this to both of you.

As you may be aware, the federal government will be legalizing cannabis later this year and the province as introduced cannabis legislation for the provincial regulatory framework.

s.13

## **s.13**

If you have any questions or need additional information, please give me a call  
**s.15;s.19**

Cannabis Legalization and Regulation Secretariat  
Policing and Security Branch  
Ministry of Public Safety and Solicitor General

**From:** s.15;s.19 [AGRI:EX](#)  
**To:** [IGRI:EX](#)  
**Subject:** RE: For Input: Draft Content of Letter and Key Messages Re Cannabis ALR  
**Date:** Thursday, July 26, 2018 09:27:35

You were sent an original meeting invite yesterday morning at 11 am after I spoke with **s.15;s.** about who to include in them meeting. People were asking if you were calling in when the meeting started at 1pm. I sent a further update during the meeting to let folks know I was having phone trouble (my headset just suddenly turned off at 1:27 mid call) so that was the second “invite” that went out. You were invited, yesterday morning. Not sure what to say.

**From:** s.15:s.19 AGRI:EX  
**Sent:** Thursday, July 26, 2018 9:07 AM  
**To:** s.15:s.19 AGRI:EX  
**Subject:** RE: For Input: Draft Content of Letter and Key Messages Re Cannabis ALR

I didn't receive an invite for this meeting until 1:27 when it was done. Maybe you added me in late?  
Had no idea you were meeting.

The language/messaging looks good to me.

s.15;s.1

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, July 25, 2018 3:14 PM  
**To:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;  
s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 ALC:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** For Input: Draft Content of Letter and Key Messages Re Cannabis ALR

Hi Folks,

Further to our call this afternoon, please see draft content for a template letter to LGs (still trying to loop my ED in) and some key messages for your input. Please respond by tomorrow first thing as I am trying to move it along.

Cheers!

s.15;s.

s.13

s.13

s.15;s.19

Corporate Governance, Policy and Legislation Branch | Ministry of Agriculture

s.15;s.19

Page 139 of 193 to/à Page 144 of 193

Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 MAH:EX s.15;s.1 MAH:EX s.15;s.19 MAH:EX s.15;s.19 MAH:EX; s.15;s.19  
s.15;s.19 MAH:EX  
**Cc:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** RE: Meeting to discuss s.13;s.14  
**Date:** Thursday, June 28, 2018 15:23:38  
**Attachments:** RE Revitalization of ALCALR.msg  
Re Revitalization of ALCALR.msg  
s.13;s.14

---

This is different than the question from s.15;s.1 to us today about greenhouses and cement-bottomed structures. If you can check in with s.15;s.19 today on that, she can best answer your questions s.15;s.19;s.22

This bigger meeting is as per earlier emails from s.1 and you. Do you no longer need this meeting between our ministries?

Thanks,

s.15;s.1

---

**From:** s.15;s.19 MAH:EX  
**Sent:** Thursday, June 28, 2018 2:12 PM  
**To:** s.15;s.19 AGRI:EX s.15;s.19 MAH:EX s.15;s.19 MAH:EX; s.15;s.19 MAH:EX; s.15;s.19 MAH:EX  
**Cc:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX s.15;s.19  
s.15;s.1  
**Subject:** RE: Meeting to discuss s.13;s.14  
Hi s.15;s.

We don't need a big meeting. Just a quick phone call will do. We'll connect with s.15;s.1

s.15;

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, June 28, 2018 2:05 AM  
**To:** s.15;s.19 MAH:EX s.15;s.19 MAH:EX s.15;s.19 MAH:EX s.15;s.19 MAH:EX  
**Cc:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX; s.15;s.19  
AGRI:EX  
**Subject:** Meeting to discuss s.13;s.14

Hi MAH colleagues,

I hope this is the full group, but please send this note to others that need to be involved.

Looking to arrange a meeting between AGRI and MAH to further discuss proposed changes to the ALCA, at the request of MAH, in the next few weeks s.22 so I'm asking our policy

team's lead on this legislation project, s.15;s.19 to arrange this meeting within the timeframe you need (it sounded like this may be pressing for MAH).

For AGRI, participants would be s.15;s.1 legislation team, members of our policy team, and members of Strengthening Farming (invite to s.15;s. and she will invite her team members). It's a great opportunity for information sharing, so I believe in the more the merrier as long as legislation is comfortable with this.

Thanks,

s.15;s.



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Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Phone Call - s.22  
**Date:** Wednesday, July 25, 2018 09:35:41

---

Sure just on the phone re cannabis

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, July 25, 2018 9:24 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Phone Call - s.22  
Absolutely. I'm in the office and can discuss at any time.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, July 25, 2018 9:23 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** FW: Phone Call - s.22  
Can we discuss?

---

s.15;s.19  
Ministry of Agriculture  
Ph: s.15;s.19  
Please note new phone number.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, July 25, 2018 9:22 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** Phone Call - s.15;s.19  
Good morning s.15;s.

s.22 has been calling for s.15 to speak about the new Cannabis Amendment. You may already be aware of her concerns. s.22 in Kelowna and has a federal licence to grow cannabis but the City of Kelowna has been opposing her on this issue. The building she was intending to use is 4800 square feet with a concrete floor which was built on top of an existing parking lot on the farm property. With the new Amendment stating that if the crops are produced in a building with a concrete floor is not considered "farm use" she is being told she must now apply for a non-farm use permit. She is very upset and feels like we have given the City of Kelowna fuel to delay her further. As the building was already existing would it be grandfathered in? s.15 suggested she speak with you and we will send an eApproval for this shortly.

s.15;s.19

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Withheld pursuant to/removed as

s.12; s.13

wrote:

I've asked s.15;s.1 to advise when. I think the next opportunity was for a discussion at P&A? s.15;s.1, any insight?

s.15;s.19

---

**From:** s.15;s.19 >PREM:EX  
**Sent:** June 5, 2018 3:40 PM  
**To:** s.15;s.19 >AGRI:EX s.15;s.19 <[s.15;s.19@gov.bc.ca](mailto:s.15;s.19@gov.bc.ca)>  
**Subject:** RE: please remind - when is AGRI's cab sub slated for discussion?  
Sorry – the one s.12;s.13

---

**From:** s.15;s.19 >AGRI:EX  
**Sent:** Tuesday, June 5, 2018 3:28 PM  
**To:** s.15;s.19 >PREM:EX  
**Subject:** Re: please remind - when is AGRI's cab sub slated for discussion?  
Which one s.12;s.13

s.15;s.19

Ministry of Agriculture  
s.15;s.19

\*\*Please note: This email is intended for the addressee(s) only and may contain legally privileged information. Any unauthorized use, disclosure or reproduction is strictly prohibited.\*\*

Sent from my iPhone

On Jun 5, 2018, at 3:25 PM, s.15;s.19 >PREM:EX  
s.15;s.19 <[s.15;s.19@gov.bc.ca](mailto:s.15;s.19@gov.bc.ca)> wrote:

s.15;s.1 - I can't recall the last update – is it coming to Cabinet or PA? And when?  
Many thanks  
s.15;s.19

Office of the Deputy Minister to the Premier  
s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** RE: Project plan for executive approvals s.12;s.13  
**Date:** Tuesday, May 29, 2018 09:40:54

---

I have no problem backing this up. I am firm about these timelines. I actually told s.15 that I needed to started drafting weeks ago.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, May 29, 2018 9:30 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Re: Project plan for executive approvals s.12;s.13

I really appreciate your comments, s.15;s.1 I have a different perspective on the extent of any policy work that has been done, we have just been trying to gather some information at this point.

s.13

Can you please confirm? Thanks so much for your clarity on this.  
Sent from my iPhone

On May 29, 2018, at 9:07 AM, s.15;s.19 AGRI:EX s.15;s.19 <[s.15;s.19@gov.bc.ca](mailto:s.15;s.19@gov.bc.ca)> wrote:

Hope these help.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, May 29, 2018 8:42 AM  
**To:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** Project plan for executive approvals s.12;s.13

Does this make sense, s.15;s.19 ? Is there any other direction we need? We need clear parameters or we won't make the timeframe. I've added in s.15;s.1 required timing. I want to send this to s.1 for her agreement as well as s.15;s.1. We need a plan to stick to.

s.12;s.13

Page 155 of 193 to/à Page 157 of 193

Withheld pursuant to/removed as

s.12; s.13

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Subject:** RE: Proposed Cannabis Facility in Courtenay  
**Date:** Wednesday, July 25, 2018 09:06:10

---

No, I am your manager.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, July 25, 2018 9:06 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** RE: Proposed Cannabis Facility in Courtenay

Great thank you for confirming! s.15;s. had mentioned my name in reference to organizing a call and I wanted to make sure this wasn't some form of assignment I needed to put on my to do list 😊

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, July 25, 2018 9:05 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** RE: Proposed Cannabis Facility in Courtenay  
I'm working on this right now. You don't need to do anything.

---

**From:** s.15;s.1 AGRI:EX  
**Sent:** Wednesday, July 25, 2018 8:25 AM  
**To:** s.15;s.1 AGRI:EX  
**Subject:** RE: Proposed Cannabis Facility in Courtenay  
Hi s.15;s. –

How can I support this? Is there anything you would like me to do related to this?

Thanks!

S.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, July 25, 2018 7:07 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Re: Proposed Cannabis Facility in Courtenay  
Hi s.15;s.1

I am not aware of a mass forwarding of the reg to municipalities. Typically the reg or links to them are included in news releases. They may also be emailed in one to one correspondence.

It is worthy to have an internal call of the path forward. I will loop back with s.15;s. and arrange a call.

s.15;s.

Sent from my BlackBerry 10 smartphone on the TELUS network.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, July 25, 2018 6:53 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** FW: Proposed Cannabis Facility in Courtenay

Please see the question about whether the regulation was sent to LGs directly. s.15;s. can develop messaging/guidance with everyone.

Further to the meeting yesterday, I'm not sure how you want to message internally where we're at on interpretation. Do you want to get back to s.15;s. et al directly once this is decided? I could organize an internal call, or s.15;s. can. We would rely on you for the background/content. I know this is pressing for all these teams at this time.

Thanks,

s.15;s.1

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**From:** s.15;s.19 AGRI:EX

**Sent:** Wednesday, July 25, 2018 6:51 AM

**To:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX

**Cc:** s.15;s.19 LC:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX

**Subject:** RE: Proposed Cannabis Facility in Courtenay

Hi there – there was a decision late yesterday on interpretation. s.15;s.1 was in the meeting as well. I'll forward this email to s.15;s.1 to see if she can convey the decision and also answer the question of whether the regulation or messaging has been prepared/shared with LGs directly.

Once s.15;s.1 is back I'll ask her to begin developing the policy guidance in collaboration with all of you and Legislation, and the ALC. We'll also need it for the UBCM Convention in Sept where there will be a cannabis production morning clinic.

Thanks,

s.15;s.1

---

**From:** s.15;s.19 AGRI:EX

**Sent:** Tuesday, July 24, 2018 1:41 PM

**To:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX

**Cc:** s.15;s.19 ALC:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX

**Subject:** RE: Proposed Cannabis Facility in Courtenay

Hi s.15;s.1

Other than the news release by provincial government, I don't believe there has been any other outreach to LGs on this (unless something went out through UBCM – s.15;s.1 is away but maybe s.15;s.1 can confirm)? Currently, there is some confusion regarding how the regulation is being interpreted so we aren't doing any active outreach to LGs at the moment. This morning s.15;s.1 and I discussed the possibility of maybe developing some policy guidance on the intent of the regulation (once this question is resolved), which we could bring to the attention of LGs, along with the specific regulations.

s.15;s.1

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**From:** s.15;s.19 AGRI:EX

**Sent:** Tuesday, July 24, 2018 11:48 AM

**To:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX

**Cc:** s.15;s.19 ALC:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX

**Subject:** RE: Proposed Cannabis Facility in Courtenay

Good Morning: Here is an article on the proposed cannabis facility in the City of Courtenay in the Comox Valley Record today. A question I have is has the new BC cannabis "Protecting land in the ALR guides cannabis production regulation" been sent to local governments? A statement in the attached article from the City of Courtenay, Director of Development, Ian Buck says "Because it's in the ALR we're not permitted to restrict them in the ALR" Not exactly the case anymore. Hopefully they are aware of their new authority to prohibit projects like the one proposed?

<https://www.comoxvalleyrecord.com/business/cannabis-facility-planned-in-courtenay/>

s.15;s.19

s.15;s.19



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 RI:EX s.15;s.19 AGRI:EX  
**Subject:** RE: QA for MLP-for Friday after 9:30 AM  
**Date:** Thursday, July 26, 2018 09:53:02

---

s.15;s.  
s.13

s.15;s.19

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, July 26, 2018 9:13 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 \AGRI:EX  
**Subject:** FW: QA for MLP-for Friday after 9:30 AM  
For review of language

s.15;s.19  
Ministry of Agriculture

s.15;s.19  
Please note new phone number.

---

**From:** s.15;s.19 SCPE:EX  
**Sent:** Tuesday, July 24, 2018 4:39 PM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** QA for MLP-for Friday after 9:30 AM  
Here is the latest s.15;s.1

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 GCPE:EX; s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Questions- Cannabis in the ALC  
**Date:** Tuesday, July 17, 2018 10:30:43

---

s.15;s.19 thank you for having s.15;s.19 take the lead.

s.15;s.19 is also available to call as well as there are a few to call back. I briefly spoke with s.15;s.19 about the inquiries, a couple seemed to be the interpretation of the reg, and others are about construction information.

s.15;s.19

Ministry of Agriculture

s.15;s.19

Please note new phone number.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, July 17, 2018 9:20 AM  
**To:** s.15;s.19 GCPE:EX; s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Questions- Cannabis in the ALC  
On our end I have asked s.15;s.19 to be the point person/coordinator for the inquiries.

Regards

s.15;s.19

19

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**From:** s.15;s.19 GCPE:EX  
**Sent:** July 16, 2018 9:44 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Questions- Cannabis in the ALC  
Hi s.15;s.19

Please direct media calls, if any, to me,

I have been taking names and numbers of industry and members of the public I've been receiving, and sharing them with s.15;s.19 or direction to the appropriate staff person for response. I've attached a copy of the OIC with the new regulation if that is all they are looking for.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, July 16, 2018 9:31 AM  
**To:** s.15;s.19 GCPE:EX  
**Subject:** Questions  
Good Morning,

I have been receiving a lot of calls this morning here to the main number about the press release that went out on Friday in regards to 'Protecting land in the ALR guides cannabis production regulation'. I have had people looking to see the new regulations.

Who should we be directing the calls to? Please let me know!

Thanks!

s.15;s.19

Ministry of Agriculture, s.15;s.19  
s.15;s.19

**From:** s.15;s.19 EX  
**To:** s.15;s.19 PREM:EX  
**Cc:** s.15;s.19 AGRI:EX s.15;s.19 :EX;s.15;s.19 AGRI:EX  
**Subject:** RE: questions regarding forthcoming OICs  
**Date:** Friday, June 15, 2018 16:01:43

---

His.15;s.19

In summary:

- a. Local governments were aware that the feds/BC were moving to allow cannabis to be grown in open fields when AGRI consulted, and this was not of significant concern to them.
- b. We don't need to wait for the fed act to come into force. Licenses are being issued now and the distinction between medical and non-medical cannabis will become meaningless on legalization.

s.13

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, June 15, 2018 3:44 PM  
**To:** s.15;s.19 AGRI:EX;s.15;s.19 PREM:EX  
**Cc:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** RE: questions regarding forthcoming OICs  
His.15;s.19

I attended two JCCR (Joint Provincial and Local Government Commission for Cannabis Regulation) meetings with the Cannabis Secretariat where I talked to UBCM representatives. In addition, I have had multiple meetings with Ministry of Municipal Affairs and Housing staff and engaged in conversations with a number of stakeholders related to local governance and cannabis regulation. At all of these meetings, I have made it very clear that the proposed *Cannabis Act* will permit open field growing of cannabis. I also relied that the proposed *Cannabis Act* would set out security regulations for open field production i.e. physical barriers (for example walls or fences to prevent unauthorized access). Large scale outdoor growing will likely also require visual monitoring of the entire perimeter at all times and alarms or other intrusion detection systems. At the JCCR meetings, local governments did raise concerns related to open field growing and security, however when explained that home cultivation of up to four cannabis plants would be permitted under the *Cannabis Act*, the risk related to security issues would likely be diminished. In summary, security issues related to outdoor production although mentioned by local government was not their primary concern. With regards to dual licences, the *Cannabis Act* will legalize non-medical cannabis and with this legalization the production of medical and non-medical cannabis will become indivisible, meaning no different will exist between the two, cannabis will be cannabis. Medical cannabis is currently a designated farm use and therefore possibly by default once legalized, non-medical cannabis would be designated as well.s.13

s.13

If you have any additional questions please feel free to contact me. I have been heavily involved in the Cannabis Legalization and Regulation project since Jan 2017 and am well informed of both the provincial direction on this project as well as AGRI's policy creation related to cannabis.

Regards.s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, June 15, 2018 3:09 PM  
**To:** s.15;s.19 PREM:EX  
**Cc:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX

**Subject:** FW: questions regarding forthcoming OICs  
s.15;s.19

We just got the tagged order and s.15;s.1 will load to SharePoint.  
s.13

I am cc'ing s.15;s.19 the lead policy analyst on cannabis here and she will respond to your second question.  
s.15;s.19

---

**From:** s.15;s.19 PREM:EX  
**Sent:** Friday, June 15, 2018 2:52 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 PREM:EX

**Subject:** FW: questions regarding forthcoming OICs

Hi Patrick, just checking in on the status of the tagged OIC.

Also had a question on the consultation. When AGRI consulted, were local gov'ts aware that the feds/BC were moving to allow cannabis to be grown in open fields? A couple of years ago, local gov'ts were concerned around public safety when the bunker like production facilities were first approved so I expect they may be more concerned about growing cannabis in open fields.

s.13

Thanks

s.15;s.19

---

**From:** s.15;s.19 PREM:EX  
**Sent:** Tuesday, June 12, 2018 11:29 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** RE: questions regarding forthcoming OICs

Hello,

Thank you for R2285, when you post a revised info summary could you please somehow indicate the changes. I didn't have this OIC on my radar but it will be on the July 4<sup>th</sup> agenda. I have placeholders  
s.13 are they still coming in addition to the one mentioned below.

Please post what info you can by noon today, we would appreciate the tagged OIC by Friday at noon.

s.15;s.19

Cabinet Operations

s.15;s.19

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, June 12, 2018 11:06 AM  
**To:** s.15;s.19 PREM:EX  
**Subject:** questions regarding forthcoming OICs

s.15;s.19

I have posted a draft OIC package to Cab Ops sharepoint. There may be some adjustments to the Cabinet Summary Information document that I can upload tomorrow morning – is that ok?  
Secondly, we have another OIC that we hope goes to Cabinet July 4. We do not yet have a tagged order. Can I post the draft tagged order as part of the OIC pkg to Sharepoint? Any guidance is much appreciated.  
Thank you!  
Regards,

s.15;s.19

Corporate Governance, Policy & Legislation Branch  
Ministry of Agriculture

s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** GRI:EX  
**Subject:** Re: Recommended approach s.12;s.13;s.14  
**Date:** Monday, May 28, 2018 07:01:07

---

Thanks for sharing s.15;s.19

s.12;s.13;s.14

s.15;s.19

Sent from my BlackBerry 10 smartphone on the TELUS network.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, May 28, 2018 12:03 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Fw: Recommended approach s.12;s.13

---

FYI

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**From:** s.15;s.19 AGRI:EX  
**Sent:** May-28-18 12:00 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Recommended approach s.12;s.13

Hi s.15;s.19 here is a rough sketch of what I suggested on Friday - hope it helps.

s.12;s.13

s.12;s.13;s.14

Let me know if I can provide you with anything else.

Thanks,  
s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** RE: Redirection of cannabis correspondence responses to Legislation  
**Date:** Wednesday, July 25, 2018 07:27:41

---

Ok,

Send on to me and we will prepare letters for response.

Thanks,

s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, July 25, 2018 6:39 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Redirection of cannabis correspondence responses to Legislation  
His.15;s.19

I've just sent two cannabis production eApps back to s.15;s.19 to send to s.15;s.19 Policy is not  
s.13

Thanks,

s.15;s.19



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Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 MAH:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 MAH:EX  
**Subject:** Re: s.12;s.13  
**Date:** Monday, June 18, 2018 09:15:05

---

Thanks s.15;s.19

Sent from my iPhone

On Jun 15, 2018, at 5:56 PM, s.15;s.19 AGRI:EX s.15;s.19 @gov.bc.ca>  
wrote:

Hi s.15;- sorry for the delay s.15;s.1 s.13 , but my understanding  
is there have been no substantive updates since you saw it.  
s.15;s. developed a draft response to UBCM's correspondence to s.15;s.19  
s.13

Thanks,  
s.15;s.19

---

**From:** s.15;s.19 MAH:EX  
**Sent:** Wednesday, June 13, 2018 8:27 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 MAH:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 ALC:EX  
**Subject:** Re: s.12;s.13  
Hi s.15;s.19  
s.12;s.13

Happy to discuss further.  
s.15;s.19

On Jun 12, 2018, at 11:23 PM, s.15;s.19 AGRI:EX s.15;s.19 @gov.bc.ca>  
wrote:

Hi s.15; thank you so much for getting in touch on this. Yes, we have been  
doing some outreach with MAH via s.15;s. team, and definitely need to do

s.12;s.13

Thanks,  
s.15;s.19

On Jun 12, 2018, at 6:16 PM, s.15;s.19 MAH:Es.15;s.19 [s.15;s.19@gov.bc.ca](mailto:s.15;s.19@gov.bc.ca)>  
wrote:

Hello s.15;s.19

I was talking to s.15;s.19 at the public  
accounts committee on climate change adaptation today  
s.12;s.13;s.14

s.12;s.13;s.14 came up. Unless s.15;s.19 from our Ministry is  
involved or has been apprised, I think we're in the dark on  
this. It would be very valuable I think if we could get an  
update or briefing from you on this work as my  
understanding is that it's moving ahead at quite a pace and  
s.13

Could we set something up?

Thanks very much,  
s.15;s.19

s.15;s.19  
s.15;s.19

Ministry of Municipal Affairs and Housing

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Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Re: setting up approvals for s.13  
**Date:** Wednesday, June 13, 2018 12:04:48

---

Yes but cab ops is being flexible for us on deadlines. Cab ops has draft OIC but will require tagged and since asap. They are good as long as we keep them informed.

Sent from my BlackBerry 10 smartphone on the TELUS network.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, June 13, 2018 12:01 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** FW: setting up approvals for s.12;s.13

---

When is the final signed and tagged OIC package due to cab ops for the July 4<sup>th</sup> cabinet date? Is it today? Three weeks in advance of July 4<sup>th</sup> cabinet date?

s.15;s.19

Ministry of Agriculture

s.15;s.19

---

**From:** s.15;s.19 GRI:EX  
**Sent:** Wednesday, June 13, 2018 11:57 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** setting up approvals for s.12;s.13

c. s.15;s.19

Drafting is now mostly complete (we got a green tag which might be a ministry first). Final editing review and compiling the package is underway which means you should get the package for approval very soon.

I was hoping that DMO could set up time for s.15;s.19 to be briefed on and consider signing the document.

We're targeting Cabinet on July 4<sup>th</sup>, which means the official target deadline for signature is today. We obviously won't make that but should be ok if s.15;s.19 can swing us an extension.

s.15;s.19

Ministry of Agriculture

s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 PSSG:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 PSSG:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Signed AGRI policy DN's  
**Date:** Wednesday, May 30, 2018 13:33:30

---

His.15;s.19

We will have the drafting instructions ready shortly after 2 today, we are just circulating to our policy unit for comment.

s.12;s.13;s.14

s.15;s.19

---

**From:** s.15;s.19 PSSG:EX  
**Sent:** Wednesday, May 30, 2018 11:12 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 PSSG:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Signed AGRI policy DN's

Great - s.15;s.19 do you have an ETA on when those drafting instructions will be ready (just s.12;s.13;s.14

Thanks,

s.15;s.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, May 30, 2018 10:41 AM  
**To:** s.15;s.19 PSSG:EX; s.15;s.19 PSSG:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Signed AGRI policy DN's

Thank you very much for your assistance s.15;s.19 The team is working on the policy approach to send forward for drafting support. I have included s.15;s.19 so she is aware of your offer.

s.15;s.19

Ministry of Agriculture

s.15;s.19

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**From:** s.15;s.19 PSSG:EX  
**Sent:** Wednesday, May 30, 2018 9:39 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 PSSG:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Signed AGRI policy DN's

His.15; - Please let me know where s.12;s.13;s.14

s.12;s.13;s.14

Thanks,

s.15;s.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, May 29, 2018 8:29 PM  
**To:** s.15;s.19 PSSG:EX  
**Cc:** s.15;s.19 PSSG:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** Signed AGRI policy DN's  
s.15;s.

s.12;s.13

s.15;s.19

Ministry of Agriculture  
s.15;s.19

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Withheld pursuant to/removed as

s.14



**From:** s.15;s.19 \AGRI:EX  
**To:** s.15;s.19 \AGRI:EX s.15;s.19 \AGRI:EX  
**Cc:** s.15;s.19 \AGRI:EX  
**Subject:** RE: Unintended consequence - cannabis/greenhouses  
**Date:** Wednesday, May 30, 2018 08:51:50  
**Attachments:** [image001.jpg](#)

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I agree. This is a risk.

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**From** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, May 30, 2018 8:41 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Unintended consequence - cannabis/greenhouses  
Hi all –

s.13

Just voicing this now in the hopes that it will be helpful...  
s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15;s.19



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 CSCD:EX  
**Cc:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** Request for clarification  
**Date:** Monday, August 21, 2017 12:09:21  
**Attachments:** Policy Decisions Document Volume One - draft 4 August 18.docx

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H s.15;s.19

I am reading over the Policy Decisions Document Volume one (attached) to ensure accuracy. I came  
s.13

Feedback is due back to the Secretariat by Aug 23. Any assistance you could give on this would be  
great.

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15;s.19

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**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19  
s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19  
AGRI:EX  
**Subject:** Request for Feedback prior to Aug 24  
**Date:** Friday, August 18, 2017 16:16:52  
**Attachments:** s.12;s.13;s.19

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Hello AGRI Cannabis Working Group,  
I would like to request your feedback on the attached document, AGRI Cannabis Implementation Planning Document v4. This document will be used to identify, collect and organize required resources for the successful implementation of cannabis legalizing the regulation within the Ministry of Agriculture. The information gathered may be used to inform more detailed work plans and future authorizations.

You provided feedback on the Decision Diagram several weeks ago. Revisions have been made and the diagram has now been inserted into the planning document. The document has been piloted by CGPL branch and s.15;s.19 to gain front line perspective. Recommendations gathered from the pilot were used to modify the document.

This document will be presented at the next Executive Director bi weekly meeting which takes place Aug 30, 2017.

Please review the document paying special attention to the Decision Diagram in Part and your program and service areas in Part 4 & 5 . Any feedback you can provide will be greatly appreciated. Please provide feedback no later than Thursday Aug 24, so that changes can be made prior to distribution for the ED meeting.

Thank-you in advance s.15;s.19

s.15;s.19  
Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15;s.19

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s.14

Page 0001 of 1060 to/à Page 0088 of 1060

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s.14

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## INFORMATION BULLETIN

For Immediate Release  
2018AGRI0050-001390  
July 13, 2018

Ministry of Agriculture

### **Protecting land in the ALR guides cannabis production regulation**

VICTORIA – Local and First Nations governments now are able to prohibit cannabis production in the Agricultural Land Reserve (ALR) within their communities, unless it is grown in ways that preserve the productive capacity of agricultural land.

This regulatory change, effective immediately, gives authority to local and Indigenous governments to prohibit cement-based, industrial-style, cannabis-production bunkers on ALR land in their communities, while clarifying that cannabis production in the ALR cannot be prohibited if grown lawfully:

- in an open field;
- in a structure that has a soil base;
- in a structure that was either fully constructed or under construction, with required permits in place, prior to July 13, 2018; or
- in an existing licensed operation.

The regulation allows local governments and First Nations to prohibit the altering of existing structures to increase the size or material used as the base of the structure, and applies, or will apply, to licensed medical and non-medical cannabis facilities in the ALR.

The new framework allows local and First Nations governments to make decisions regarding cannabis production that align with local planning and priorities in their communities.

The regulatory change pertains only to land in the ALR. Local and First Nations governments can regulate or prohibit cannabis production on lands outside of the ALR.

#### **Quick Facts:**

- Once the federal Cannabis Act comes into force on Oct. 17, 2018, the federal government has announced it will allow cannabis producers to grow cannabis in open fields, greenhouses and industrial bunkers.
- There is no biological difference between a cannabis plant grown for medical or for non-medical purposes.

#### **Contact:**

s.15;s.19

Ministry of Agriculture  
s.15;s.19



# J.T. Fyles Natural Resources Library

## R<sup>3</sup>: Research Request Results

NRS Shared Library Services

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Requester: s.15;s.19

AGRI

**Date received:** February 27, 2017

**Details:** Current laws, regulations, etc. governing medical marijuana/hemp in BC.

**Timeframe:** Results by March 13, 2017

**Keywords:**

- hemp OR marijuana OR marihuana OR cannabis

**Sources:**

- Canada. Health Canada
- Canada. Department of Justice
- British Columbia. Queen's Printer
- CanLII (Canadian Legal Information Institute)
- BC municipal web sites

**Time spent on request:** 5h 41m

## General information

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- Title:** Allard et al. v. Canada  
**Source:** CanLII  
**Date:** February 24, 2016  
**URL:** <http://www.canlii.org/en/ca/fct/doc/2014/2014fc280/2014fc280.pdf>  
<http://www.canlii.org/en/ca/fct/doc/2014/2014fc280/2014fc280.html>
- Note:** This 2016 court decision rendered invalid the Marihuana for Medical Purposes Regulations (MMPR) that were in effect at the time, requiring the Government of Canada to enact a “new or parallel marijuana regime” to be compliant with the Canadian Charter of Rights and Freedoms within six months. The Access to Cannabis for Medical Purposes Regulations is the result.
- Title:** About Hemp & Canada’s Hemp Industry  
**Source:** Canada. Health Canada  
**Date:** April 27, 2016  
**URL:** <http://www.hc-sc.gc.ca/hc-ps/substancontrol/hemp-chanvre/about-apropos/faq/index-eng.php>
- Title:** Cannabis for Medical Purposes  
**Source:** Canada. Health Canada  
**Date:** Undated  
**URL:** <https://www.canada.ca/en/health-canada/topics/cannabis-for-medical-purposes.html>
- Title:** Cannabis Businesses  
**Source:** City of Victoria  
**Date:** Undated  
**URL:** <http://www.victoria.ca/EN/main/business/permits-licences/medical-cannabis-businesses.html>
- Title:** A Framework for the Legalization and Regulation of Cannabis in Canada  
**Source:** Canada. Task Force on Cannabis Legalization and Regulation / Canada. Health Canada  
**Date:** November 30, 2016  
**URL:** [http://www.healthycanadians.gc.ca/task-force-marijuana-groupe-etude/framework-cadre/index-eng.php?\\_ga=1.96830170.432021275.1488235278](http://www.healthycanadians.gc.ca/task-force-marijuana-groupe-etude/framework-cadre/index-eng.php?_ga=1.96830170.432021275.1488235278)  
<http://www.healthycanadians.gc.ca/task-force-marijuana-groupe-etude/framework-cadre/alt/framework-cadre-eng.pdf>
- Title:** Information for Municipalities  
**Source:** Health Canada  
**Date:** August 19, 2016  
**URL:** <http://www.hc-sc.gc.ca/dhp-mps/marihuana/muni/index-eng.php>



**Excerpt:** As of August 24, 2016, the way that Canadians can access cannabis for medical purposes has changed.

If a person wants to use cannabis for medical purposes, the first step is to visit a health care practitioner. A health care practitioner will assess the person to determine if cannabis is an appropriate option for him/her. If the health care practitioner determines that cannabis is an appropriate option, the practitioner would give the person a medical document....

Licensed producers are expected to obey all relevant federal, provincial and municipal laws and by-laws, including municipal zoning by-laws.

**Title:** **Information on the new Access to Cannabis for Medical Purposes regulations**

**Source:** Canada. Health Canada

**Date:** August 19, 2016

**URL:** <http://www.hc-sc.gc.ca/dhp-mps/marihuana/about-apropos-eng.php>

**Excerpt:** The Marihuana for Medical Purposes Regulations (MMPR) were repealed on August 24, 2016. The MMPR created conditions for a commercial industry that is responsible for the production and distribution of marijuana for medical purposes. They also made sure that Canadians with a medical need can access quality-controlled marijuana grown under secure and sanitary conditions.

The Marihuana Medical Access Regulations (MMAR) were repealed on March 31, 2014. However, as a result of a Federal Court Order granted on March 21, 2014, individuals who were previously authorized to possess and/or produce marijuana under the former MMAR and who meet the terms of the Federal Court injunction order may continue to do so until the Court orders otherwise.

**Title:** **Medical Marijuana**

**Source:** British Columbia. HealthLink BC

**Date:** January 20, 2017

**URL:** <https://www.healthlinkbc.ca/health-topics/abl2153>

**Excerpt:** Health Canada can approve access to marijuana (marihuana, cannabis) for medical use to help treat the symptoms of certain medical conditions. Under the Marihuana for Medical Purposes Regulations you can apply for approval to use marijuana if you are suffering from a serious or debilitating illness, live in Canada, and have the support of a medical doctor. For more information on medical marijuana in Canada, visit Health Canada - Medical Use of Marihuana, call the Marihuana Medical Access Program at 1-866-337-7705, or speak with your health care provider.

**Title:** **Procedures for Accessing Cannabis for Medical Purposes from a Licensed Producer**

**Source:** Canada. Health Canada

**Date:** September 1, 2016

**URL:** <http://www.hc-sc.gc.ca/dhp-mps/marihuana/access-acceder-eng.php>

**Title:** **Regulating Medical Marihuana Production Facilities in the Agricultural Land Reserve Bylaw Standard**

**Source:** British Columbia. Ministry of Agriculture

**Date:** Undated

**URL:** <http://www2.gov.bc.ca/gov/content/industry/agriculture-seafood/agricultural-land-and-environment/strengthening-farming/local-government-bylaw-standards-and-farm-bylaws/medical-marihuana-bylaw-standard>

**Excerpt:** The Minister of Agriculture has established a Minister's Bylaw Standard to guide local government bylaw development regulating medical marihuana production facilities licensed by Health Canada's Marihuana for Medical Purposes Regulations and located in the Agricultural Land Reserve (ALR).

**Title:** **Regulations for medical marijuana-related businesses**

**Source:** City of Vancouver

**Date:** Undated

**URL:** <http://vancouver.ca/doing-business/medical-marijuana-related-business-regulations.aspx>

**Title:** **Understanding the New Access to Cannabis for Medical Purposes Regulations**

**Source:** Canada. Health Canada

**Date:** August 2016

**URL:** [https://www.canada.ca/en/health-canada/services/publications/drugs-health-products/understanding-new-access-to-cannabis-for-medical-purposes-regulations.html?\\_ga=1.21054267.1203627148.1488237415](https://www.canada.ca/en/health-canada/services/publications/drugs-health-products/understanding-new-access-to-cannabis-for-medical-purposes-regulations.html?_ga=1.21054267.1203627148.1488237415)

## Legislation (Federal)

**Title:** **Controlled Drugs and Substances Act (S.C. 1996, c. 19)**  
**Source:** Canada. Department of Justice  
**Date:** Current to January 31, 2017; last amended on November 30, 2016  
**URL:** <http://laws-lois.justice.gc.ca/eng/acts/C-38.8/index.html>  
<http://laws-lois.justice.gc.ca/eng/acts/C-38.8/FullText.html>  
<http://laws-lois.justice.gc.ca/PDF/C-38.8.pdf>  
**Note:** Enabling Act for *Access to Cannabis for Medical Purposes Regulation, Industrial Hemp Regulations, and Narcotic Control Regulations*.

**Title:** **Access to Cannabis for Medical Purposes Regulations – SOR/2016-230**  
**Source:** *Canada Gazette* vol. 150, no. 17, August 24, 2016  
**Date:** Current to August 24, 2016  
**URL:** <http://gazette.gc.ca/rp-pr/p2/2016/2016-08-24/html/sor-dors230-eng.php>

**Title:** **Industrial Hemp Regulations**  
**Source:** Canada. Department of Justice  
**Date:** Current to January 31, 2017; last amended on February 9, 2017  
**URL:** <http://laws-lois.justice.gc.ca/eng/regulations/SOR-98-156/>  
<http://laws-lois.justice.gc.ca/eng/regulations/SOR-98-156/FullText.html>  
<http://laws-lois.justice.gc.ca/PDF/SOR-98-156.pdf>

**Title:** **Narcotic Control Regulations**  
**Source:** Canada. Department of Justice  
**Date:** Current to January 31, 2017; last amended on August 26, 2016  
**URL:** <http://laws-lois.justice.gc.ca/eng/regulations/C.R.C., c. 1041/FullText.html>  
<http://laws-lois.justice.gc.ca/eng/regulations/C.R.C., c. 1041/FullText.html>  
<http://laws-lois.justice.gc.ca/PDF/C.R.C., c. 1041.pdf>

## Legislation (Provincial)

**Title:** Agricultural Land Reserve Use, Subdivision and Procedure Regulation

**Source:** British Columbia. Queen's Printer

**Date:** Includes amendments up to B.C. Reg. 210/2016, August 2, 2016

**URL:**

[http://www.bclaws.ca/civix/document/id/complete/statreg/171\\_2002/search/CIVIX\\_DOCUMENT\\_ROOT\\_STEM:\(marihuana\)?1#hit1](http://www.bclaws.ca/civix/document/id/complete/statreg/171_2002/search/CIVIX_DOCUMENT_ROOT_STEM:(marihuana)?1#hit1)

**Excerpt:** 2(2): The following activities are designated as farm use for the purposes of the Act:...  
(p) the production of marihuana in accordance with the Marihuana for Medical Purposes Regulations, SOR/2013-119 (Canada)

**Title:** Classification of Land as a Farm Regulation, Schedule, Qualifying Agricultural Uses

**Source:** British Columbia. Queen's Printer

**Date:** Includes amendments up to B.C. Reg. 135/2014, June 24, 2014

**URL:**

[http://www.bclaws.ca/civix/document/id/complete/statreg/411\\_95/search/CIVIX\\_DOCUMENT\\_ROOT\\_STEM:\(cannabis\)?1#hit1](http://www.bclaws.ca/civix/document/id/complete/statreg/411_95/search/CIVIX_DOCUMENT_ROOT_STEM:(cannabis)?1#hit1)

**Excerpt:** 2 The following are excluded uses for the purposes of paragraph (b) of the definition of "qualifying agricultural use" in section 1(1) of this regulation:...  
(f) the production of any substance set out in item 1 [*opium poppy*], 2 [*coca*] or 17 [*cannabis*] of the Schedule to the *Narcotic Control Regulations under the Controlled Drugs and Substances Act* (Canada), other than the production of industrial hemp in accordance with the Industrial Hemp Regulations under that Act.

## Legislation (Municipal)

**NOTE:** This is not a comprehensive list of medical marijuana-related bylaws in BC municipalities. Only municipalities with a 2011 population of 20,000 or greater<sup>1</sup> were investigated: Abbotsford, Burnaby, Campbell River, Chilliwack, Coquitlam, Courtenay, Delta, Kamloops, Kelowna, Langford, Langley, Maple Ridge, North Vancouver (City), Nanaimo, New Westminster, Penticton, Port Moody, Prince George, Richmond, Surrey, Vancouver, Vernon, Victoria, West Kelowna, Whistler.

A number of BC municipalities also have “safe premises,” “nuisance” or “grow-op” bylaws that cover remediation of properties affected by marijuana grow operations. These bylaws are not reflected in the results below.

### City of Abbotsford

**Title:** Consolidated Business Licence Bylaw, 2006 – no. 1551-2006

**Source:** City of Abbotsford

**Date:** Consolidated to September 12, 2016

**URL:** [https://abbotsford.civicweb.net/filepro/document/8097/Business%20Licence%20Bylaw%2C%202006%2C%20Consolidated%20\(1551-2006\).pdf](https://abbotsford.civicweb.net/filepro/document/8097/Business%20Licence%20Bylaw%2C%202006%2C%20Consolidated%20(1551-2006).pdf)

**Notes:**

- Section 11.17 defines medical marihuana production facility (MMPF).
- Schedule B sets fee for MMPF business licence at \$5,000.

**Title:** Consolidated Building Bylaw, 2003 – no. 1274-2003

**Source:** City of Abbotsford

**Date:** Consolidated to June 27, 2016

**URL:** [https://abbotsford.civicweb.net/filepro/document/6982/Building%20Bylaw%2C%202003%2C%20Consolidated%20\(1274-2003\).pdf](https://abbotsford.civicweb.net/filepro/document/6982/Building%20Bylaw%2C%202003%2C%20Consolidated%20(1274-2003).pdf)

**Notes:**

- Section 8.1(q) requires building permit before construction of MMPF.
- Section 9.4 requires MMPFs to submit additional information with building permit applications.

**Title:** Zoning Bylaw, 2014 – no. 2400-2014

**Source:** City of Abbotsford

**Date:** Consolidation date unknown (January 2016?)

**URL:** <https://abbotsford.civicweb.net/Documents/DocumentList.aspx?ID=16830>

**Note:**

- Section 200 permits medical marijuana production in zones A1, A2, A3, A4, A5 and A6.

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<sup>1</sup> Wikipedia, “List of Cities in British Columbia,” [https://en.wikipedia.org/wiki/List\\_of\\_cities\\_in\\_British\\_Columbia](https://en.wikipedia.org/wiki/List_of_cities_in_British_Columbia).

## City of Coquitlam

**Title:** Business Licence Bylaw – no. 4344, 2013

**Source:** City of Coquitlam

**Date:** March 10, 2014

**URL:** <http://publicdocs.coquitlam.ca/cyberdocs/getdoc.asp?doc=1668098>

**Note:**

- Business license fee for medical marijuana grow operation \$3,500 – Schedule “A”.

**Title:** Development Cost Charges Bylaw – no. 4607, 2015

**Source:** City of Coquitlam

**Date:** January 4, 2016

**URL:** <http://publicdocs.coquitlam.ca/cyberdocs/getdoc.asp?doc=2192993>

**Note:**

- Medical marijuana grow operations included in definition of *Industrial Use*.

**Title:** Zoning Amendment – Industrial Zones Review – no. 4527, 2015

**Source:** City of Coquitlam

**Date:** April 27, 2015

**URL:** <http://publicdocs.coquitlam.ca/cyberdocs/getdoc.asp?doc=2021063>

**Notes:**

- Section 1902(1)(c) permits medical marijuana grow operation in Zone M-2, Industrial Business.
- Section 1902(3) outlines conditions of use for medical marijuana grow operation.

**Title:** Zoning Amendment – Medical Marijuana Zoning Regs – no. 4464, 2014

**Source:** City of Coquitlam

**Date:** April 1, 2014

**URL:** <http://publicdocs.coquitlam.ca/cyberdocs/getdoc.asp?doc=1682765>

**Note:**

- Section 2(A) amends definition of *Marijuana Dispensary* – section 2(A).

**Title:** Zoning Text Amendment – Medical Marijuana – no. 4328, 2012

**Source:** City of Coquitlam

**Date:** July 30, 2012

**URL:** <http://publicdocs.coquitlam.ca/cyberdocs/getdoc.asp?doc=1287840>

**Notes:**

- Section 2(A) states *Agricultural* use excludes medical marijuana grow operation – section 2(A).
- Section 2(B) provides new definitions for *Controlled Substance*, *Medical Marijuana Grow Operation* and *Marijuana Dispensary* – section 2(B)
- Sections 2(C) through (I) have multiple additional amendments related to medical marijuana grow operations.

## City of Chilliwack

**Title:** Zoning Bylaw 2002 – no. 2800

**Source:** City of Chilliwack

**Date:** Consolidated to July 21, 2015

**URL:** <http://www.chilliwack.ca/main/page.cfm?id=377>

**Notes:**

- Section 4.04(11), Basic Provisions, prohibits MMPF use except as an allowable farm use within the ALR or as specifically permitted elsewhere in this bylaw.
- Section 6.01(2)(g) and (h), Use Regulations, set out conditions permitting MMPFs under restricted agriculture and general agriculture zoning.
- Section 6.04(4) and (13) prohibits warehousing of MMPF goods/commodities and composting of MMPF materials (section 6.04(13)).

## City of Courtenay

**Title:** Zoning Bylaw – no. 2500, 2007

**Source:** City of Courtenay

**Date:** Consolidated to July 21, 2015

**URL:** [http://www.courtenay.ca/assets/Departments/Development~Services/Bylaw\\_2500\\_Zoning.pdf.pdf](http://www.courtenay.ca/assets/Departments/Development~Services/Bylaw_2500_Zoning.pdf.pdf)

**Notes:**

- Section 6.3.14 prohibits MMPF as a home occupation.
- Section 6.17.1(a) prohibits MMPF use of land, water, buildings or structures in all zones, unless specifically permitted within this Bylaw, with the exception of ALR lands.
- Section 6.17.1(b) permits MMPF on ALR land if the operation is contained wholly within licensed facilities with a minimum setback of 30m from all property lines.

## City of Kamloops

**Title:** Zoning Bylaw – no. 5-1-2001

**Source:** City of Kamloops

**Date:** September 7, 2016

**URL:** <https://kamloops.civicweb.net/filepro/documents/10507>

**Note:**

- Medical marijuana production permitted in zones I-2 (General Industrial) and I-3 (Heavy Industrial).

## City of Kelowna

**Title:** Medical Marihuana Producer Business Licence and Regulation Bylaw – no. 10920

**Source:** City of Kelowna

**Date:** March 9, 2015

**URL:**

[https://apps.kelowna.ca/CityPage/Docs/PDFs/Bylaws/MMPR Business Licence and Regulation Bylaw No.10920.pdf](https://apps.kelowna.ca/CityPage/Docs/PDFs/Bylaws/MMPR_Business_Licence_and_Regulation_Bylaw_No.10920.pdf)

**City of Langford**

**Title:** Business Licence & Business Regulation Bylaw – no. 216, 1997

**Source:** City of Langford

**Date:** Consolidated to February 7, 2015

**URL:**

<http://www.cityoflangford.ca/assets/Bylaws/Business/Bus%20Lic%20and%20Bus%20Reg%20Byl%20216,%2097%20CONSOLIDATED%20201502.pdf>

**Note:**

- *Hemp* defined as the plant *Cannabis sativa* or any derivative or synthetic preparation of it.
- Section 31.1 prohibits hemp stores from operating within a three-mile radius of any elementary, junior secondary or senior secondary school.

**Title:** Zoning Bylaw – no. 300

**Source:** City of Langford

**Date:** Consolidated to February 6, 2017

**URL:** <http://www.cityoflangford.ca/assets/Bylaws/Land~Use/zoning-300.pdf>

**Note:**

- Section 3.02.02 prohibits the sale or distribution of *Cannabis sativa* in any form and related drug paraphernalia, other than in a licensed pharmacy, in every Zone.

**City of Langley**

**Title:** Zoning Bylaw – no. 2100

**Source:** City of Langley

**Date:** Consolidated to December 2, 2016

**URL:**

<https://www.city.langley.bc.ca/sites/default/files/uploads/Zoning%20Bylaw%20December%205%202016.pdf>

**Note:**

- Part 1(D)2(c) prohibits the use of any premises for the cultivation, growing, production, packaging, storage, distribution, dispensing, trading or selling of cannabis (marihuana) in all Zones.

**City of Maple Ridge**

**Title:** Zoning Bylaw – no. 3510-1985

**Source:** City of Maple Ridge

**Date:** Consolidated to December 2016



**URL:** <https://www.mapleridge.ca/DocumentCenter/View/587>

**Notes:**

- Section 401(3)(e) prohibits use of lands, buildings and structures in all zones for commercial cultivation, processing, testing, packaging, shipping and sale of marihuana, except as permitted on lands designated as ALR in the RS-1, RS-2, RS-3, A-1, A-2, A-3, A-4 and A-5 zones.
- Section 501(16) permits medical marijuana commercial production (MMCP) in A-1, A-2 or A-3 zones; Section 502(14) prohibits MMCP in A-1, A-2 or A-3 unless the land is designated ALR. Section 503(7) lays out requirements for siting of MMCP buildings and structures.
- Section 504(A)(11) permits MMCP in Intensive Greenhouse District (A-4); Section 504(D)(8) prohibits MMCP in A-4 unless the land is designated ALR.
- Section 505(A)(3) permits MMCP in Agriculture Only Zone (A-5); Section 505(F)(2) lays out requirements for siting of MMCP buildings and structures; Section 505(H)(2) prohibits MMCP in A-5 unless the land is designated ALR.
- Section 601(A) permits MMCP in residential zones RS-1, RS-2 and RS-3; section 601(B)(15) prohibits MMCP in RS-1, RS-2 and RS-3 unless the land is designated ALR; Section 601(C)(17) lays out requirements for siting of MMCP buildings and structures.

## City of Nanaimo

**Title:** **Zoning Bylaw no. 4500**

**Source:** City of Nanaimo

**Date:** Consolidated to February 1, 2016

**URL:** <http://www.nanaimo.ca/ByLaws/ViewBylaw/4500.pdf>

**Notes:**

- Section 13.2.1 permits medical marihuana growing and production in Zone I4 with site specific use.
- Part 13.2.3 describes permitted sites for medical marihuana growing and production.

## City of North Vancouver

**Title:** **Zoning Bylaw – no. 7584, 2004**

**Source:** City of North Vancouver

**Date:** Consolidated to December 5, 2016

**URL:** <http://www.cnv.org/-/media/city-of-north-vancouver/documents/bylaws/7/5/7584-c.pdf>

**Notes:**

- Section 525 lays out regulations applicable to medical marijuana licensed producers (MMLPs).
- Schedule (B), Table VIII(A) sets annual fee for MMLPs of \$3,691.00

**Title:** **Zoning Bylaw, 1995, No. 6700**

**Source:** City of North Vancouver

**Date:** Consolidated to December 12, 2016

**URL:** <http://www.cnv.org/-/media/city-of-north-vancouver/documents/bylaws/6/7/6700-1-c.pdf>

**Note:**

- Section 404 lays out regulations applicable to medical marijuana licensed producers (MMLPs).

## City of Penticton

**Title:** Fees and Charges Bylaw, no. 2014-07

**Source:** City of Penticton

**Date:** Consolidated to December 20, 2016

**URL:**

<http://www.penticton.ca/assets/City~Hall/Bylaws/Finance/Fees%20and%20Charges%20Bylaw%20No.%202014-07.pdf>

**Note:**

- Appendix 5 sets business licence fee for marijuana dispensary (including non-profit marijuana dispensary) at \$5,000.00.

## City of Port Moody

**Title:** Zoning Bylaw, no. 1890

**Source:** City of Port Moody

**Date:** Consolidated to October 21, 2016

**URL:** <http://www.portmoody.ca/modules/showdocument.aspx?documentid=12649>

**Note:**

- Section 5.1 permits medical marihuana production and testing in all zones.

## City of Richmond

**Title:** Report to Committee re. regulations for marihuana dispensaries

**Source:** City of Richmond

**Date:** January 10, 2017

**URL:** [http://www.richmond.ca/\\_shared/assets/\\_1\\_Regulations\\_MarihuanaDispensaries46184.pdf](http://www.richmond.ca/_shared/assets/_1_Regulations_MarihuanaDispensaries46184.pdf)

**Note:**

- Recommendation to amend Zoning bylaw to add a definition of “marihuana dispensary.”

**Title:** Zoning Bylaw 8500

**Source:** City of Richmond

**Date:** 1/31/2017

**URL:** <http://www.richmond.ca/cityhall/bylaws/zoningbylaw8500/about8500.htm>

**Note:**

- Amended December 16, 2013 to include definitions of “medical marihuana production facility” and “medical marihuana research and development facility.”

## City of Surrey

**Title:** A By-law to Licence and Regulate the Cultivation and Production of Medical Marijuana (no. 17410)  
**Source:** City of Surrey  
**Date:** June 27, 2011  
**URL:** [http://www.surrey.ca/bylawsandcouncillibrary/BYL\\_reg\\_17410.pdf](http://www.surrey.ca/bylawsandcouncillibrary/BYL_reg_17410.pdf)

## City of Vancouver

**Title:** A By-law to Provide for the Issuing of Licences and Regulation of Business, Trades, Professions and Other Occupations within the City of Vancouver No. 4450  
**Source:** City of Vancouver  
**Date:** Consolidated to October 5, 2016; amended to include By-law no. 11644, effective January 1, 2017  
**URL:** <http://bylaws.vancouver.ca/4450c.PDF>  
**Note:**

- See sections 12 (p. 33: Compassion Club) and 24.5 (p. 63: Retail Dealer – Medical Marijuana-Related).

**Title:** Licence By-law Amending By-law Re. Retail Dealer – Medical Marijuana-related  
**Source:** City of Vancouver  
**Date:** June 24, 2015  
**URL:** <http://former.vancouver.ca/ctyclerk/cclerk/20150624/documents/ptecbylaws.pdf#page=13>

**Title:** Zoning and Development By-law 3575  
**Source:** City of Vancouver  
**Date:** Amended up to November 29, 2016  
**URL:** <http://vancouver.ca/your-government/zoning-development-bylaw.aspx>  
**Note:**

- See Section 11.28, “Medical marijuana-related use” and Schedules C-2, “District Schedule,” FC-1 “District Schedule – East False Creek,” HA-1 and HA-1A, HA-2 (“Gastown Historic Area”), HA-3, and Appendix E (“Zoning and Development Fee By-law No. 5585”).

## City of Victoria

**Title:** Cannabis-related Business Regulation Bylaw (no. 16-061)  
**Source:** City of Victoria  
**Date:** September 22, 2016  
**URL:** <http://www.victoria.ca/assets/City~Hall/Bylaws/16-061%20Cannabis%20Related%20Business%20Regulation%20Bylaw.pdf>

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s.14; s.12

**Ministry of Agriculture**  
**BRIEFING NOTE FOR MINISTER FOR INFORMATION FOR MEETING WITH CANOPY**  
**GROWTH CORPORATION**

Ref: 188574

Date: June 21, 2018

**Title:** Canopy Growth Corporation request for a meeting with <sup>s.15;s.19</sup>

**Issue:** Canopy Growth Corporation (Canopy) has asked to meet to discuss cannabis production in B.C. Revitalization.

**Background:** In 2017, BC Tweed was established when Canopy Growth Corporation entered a joint venture with B.C.'s Sunselect (Greenhouse producer) to develop a 1.3 million square foot greenhouse in Aldergrove B.C. for cannabis cultivation. In February 2018, the Aldergrove site received a licence to produce medical cannabis from Health Canada. In April 2018, a second BC Tweed site in Delta B.C. received a production licence for 900,000 sq. ft. greenhouse. A recent online news article indicates that in May 2018, "Canopy Growth-Canada's largest licensed cannabis producer, which is aiming for a New York Stock Exchange listing-bought out greenhouse operator BC Tweed Joint Venture for \$289 million in shares" (Fortune.com, June 8, 2018).

Canopy is a major investor in commercial cannabis production in Canada. Canopy has large scale facilities in Ontario and B.C. In B.C., Canopy entered into a joint venture with B.C.'s Sunselect, a large scale greenhouse producer. According to recent online news, in May 2018, Canopy purchased the majority of the B.C. Tweed shares from Sunselect. Presumably, as Canopy is now a major investor in the B.C. cannabis cultivation industry, Canopy is now looking to engage with the provincial government.

On June 8, 2018 an email was received requesting <sup>s.12;s.13</sup> meet with Jeff Ryan, Vice President of Government and Stakeholder Relations and Stephanie Tan, Director of Government and Stakeholder Relations for Western Canada Canopy Growth Corporation. They would like to discuss Canopy's plans for cannabis production in B.C. and how those plans might be impacted by the Revitalization of the Agricultural Land Reserve and the Agricultural Land Commission. As Canopy has already invested millions of dollars into its two B.C. sites, it would be in the company's best interest to ensure that future provincial regulations and legislation will not impact current or planned future investments.

The federal government announced its intent to legalize non-medical cannabis by October 17, 2018. Provinces and Territories are working to develop the provincial framework that includes a distribution and retail system that aligns with the federal legislation. The Province established the Cannabis Legalization and Regulation Secretariat (the Secretariat) to coordinate provincial planning for the safe implementation of legalized non-medical cannabis. The Ministry of Agriculture (AGRI) has staff actively participating in the Secretariat to address policy issues related to cannabis on the Agricultural Land Reserve (ALR). The goal is for the Province to be ready by the deadline that has now been announced.

**Discussion:** <sup>s.13</sup>  
<sup>s.13</sup>

s.13

s.13;s.16

s.13;s.16

s.14

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In January 2018, the Minister of Agriculture appointed an independent nine member Minister's Advisory Committee that is responsible for leading a comprehensive public engagement process to develop legislative recommendations that respond to the Minister's mandate letter commitment to 'Revitalize the ALR and the ALC'. The Advisory Committee travelled to nine communities to hear from local governments, key agricultural organizations and stakeholders. British Columbians were encouraged to submit their opinions through an online survey and written submissions which closed on April 30, 2018. Over 2300 British Columbians responded confirming that it is a priority of the Province to preserve the ALR in recognition of food security, prevent further erosion of the land base, and make farming and ranching the number one priority. The Minister's Advisory Committee's public report, expected this summer, will include the legislative recommendations, and additional regulatory and administration recommendations for the Province to consider.

**Suggested Response:**

- The federal government has announced that the Provinces and Territories will need to have a provincial distribution and retail system in place by October 17, 2018.
- The Ministry of Agriculture is working with the provincially established Cannabis Legalization and Regulation Secretariat to create a comprehensive provincial regulatory framework for cannabis.
- Ensuring an appropriate balance between economic development and public health and safety is a primary goal of the Province.
- The Minister of Agriculture is expecting a report from the Minister's Advisory Committee that has been tasked with 'Revitalization of the ALR and the ALC' with recommendations for the Province to consider in early summer.
- If you would like further information about some of the Minister's Advisory Committee's potential proposals, the committee's Discussion Paper can be found online

s.13

Contact: s.15;s.19

ED s.15;s.

ADM

DM

**Ministry of Agriculture**  
**BRIEFING NOTE FOR MINISTER FOR INFORMATION FOR MEETING WITH UBCM**  
**ON REGULATION OF CANNABIS ON THE ALR**

Ref: 188584

Date: June 19, 2018

**Title:** Regulation of Non-medical Cannabis on the Agricultural Land Reserve.

**Issue:** The Union of British Columbia Municipalities (UBCM) is requesting a meeting with s.15;s.19 s.15;s.19 to discuss cannabis production on the Agricultural Land Reserve (ALR).

**Background:** In 2013, the Province identified that medical cannabis met the definition of farm use under the *Agriculture Land Commission Act* (ALCA) and its production facilities were permitted on ALR land. In 2015, the Agricultural Land Reserve Use, Subdivision and Procedure Regulation (Regulation) was amended to make medical cannabis a 'designated farm use' that local governments could not prohibit. Local governments could still regulate siting and sizing of these production facilities. This regulatory amendment was not well received by local governments who wanted the ability to prohibit cannabis production within their jurisdictions.

The federal government announced its intent to legalize non-medical cannabis in the summer of 2018. In April 2017, the Province established the Cannabis Legalization and Regulation Secretariat (the Secretariat) to coordinate provincial planning for the safe implementation of legalized non-medical cannabis. As part of this work the Province and UBCM established a Joint Provincial-Local Government Committee on Cannabis Regulation (JCCR). The JCCR provides an ongoing forum for communication and consultation with local governments. Ministry of Agriculture (AGRI) staff have attended two JCCR meetings to provide information and gather input related to the regulation of cannabis on the ALR.

During discussions with UBCM representatives at the JCCR, the following concerns were raised related to cannabis production on the ALR:

- Taxation benefits for cannabis producers
- Impacts on food security
- Enforcement issues
- Impact and usage of local resources (e.g. water usage)
- Increased nuisance (e.g. odour, noise, light)

As federal legalization approaches, municipalities and the Agricultural Land Commission (ALC) have reported a high number of new builds on prime agricultural land. There is concern that this construction of cement based cannabis bunkers will displace food production and permanently damage soil, due to the building of structures that require fill and coverage of ALR lands. All current cannabis related construction, whether on or off the ALR, is for medical cannabis. The federal government has indicated its intent to approve applications for dual licenses for both medical and non-medical cannabis.

UBCM is requesting a moratorium on the production of non-medical cannabis on the ALR until a comprehensive review and broad consultation have been conducted by the provincial government. Some local governments have also asked the Province to provide them with the ability to address



cannabis concerns in their communities. In February 2018, the Central Saanich municipal council passed a motion asking the Premier andS.15;s.19 to place a moratorium on cannabis production in the ALR. The District of North Saanich followed suit in April 2018.

**First Nations Considerations:** s.13;s.16  
s.13;s.16

**Discussion:**s.13  
s.13

s.13

s.13  
s.14  
s.13

s.13

s.13

**Suggested Response:**

- My understanding is that AGRI staff are working closely with other provincial ministries and the Cannabis Secretariat to ensure that the provincial regulatory framework for cannabis reflects the views and values of all British Columbians.
- The information provided to AGRI staff at the JCCR table on the issues that UBCM has raised has been and will continue to be considered in the ongoing development of the provincial regulatory framework, including cannabis production on the ALR.
- AGRI staff will continue to engage with local governments on issues related to land use and farm practices for cannabis production.
- AGRI staff have submitted a proposal to provide additional information to local governments at the upcoming UBCM conference in September 2018. This would provide a further opportunity to answer questions and hear concerns from local governments.

Contact: s.15;s.19

ED s.15;s  
.19 \_\_\_\_\_ ADM \_\_\_\_\_ DM \_\_\_\_\_



**MINISTRY OF PUBLIC SAFETY AND SOLICITOR GENERAL  
MINISTRY OF JUSTICE AND ATTORNEY GENERAL  
DECISION NOTE**

**PURPOSE:** For DECISION of the s.15;s.19 , Minister of Public  
Safety and Solicitor General, and the s.15;s.19  
Attorney General.

**BACKGROUND:**

The recommended decisions concern the treatment of cannabis production in the agricultural context, and are approved by the Minister of Forests, Lands, Natural Resource Operations and Rural Development (standing in for the Minister of Agriculture on the cannabis file). See attached decision notes.

**ISSUES:**

**1. To what extent should cannabis producers be eligible for AGRI funded programs?**

Recommendation: Cannabis producers should be eligible for some but not all AGRI funded programs as follows:

1. Cannabis producers will be eligible for some but not all Strategic Investments Program Funding (e.g., will be eligible for innovation funding, but not business development funding).
2. Cannabis producers should not be eligible for Business Risk Management (BRM) (crop insurance) programs. BC will actively pursue the exclusion of cannabis from BRM programs with Agriculture and Agri-Foods Canada.

**2. Should local governments be able to restrict cannabis production on the ALR within their jurisdictions, and if so, to what degree?**

Recommendation: Local governments should have authority to restrict cannabis production by methods that adversely affect the long-term preservation of agricultural land.

Examples of methods of production that local governments could not restrict include open field cultivation and soil-based greenhouses. Examples of types of production that local governments could restrict include cement bunkers and cement-bottom greenhouses; however, existing facilities would be grandfathered.

**APPROVED / NOT APPROVED**

s.15;s.19

**DATE:**

July 9, 2018

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s.15;s.19      Public Safety and Solicitor General

**APPROVED / NOT APPROVED**

**DATE:**

s.15;s.19

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Attorney General

**Prepared by:**

s.15;s.19

Cannabis Legalization  
and Regulation Secretariat  
Policing and Security Branch  
Ministry of Public Safety and Solicitor  
General

**Approved May 30, 2018 by:**

s.15;s.19

s.15;s.19      Police Services  
Policing and Security Branch  
Ministry of Public Safety and Solicitor  
General

**Recommended May 30, 2018 by:**

s.15;s.19

s.15;s.19      Cannabis Legalization  
and Regulation Secretariat  
Policing and Security Branch  
Ministry of Public Safety and Solicitor  
General

**Attachments:**

1. Cliff: 188301\_Eligibility for Ministry of Agriculture Programs
2. Cliff: 188300\_Cannabis Production on Agricultural Land Reserve

Examples of methods of production that local governments could not restrict include open field cultivation and soil-based greenhouses. Examples of types of production that local governments could restrict include cement bunkers and cement-bottom greenhouses; however, existing facilities would be grandfathered.

**APPROVED / NOT APPROVED**

**DATE:**

s.15;s.19

Minister of Public Safety and Solicitor General

**APPROVED / NOT APPROVED**

**DATE:**

s.15;s.19

July 4, 2018

Attorney General

**Prepared by:**

s.15;s.19

Cannabis Legalization  
and Regulation Secretariat  
Policing and Security Branch  
Ministry of Public Safety and Solicitor  
General

**Approved May 30, 2018 by:**

s.15;s.19

s.15;s.19      Police Services  
Policing and Security Branch  
Ministry of Public Safety and Solicitor  
General

**Recommended May 30, 2018 by:**

s.15;s.19

s.15;s.19      Cannabis Legalization  
and Regulation Secretariat  
Policing and Security Branch  
Ministry of Public Safety and Solicitor  
General

**Attachments:**

1. Cliff: 188301\_Eligibility for Ministry of Agriculture Programs
2. Cliff: 188300\_Cannabis Production on Agricultural Land Reserve

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s.14; s.12



## Cabinet Submission – Request for Decision

**Minister:** s.15;s.19

**Ministry:** Ministry of Agriculture

**Date:** DD/MM/YYYY

Ministry Document #:

**Title:**

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s.13; s.12

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s.12; s.14



## Cabinet Submission – Request for Decision

**Minister:** s.15;s.19

**Ministry:** Ministry of Agriculture

**Date:** DD/MM/YYYY

Ministry Document #:

**Title:**

s.12;s.13

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s.12; s.14

# **Ministry of Agriculture: Policy Considerations for Cannabis**

**BRIEFING FOR MINISTER OF FORESTS, LANDS,  
NATURAL RESOURCE OPERATIONS & RURAL  
DEVELOPMENT FOR INFORMATION**

**DRAFT  
CONFIDENTIAL**



## Briefing Overview

- Cannabis production in BC – current state.
- Ministry of Agriculture policy considerations.
- Key Ministry policy issues.
- Seeking Minister's direction.

## Cannabis Production in BC – Current State

Medical cannabis is legal across Canada. In BC:

- It is considered an agricultural crop.
- Producers are (and will continue to be) licensed through Health Canada.
- 18 commercially licensed producers and 151 active license applications.
- Over 2000 designated (non-commercial) producers who cultivate cannabis on behalf of medical users.
- Under BC's Agriculture Land Reserve (ALR) regulation, medical cannabis is a designated farm use and permitted in the ALR.
- Local governments have minimal power to restrict, and cannot prohibit, cannabis production in the ALR.
- Because medical cannabis is currently classified as a narcotic, producers:
  - Are not eligible for most Ministry of Agriculture programs and services.
  - Are not eligible for farm classification for property tax purposes.

## Ministry of Agriculture Policy Considerations

- Once cannabis is legalized and no longer a narcotic, cannabis will become “farm use” and eligible for Ministry programs and services.

s.13;s.16

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s.13; s.12

**ANNOTATED AGENDA**  
**Deputy Ministers Working Group**  
**Cannabis**

**Wednesday, October 18<sup>th</sup>**  
**7:30am – 8:30am**

**1-877-353-9184 Participant Conference ID:**s.15

**1. Review Purpose of Working Group**

**Key Messages:**

s.13

**2. Review slide deck and consultation summary**

s.13



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s.12; s.13; s.14



## Instructions:

- This format is to be used for both Cabinet and Treasury Board (TB) submissions.
- At a minimum you must do the following:
  - state what is the decision you are requesting?
  - identify valid options (and not only “approve” and “do not approve”) and indicate the option that you are recommending.
  - identify the pros and cons for each option.
  - provide estimated fiscal impacts or risks to government’s fiscal plan
- If more than one ministry is sponsoring the submission, each sponsoring minister must sign the submission.
- The Fiscal Impacts section must be completed and the submission reviewed by ministry Executive Financial Officer (EFO) for verification of the fiscal impacts for both Cabinet Submissions and TB Submissions (see “Fiscal Impacts” section for direction on process if there is not agreement on the impacts between Treasury Board Staff (TBS) and the ministry). For Cabinet submissions, before a submission is provided to Cabinet, Cabinet Operations will require email from both your EFO and TB analyst confirming their agreement with the characterization of the fiscal impacts and/or financial risk in the Fiscal Impacts section. (please note, agreement that the information in this section is complete and accurate does not necessarily imply support for the recommendations in the submission).
- Provide a copy of draft and signed Cabinet Submissions to your Treasury Board Analyst at the same time they are provided to Cabinet Operations.
- If your submission includes legal advice, the Legal Advice section must be completed and the submission must be reviewed by your LSB advising solicitor or the Assistant Deputy Attorney General. This review is to ensure that the presentation and characterization of the legal advice in the submission is accurate. For Cabinet Submissions including legal advice, before a submission is provided to Cabinet, Cabinet Operations will require an email from your LSB advising solicitor, or the Assistant Deputy Attorney General, confirming their agreement with the presentation and characterization of the legal advice.



**Maximum length:**

- Cabinet Submissions – 5 pages.
- Try to complete the first three items – **Issue, Request** and **Implications and Considerations** – on the first page.
- Treasury Board submissions are not limited in length however, consult your Treasury Board Analyst if you have further questions. Treasury Board submissions are to be submitted directly to TBS.

**DELETE THE ABOVE BEFORE SENDING**

**Cabinet Submission –  
Request for Decision**

**Minister:** Name(s) and title(s) of the Minister(s) sponsoring the submission

**Ministry:**

**Date:** DD/MM/YYYY

Ministry Document #:

**Title:**

s.12;s.13

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s.12; s.13





If previous funding has been approved for this program, indicate how the funding was spent, the outputs and outcomes that were expected, and the results/achievements realized in relation to the expectations.

Indicate if the decision sets a precedent and creates a future financial exposure for government.

For Cabinet Submissions, it is understood that the fiscal impacts will not always be quantifiable, and in those cases a qualitative assessment of the size/nature of the financial risks will suffice.

Your ministry EFO must review the fiscal impacts and risks prior to finalizing the Cabinet/TB submission and consult with Office of the Comptroller General (OCG) as appropriate to ensure accurate accounting treatment.

However, if the assessment provided is insufficient, TBS may request further work be undertaken. Therefore you should consult extensively with your TB analyst prior to submitting a signed Cabinet/TB submission.

For Cabinet submissions specifically:

- 1) the submission must state whether or not TBS is in agreement with the characterization of the fiscal impacts and whether or not TBS believes the issue requires TB review and why.
- 2) Cabinet Operations will require an email from both your EFO and your TB analyst confirming their agreement with the characterization of the fiscal impacts and/or financial risk.
- 3) If TBS considers the fiscal impacts/risks section to be incomplete or is not in agreement with them – and if this disagreement is not noted in the submission - a one-page “Financial Risk Assessment” will be completed by TBS and distributed to Cabinet with your submission.

#### **Legal Advice:**

Confirm that your LSB advising solicitor, or the Assistant Deputy Attorney General, agrees with the presentation and characterization of any legal advice included in the submission. Cabinet Operations will require an email from your advising solicitor LSB advising solicitor, or the Assistant Deputy Attorney General, confirming their agreement



with the presentation and characterization of any legal advice included in the submission.

**Policy:**

Are there any labour relations, legal or constitutional implications?

Are there any implications for First Nations treaties or negotiations?

**Legislation:**

Is legislation required?

**Stakeholder and Citizens:**

Are there First Nation consultation/accommodation requirements? If an accommodation or similar agreement is contemplated, a negotiating mandate must be requested within the submission (to TB or Cabinet) that clearly defines the scope of proposed discussions, financial implications and timelines.

Have all of the necessary consultations taken place, including consultations with other relevant ministries? Was there public consultation? Is it planned? What were the opinions/reactions of each of the groups?

Contact: First Name Last Name, Title  
(250) XXX-XXXX

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Honourable First Name Last Name

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Date Signed

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s.12; s.13



For Cabinet Submissions, it is understood that the fiscal impacts will not always be quantifiable, and in those cases a qualitative assessment of the size/nature of the financial risks will suffice.

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#### **Policy:**

Are there any labour relations, legal or constitutional implications?

Are there any implications for First Nations treaties or negotiations?



**Legislation:**

Is legislation required?

**Stakeholder and Citizens:**

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Contact: First Name Last Name, Title  
(250) XXX-XXXX

\_\_\_\_\_  
Honourable First Name Last Name

\_\_\_\_\_  
Date Signed

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s.12; s.13





- 1) the submission must state whether or not TBS is in agreement with the characterization of the fiscal impacts and whether or not TBS believes the issue requires TB review and why.
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**Policy:**

Are there any labour relations, legal or constitutional implications?  
Are there any implications for First Nations treaties or negotiations?

**Legislation:**

Is legislation required?

**Stakeholder and Citizens:**

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Contact: First Name Last Name, Title  
(250) XXX-XXXX

\_\_\_\_\_  
Honourable First Name Last Name

\_\_\_\_\_  
Date Signed

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## Cabinet Submission – Request for Decision

**Minister:** Name(s) and title(s) of the Minister(s) sponsoring the submission

**Ministry:**

**Date:** DD/MM/YYYY

Ministry Document #:

**Title:**

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## Cabinet Submission – Request for Decision

**Minister:** Name(s) and title(s) of the Minister(s) sponsoring the submission

**Ministry:**

**Date:** DD/MM/YYYY

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**Title:**

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## Cabinet Submission – Request for Decision

**Minister:** Name(s) and title(s) of the Minister(s) sponsoring the submission

**Ministry:**

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## Cabinet Submission – Request for Decision

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## Cabinet Submission – Request for Decision

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## Cabinet Submission – Request for Decision

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## Cabinet Submission – Request for Decision

**Minister:** s.15;s.19

**Ministry:** Ministry of Agriculture

**Date:** DD/MM/YYYY      Ministry Document #:

**Title:**

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## Cabinet Submission – Request for Decision

**Minister:** s.15;s.19

**Ministry:** Ministry of Agriculture

**Date:** DD/MM/YYYY

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**Title:**

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## Cabinet Submission – Request for Decision

**Minister**S.15;s.19

**Ministry:** Ministry of Agriculture

**Date:** DD/MM/YYYY Ministry Document #:

**Title:**

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## Cabinet Submission – Request for Decision

**Minister:** s.15;s.19

**Ministry:** Ministry of Agriculture

**Date:** DD/MM/YYYY Ministry Document #:

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## Cabinet Submission – Request for Decision

**Minister** s.15;s.19

**Ministry:** Public Safety and Solicitor General

**Date:** DD/MM/YYYY **Ministry Document #:**

**Title:** Cannabis cultivation, processing, and product standards

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# **Cannabis and Agriculture**

Ministry of Agriculture  
Cabinet Submission

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# BC Agriculture and Medical Cannabis

- Medical cannabis is an “agricultural product”
  - Production allowed on Agricultural Land Reserve (ALR)
  - Corresponding protections under *Right to Farm Act*
- As a “federally regulated narcotic”
  - Not eligible for federal/provincial agricultural support programs
  - Not eligible for property assessment/tax benefits (Ministry of Municipal Affairs and Housing/ Ministry of Finance)

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# **Cannabis and Agriculture**

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# **Cannabis and Agriculture**

Ministry of Agriculture  
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# **Cannabis and Agriculture**

Ministry of Agriculture  
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# **Cannabis and Agriculture**

Ministry of Agriculture  
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# Regulation of Cannabis: Agricultural Policy Decisions

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# **Regulation of Cannabis: Agricultural Policy Decisions**

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# Regulation of Cannabis: Agricultural Policy Decisions

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# Regulation of Cannabis: Agricultural Policy Decisions

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# **Regulation of Cannabis: Agricultural Policy Decisions**

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# **Cannabis and Agriculture**

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# **Cannabis and Agriculture**

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Cabinet Submission

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# **Cannabis and Agriculture**

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# **Cannabis and Agriculture**

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# **Cannabis and Agriculture**

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# **Cannabis and Agriculture**

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# **Cannabis and Agriculture**

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# **Cannabis and Agriculture**

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Name of Legislation	Current State in relation to production for medicinal use	s.12;s.13
<p>Agricultural Land Reserve Use, Subdivision and Procedure Regulation (ALRUSPR)</p> <p>under the:</p> <p><i>Agricultural Land Commission Act</i> (ALCA)</p>	<p>The ALRUSPR prescribes that the production of marihuana in accordance with the Marihuana for Medical Purposes Regulations, SOR/2013-119 (Canada) is designated as a permitted farm use in the ALR.</p> <p>The ALRUSPR provides that local governments may not make bylaws prohibiting the production of marihuana for medical purposes in accordance with the federal regulations (exception: if the local government is a regulated community under s. 553 of the <i>LGA</i>).</p> <p>There are currently concerns that cannabis production for medicinal purposes should not be taking place on prime Zone 1 ALR land. The facilities are very industrial and the product can be grown anywhere as there is no requirement for natural soil, light or climate.</p> <p>Further, federal medicinal regulations require that the facility be built prior to applying for a license – if the license isn't</p>	

	<p>granted, then the building is on ALR land and there is desire to carry out alternate activity to recover costs.</p>
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s.12;s.13

	s.12;s.13
<i>Local Government Act (AGRI sections only)</i>	<p>Local governments that want to restrict or prohibit the farm use of land in farming areas, beyond what's contained in the Minister's Bylaw Standards, must receive the Minister's approval and become a regulated community under s. 553 of the <i>LGA</i>.</p> <p>There are currently four regulated communities: Township of Langley, Abbotsford, Delta, and Kelowna.</p>
Minister's Bylaw Standards	The Minister's Bylaw Standard for



	<p>Medicinal Marihuana Production establishes the limits to which local governments can restrict the production of cannabis in the ALR, and provides local governments with ready to use bylaw provisions.</p> <p>For example, these particular bylaw standards prescribe minimum setback distances, maximum lot coverage and height requirements, and storm water and agricultural liquid waste management plans.</p> <p>Regulated communities under s. 553 of the <i>LGA</i> are <i>expected</i> to amend their bylaws to be consistent with Minister's Bylaw Standards.</p> <p>Local governments that are not regulated communities are encouraged to adopt the Minister's Bylaw Standards.</p>	s.12;s.13
<i>Farm Practices Protection (Right to Farm) Act</i>	<p>BCFIRB hears nuisance complaints to determine what constitutes "normal farm practice".</p> <p>To date, no complaints have been received regarding medicinal</p>	

	cannabis production. s.12;s.13
<i>Natural Products Marketing Act (NPMA)</i>	<p>The NPMA provides for the promotion, control and marketing of natural products. The Act gives powers to the BCFIRB, which has general supervision of marketing boards and commission established under the NPMA.</p> <p>The LGiC may establish schemes for the promotion, control and marketing of natural products.</p> <p>"natural product" means a product of agriculture or of the sea, lake or river and an article of food or drink wholly or partly manufactured or derived from such product.</p>

# Cannabis on the ALR Working Group Terms of Reference

**Project:** Cannabis Production on the ALR

**Ministry:** Ministry of Agriculture

## Purpose

The Cannabis on the ALR Working Group members will provide expertise to inform the regulatory parameters for soil based cultivation of cannabis on the ALR.

## Duration and Frequency

The duration of this working group is approximately 2 weeks. 1-2 meetings per week for approximately 1.5-2 hours/meetings. The meetings should take place in person if possible or via video conference.

## Accountabilities

The Cannabis on the ALR Working Group members will:

- Attend all working group meetings;
- Support development of regulatory recommendations through engagement, discussion and provision of expertise.
- Provide a final recommendations report.

## Membership

### Name

s.15;s.19

### Role

Chair and Inter-ministry working group member  
Working Group member  
Working Group member  
Working Group member  
Working Group member  
Working Group member  
Working Group member  
Working Group member

# Non-medical Cannabis Legalization and Regulation

Project Overview

s.15;s.19

Ministry of Agriculture  
June 23, 2017

# Purpose

- To provide an overview of the Provincial implementation plan for legalization and regulation of cannabis and the role of the Ministry of Agriculture within the broader provincial plan.
- To gain strategic guidance and advice on proposed process of implementation plan for the Ministry.

# Cannabis Legalization and Regulation

- Federal Role
  - Federal government will licence producers and set industry standards for both medical and non-medical cannabis.
  - Federal will retain oversight of distribution and retail of medical cannabis.
- Provincial Role
  - Provinces will oversee and licence distribution and retail of non-medical cannabis.
  - Provinces have a role to set requirements related to taxation, road safety, and minimum age for purchase of non-medical cannabis.

# Provincial Implementation

- A Secretariat has been established to proactively develop an implementation plan for non-medical cannabis.
- The Province has two goals:
  - Primary Provincial goal of implementation are focused on public health and safety.
  - Secondary goal is economic development.
- Two key phases of implementation:
  - Phase 1: Regulatory framework for decriminalization – July 2018.

s.12;s.13

# Ministry of Agriculture Role

- Ministry of Agriculture has a role in the production of non-medical cannabis, including land use and economic development.
- Decisions to be made in the Provincial context:

s.13



# AGRI Cannabis Working Group

## Terms of Reference

- Purpose: The AGRI Cannabis Working Group members will provide guidance regarding issues and roles of Ministry of Agriculture in the implementation of non-medical cannabis legislation. The Working Group supports and informs deliverables for the Cannabis Secretariat.
- Meeting Duration and Frequency: 1-1.5 hour/meetings, every one to two weeks or as needed until cannabis implementation project is completed or working group is dissolved.

# AGRI Cannabis Working Group

## Terms of Reference

- Accountabilities:

The AGRI Cannabis Working Group members will:

- Attend working group meetings;
- Receive Secretariat updates and provide branch/unit update to working group;
- Support development of policy and program recommendations through engagement, discussion and provision of expertise; and
- Assist chair in determining next steps for cannabis implementation and implementation timelines.

# AGRI Cannabis Working Group

## Terms of Reference

- Membership:

Participating Working Group members

s.15;s.19

# Completed Work

- Established Working Group
- High level scoping of Ministry impacts and resources

• s.13

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# Ongoing Work

- Continued support for the Secretariat (e.g. stakeholder consultation)
- Economic Development
- AGRI implementation plan (i.e. Planning Document)

# DISCUSSION

**Date:** May 1, 2017

**Title:** Implementation of Non-Medical Cannabis in British Columbia

**Problem Statement:**

The Federal government has tabled proposed legislation to legalize and regulate non-medical cannabis. Legalization presents an economic opportunity for B.C.'s agriculture sector; it also raises a range of concerns that will need to be addressed through implementation planning. The questions that must be addressed are: s.13  
s.13

**Background:**

On April 13, 2017, the federal government introduced proposed legislation to legalize cannabis for non-medical use. At the provincial level, the B.C. Cannabis Legislation and Regulation Secretariat, whose membership includes the Ministry of Agriculture, was created to guide the implementation and regulation of non-medical cannabis from a whole-of-government perspective. While this work is focused on ensuring implementation supports federally-identified public health and safety objectives, it also includes as a secondary consideration, how to achieve the potential economic opportunity of non-medical cannabis legalization.

Canada has a long-standing legal medical marijuana industry, dating back to 2001, as well as a significant illicit cannabis market. B.C. has one of the largest illicit cannabis industries in Canada. B.C.'s industry is estimated to have doubled in size between 2003 and 2010, and has an estimated value of hundreds of millions of dollars. Given the existence of a large illicit Cannabis industry, there could be a sizable market for a legitimate non-medical cannabis industry in B.C.

To identify the potential economic opportunity for the legalization of non-medical cannabis in B.C., it is important to understand the new federal legislation, B.C.'s experience with medical marijuana, and the potential implications of implementing the legalization of cannabis for recreation or non-medical cannabis in B.C.

Federal Legislation

Since 2001, there have been three federal regulations for medical marijuana:

- Marihuana Medical Access Regulations (MMAR) which enabled a dual system of licensed individuals who were authorized to produce medical marijuana for personal consumption or to designate another individual to do so on their behalf;
- Marihuana for Medical Purposes Regulation (MMPR) was meant to revoke the MMAR licences and create a system of large-scale licensed commercial growers, of which nine are located in B.C. (The current number of producers on the ALR is unknown). However, due to a court ruling the MMAR licences were not revoked; and
- Access to Cannabis for Medical Purposes Regulation (ACMPR), which carried forward the MMPR commercial production licenses as well as enabled small-scale personal production with restrictions on the number and size of plants. MMAR licences continue under the ACMPR.

The MMPR was intended to replace the licensing system created under the MMAR, and revoke the licenses issued under it. However, a court ruling in 2016 allowed MMAR licenses to continue on an interim basis. Under the federal legislation, the federal Minister of Health is responsible for: issuing licenses for the production of medical marijuana; including the requirements license holders must comply with; setting national standards for health and safety; and establishing criminal prohibitions.

The newly tabled *Cannabis Act* (Act) will establish a legal non-medical cannabis system, including regulating its production, distribution, retail and possession. The non-medical cannabis system will operate in parallel with the existing medical marijuana system and according to the federal government will be re-evaluated in five years.

The federal government will continue to license cannabis producers, set national standards for health and safety, and establish criminal prohibitions. The federal government has indicated there will be no restrictions on the number of production licenses that can be issued in a province and all previously-issued medical cannabis licenses will be carried forward under the new Act. The proposed legislation will also remove cannabis from the list of substances classified as a narcotic.

Legal forms of cannabis that will be allowed for production, distribution and sale will include: dried cannabis, cannabis oil, fresh cannabis, cannabis plants and cannabis seeds. The federal government has indicated that the selling of edible cannabis products will not be permitted. The import and export of non-medical cannabis will not be permitted. The federal government has further indicated that there will be no inherent federal barriers to transporting cannabis between provinces and territories, and the federal government will work with provinces and territories to determine conditions of inter-provincial trade following Royal Assent of the Cannabis Act.

Provinces would be responsible for overseeing distribution and retail sale of cannabis (but not its production) and subject to minimum federal conditions (e.g. minimum age for legal consumption). The legislation also enables provinces to tailor rules to their own needs and priorities (e.g. higher age for legal consumption, local zoning bylaws for cannabis-related businesses).

s.13



Medical Marijuana				Cannabis Act		
Area	Federal	AGRI	Province	Federal	AGRI	Province
<b>Production</b>	Issue authorizations	Land use decisions for the ALR	Exempt from farm class status	Issue authorizations	s.13	
	Compliance with terms of authorizations	Minister's Bylaw Standards		Compliance with terms of authorizations		
	Other authority in regulation	BCFIRB normal farm practice complaints		Other authority in Act and future regulation		
	Continues as a narcotic	Role in with minor use pesticide registrations		No longer a narcotic		
		Provision of general plant diagnostic services				
<b>Distribution</b>	Federal	N/A				
<b>Retail</b>	Federal	N/A				
<b>Public Safety and Enforcement</b>	Federal	N/A		Federal		
<b>Health</b>	Federal	N/A		Federal		
<b>Education and Public Awareness</b>	N/A	Regional agrologist dispute resolution				

### B.C.'s Approach to Medical Marijuana

The main levers in B.C. to influence the economic development of the non-medical cannabis industry include legislation, program supports and stakeholder relationships. This section describes how B.C. used these levers in relation to medical marijuana within the existing federal licensing schemes.

#### *Legislation*

In May 2015, the Province amended the Agricultural Land Reserve Use, Subdivision and Procedure Regulation (ALRUSPR) to designate the production of medical marijuana in accordance with the federal MMPR as a 'farm use' in the Agricultural Land Reserve (ALR). Prior to this both British Columbia Agricultural Commission (BCAC) and ALC communicated their own views that medical marijuana should be considered a 'farm use'.

As a designated farm use, medical marijuana was considered a farm operation under the *Farm Practices Protection (Right to Farm) Act* (FPPA). This means that medical marijuana producers are protected from nuisance complaints (e.g. noise, dust, odour) if they are found to be operating according to normal farm practices, as determined by the B.C. Farm Industry Review Board (BCFIRB). As of April 2017, no complaints have been received, nor has BCFIRB established what 'normal farm practices' means for cannabis producers.

Through the *Local Government Act* (LGA), the province has delegated authority to make zoning bylaws to local governments. As a designated farm use, local governments have the ability to regulate – but not prohibit – medical marijuana production in the ALR.

The fact that medical marijuana is an acceptable farm use does not mean that it receives all the benefits associated with farming. In 2014, the Province amended the Classification of Land as a Farm Regulation, under the *Assessment Act*, to exclude production of federally regulated narcotics (which currently includes medical marijuana) from qualifying for farm classification and accessing the advantageous property assessment and tax benefits that flow from this classification. The rationale was that medical marijuana production came with increased service requirements (police, fire, etc.) and that local governments would need tax revenue to support these services.

#### *Program Supports*

The Ministry of Agriculture currently has a minor role with respect to assisting medical marijuana producers. The ministry has helped the medical marijuana industry address community complaints about medical marijuana facilities, assisted with minor use pesticide registrations and provides general plant diagnostic services.

No program funding has been available to the industry; the federal government identified the sector to be ineligible for the Growing Forward 2 federal provincial cost-shared funding agreement, and the sector cannot access other Ministry's programs that support the development of agriculture sector.

To guide local governments in developing zoning bylaws for medical marijuana production facilities in the ALR, the Minister of Agriculture published the Minister's Farm Bylaw Standard for Regulating Medical Marijuana Production Facilities in the Agricultural Land Reserve. Ministry land use planning staff continues to engage local governments to encourage consistency with the Minister's Bylaw Standard and local governments are aware that they cannot ban medical marijuana production.

#### *Stakeholder Reaction*

Many local governments (e.g. Chilliwack, Courtney) have expressed significant concern about and frustration with the province's approach to medical marijuana production. The legal status of and enforcement authority over medical marijuana operations is complicated and local governments are often

on the front line of addressing community complaints. Communities have expressed concerns about: how some designated producers have accumulated multiple MMAR licenses which implies there are large-scale grow operations in the ALR; their inability to ban medical marijuana production within their local boundaries; possible industry links to organized crime; and the absence of established farm practice standards. Concerns have also been raised about the impact of disturbing agricultural land to construct the bunker-like growing facilities required under the MMPR and ACMPR. If medical marijuana was required to be grown on industrial land, local governments would have greater authority to prohibit or restrict this activity.

Local governments have developed medical marijuana bylaws, of which approximately 90% are in compliance with the guidelines provided by the Minister's Bylaw Standard. The Ministry continues to work with the remaining local governments who have in effect restricted or prohibited medical marijuana production (e.g. overly restrictive setback requirements, re-zoning and/or minimum lot size requirements) but a Minister's Bylaw Standard is not enforceable.

#### **Jurisdictional Scan:**

As of April 2017, non-medical cannabis is legal in Uruguay and several U.S. states (i.e. Colorado, Washington State, Washington D.C., Oregon, Nevada, California, Massachusetts, Maine, Alaska). In the U.S. cannabis remains illegal at the federal level.

Key findings from the experience of these jurisdictions include:

- In general jurisdictions have focused efforts on regulation opposed to economic development of the non-medical cannabis industry.
- Jurisdictions which began by implementing a restrictive approach to non-medical cannabis and gradually loosened restrictions over time have had an easier time making legislative changes than jurisdictions that attempted to tighten restrictions at a later date.
- Non-smokeable forms of cannabis are growing in popularity. Edible products and concentrates account for almost half of the U.S. non-medical cannabis market.
- Many jurisdictions have not yet enabled farm tax advantages for non-medical cannabis (e.g. Washington State).
- Jurisdictions have made varied regulatory decisions with regards to indoor, controlled-climate versus outdoor, open field production. Colorado prohibits outdoor production but is developing best practices to mitigate concerns over energy and water use associated with indoor production. Alaska permits outdoor production.

#### **Analysis and Options:**

As the province works to implement the *Cannabis Act*, it is expected that the local government and stakeholder concerns identified above will carry forward and, if not addressed, will reduce the potential economic opportunities available. The Ministry has decisions to make that will determine the economic growth of the cannabis industry.

#### *Legislation*

The new federal legislation framework that outlines the expectation for provinces to manage distribution and retail will require the Province to review the legislative framework in which licensed cannabis producers would operate. As the *Cannabis Act* removes cannabis from the narcotics list, B.C. will have to review its current approach of excluding cannabis production from the current system of farm tax benefits. Unless the Classification of Land as a Farm Regulation is amended, cannabis will qualify as an agricultural product for property assessment purposes.

There are currently nine Commercial Growers with MMPR licences in B.C. and it is unknown how many are on the ALR. Additionally, in order for producers to receive a MMPR licence certain building and security specifications had to be met. The result was large industrial bunkers on ALR which in some cases were later not approved for Commercial Grower Licences under the MMPR and continue to be vacant. The current number of vacant bunkers on the ALR is unknown in part because licenced producers are not required to inform the province of their location and current understand is that the province has not formally requested this information from the federal government.

Assuming there are producer profits associated with Cannabis, this could result in displacement of other types of agricultural production (e.g. food crops, livestock) and encourage the use of prime agricultural land as the location of controlled-environment production (bunker type) facilities. As an identified farm use, all cannabis producers would also continue to have protection under the FPPA.

The dual system of licensed individuals who were authorized to produce medical marijuana for personal consumption or to designate another individual to do so on their behalf, has resulted in multiple large scale grow-ops throughout the province with minimal security or farm practice standards, increasing the risk of environmental degradation and nuisance complaints related to odour. In 2012, there were approximately 2,200 designated producers in B.C. The current number of designated producers on the ALR is unknown.

Similarly, if the Province continues to classify federally-licensed cannabis production as a designated farm use under the ALRUSPR, and there are no federal restrictions on the number of potential production licenses that could be issued in B.C., cannabis production facilities (bunkers, greenhouses) could proliferate within the ALR.

#### *Program Supports and Services*

The Ministry and the federal government also face decisions regarding access to programs and services that would support the economic growth of the non-medical cannabis industry. The removal of cannabis from the narcotics list and recognition of cannabis as an agricultural crop could mean cannabis was eligible for a broader range of Ministry and federally funded programs and services but for some situations federal legislation will continue to impact program eligibility. For example, the ministry will likely have to make decisions about access to domestic market supports, innovation funding and access to regional agrologists and industry specialists, while access to food programs would be effectively prohibited until the sale of cannabis edibles was permitted, and access to international marketing programs could not occur until the export of cannabis was legal. Other stakeholders will likely express major concerns about the Cannabis industry accessing existing programs as their presence would be competition for finite program funding. Funding the sector may also meet with general public opposition to expending government funding on a previously illicit and highly lucrative industry.

#### *Stakeholders*

Local government support will be important to the Province's ability to achieve the economic opportunity presented by legalization. Some local governments will oppose production of cannabis in the ALR while others may want to realize revenue from a potentially lucrative industry, if the tax benefits for non-medical cannabis are aligned with other agricultural crops.

#### *Implementation Questions*

Within the *Cannabis Act* the sections applicable to production are very broad. Therefore, unless otherwise indicated by the eventual federal regulations, the Ministry will need to determine their direction on the following questions:

1. Does the Ministry treat non-medical cannabis the same as medical marijuana within provincial legislation?
2. To what extent does the ministry provide program support and services?

s.12;s.13

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s.13

Page 0663 of 1060 to/à Page 0668 of 1060

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s.13; s.16

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Withheld pursuant to/removed as

s.13; s.14; s.16



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s.13

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Withheld pursuant to/removed as

s.13; s.16

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s.13

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s.12; s.13

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s.12; s.13; s.14

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s.13; s.16

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s.13; s.16

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s.12; s.13

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s.12; s.13

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s.12; s.14



## Cabinet Submission – Request for Decision

**Minister:** s.15;s.19

**Ministry:** Ministry of Agriculture

**Date:** DD/MM/YYYY Ministry Document #:

**Title:**

s.12;s.13

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s.13; s.12



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s.12; s.13

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s.12; s.14



# Cabinet Submission – Request for Decision

**Minister:** s.15;s.19

**Ministry:** Ministry of Agriculture

**Date:** DD/MM/YYYY Ministry Document #:

**Title:**

s.12;s.13

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s.12; s.13

Page 0717 of 1060 to/à Page 0718 of 1060

Withheld pursuant to/removed as

s.12; s.14



## Cabinet Submission – Request for Decision

s.15;s.19

**Minister:**

**Ministry:** Ministry of Agriculture

**Date:** DD/MM/YYYY

Ministry Document #:

**Title:**

s.12;s.13

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s.12; s.13

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s.13; s.12



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s.12; s.14

**DRAFT NOTES from  
Cannabis Production in the Agricultural Land Reserve: Local Governance Discussion**

**Monday, April 30, 2018; 1:00-3:00pm  
1<sup>st</sup> floor boardroom, Ministry of Agriculture, 808 Douglas Street, Victoria BC**

**Meeting Attendees**

**Ministry of Agriculture**  
s.15;s.19

**Ministry of Municipal Affairs and Housing**  
s.15;s.19

**Agricultural Land Commission**  
s.15;s.19

**Union of BC Municipalities**

Local Government Program Services: Danyta Welch

Community Safety Policy: s.22

Local Government Staff (also members of the Joint Provincial-Local Government Committee on Cannabis Regulation):

Peter Monteith, CAO, City of Chilliwack

Dave Jones, Business Licence Inspector, City of Kamloops

**Provincial Cannabis Secretariat/Joint Provincial-Local Government Committee on Cannabis Regulation**  
s.15;s.19

PSSG

**DRAFT Discussion Notes:**

s.13;s.16

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**DRAFT NOTES from  
Cannabis Production in the Agricultural Land Reserve: Local Governance Discussion**

**Monday, April 30, 2018; 1:00-3:00pm  
1<sup>st</sup> floor boardroom, Ministry of Agriculture, 808 Douglas Street, Victoria BC**

s.13;s.16

**MINISTRY OF PUBLIC SAFETY AND SOLICITOR GENERAL  
MINISTRY OF JUSTICE AND ATTORNEY GENERAL**

**DECISION NOTE**

**PURPOSE:**

For UPDATE and DECISIONS.15;s.19 Public  
Safety and Solicitor General,s.15;s.19 Attorney General.

**BACKGROUND:**

The purpose of this note is to create a record of decisions related to cannabis legalization made at a \*date\* briefing of the Solicitor General and Attorney General.

The decisions concern the treatment of cannabis production in the agricultural context, and are approved by s.15;s.19 Forests, Lands, Natural Resource Operations and Rural Development (standing in for the s.15;s.19 Agriculture on the cannabis file). See attached decision notes.

**ISSUES DECIDED:**

s.13

s.13

**DECISIONS APPROVED / NOT APPROVED****DATE:**

s.15;s.19

s.15;s.19 Public Safety and Solicitor General

**DECISIONS APPROVED / NOT APPROVED****DATE**

s.15;s.19

s.15;s.19 Attorney General

**Prepared by:**

s.15;s.19

s.15;s.19, Cannabis Legalization  
and Regulation Secretariat  
Policing and Security Branch  
Ministry of Public Safety and Solicitor  
General

**Approved \*date\* by:**

s.15;s.19

Policing and Security Branch  
Ministry of Public Safety and Solicitor  
General

**Recommended \*date\* by:**

s.15;s.19

s.15;s.19, Cannabis Legalization  
and Regulation Secretariat  
Policing and Security Branch  
Ministry of Public Safety and Solicitor  
General

**Approved \*date\* by:**

s.15;s.19

Liquor Control and Licensing Branch  
Ministry of Attorney General

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s.12; s.13; s.14

#	Ministry/Org	Theme	Sub-theme	Question	Answer/Response
					s.13;s.16
1.	Secretariat	Licences/ Authorizations		Assuming distribution allows purchasing in bulk, would there be restrictions on repackaging by retailers?	
2.	Secretariat	Licences/ Authorizations		Can a processor sell to a provincial retailer? Or, do they have to sell to a provincial distributor first? The discussion paper simply says "provincially authorized seller".	
3.	MAH	Licences/ Authorizations	Application Process	What interface, if any, will exist between processes for approving cannabis production and processing licences and local land use approvals?	
4.	Secretariat	Licences/ Authorizations		Will there be any federal restrictions on a federally-licensed producer/processor obtaining a provincially-issued retail licence (if the Province chooses to issue such a licence)?	
5.	Secretariat	Licences/ Authorizations	Research	Please provide more information about the research authorizations. We need more information to know if any restrictions with respect to minors ought to be contemplated. There will be provincial restrictions on the employment of minors by federal licence holders.	
6.	FIN	Licences/ Authorizations	Validity Period	Proposed licence period is five years; what's the licence renewal process?	



#	Ministry/Org	Theme	Sub-theme	Question	Answer/Response
					s.13;s.16
7.	AGRI	Licences/ Authorizations	Good Practices	How many samples would have to be tested per crop / batch?	
8.	AGRI	Licences/ Authorizations	Good Practices	What is the process for reporting failed analytical tests? Is the Minister notified? Would PTs be notified?	
9.	AGRI	Licences/ Authorizations	Good Practices	Will the federal government be gathering scientific evidence with respect to production and good production practices that will be shared with the provinces?	
10.	AGRI	Licences/ Authorizations	Record Keeping and Reporting	Who would be responsible for monitoring record keeping and how (i.e. onsite or off site)?	
11.	AGRI	Products/ Product Standards	Product Classes	Will all of these products be classified as regular agriculture or food products?	

#	Ministry/Org	Theme	Sub-theme	Question	Answer/Response
12.	Secretariat	Packaging & Labelling		Section 6.2 says that the maximum packaged amount for cannabis oil is 2.1 litres. Going by the 5.2.2 prescribed limit of 30mg/mL, then, a 2.1 litre bottle of oil would contain 63 grams of pure THC. Assuming an average cannabis THC potency of 10%, that would mean the 2.1 litre bottle would contain the equivalent of 630 grams of dried cannabis.	s.13;s.16
13.	HLTH	Medical Access		Is the federal government taking steps to avoid incentivizing people to become patients to take advantage of medical cannabis rules such as production or possession of large amounts of cannabis?	
14.	AGRI	Medical Access	Information Sharing	What information related to medical cannabis licences does the federal government intend to share with provincial and territorial governments?	
15.	HLTH	Health Products	Non-prescription products	Can more information be provided on the anticipated differences between non-prescription products and NHPs? Are there THC concentration limits on non-prescription products? What is permitted for this type of product?	
16.	Secretariat	Miscellaneous		Page 66: What will the regulations say regarding the qualifications for analysts?	
17.	HLTH	Health Products	Prescriptions	What is the rationale for excluding other health professions such as dentists, midwives, and podiatrists? Do you plan to expand the range of professions that can prescribe cannabis? If not, why not? Would it be more appropriate to leave that decision with the provinces?	

#	Ministry/Org	Theme	Sub-theme	Question	Answer/Response
18.	Secretariat	Licences/ Authorizations		The Bill C-45 definition of distribute includes “administering” in addition to giving, transferring etc. What did the federal government intend to capture in “administering”?	s.13;s.16
19.	LDB	Supply		Will Health Canada take any steps to address potential supply shortages?	
20.	MIRR	Miscellaneous		What are the Federal Government’s objectives with respect to the regulation of production of cannabis on Indian Reserves, would it be a. controlled by bands under the Indian Act? b. include specific regulation of commercial production on reserve?	
21.	LDB	Packaging & Labelling	Requirements	Do you have any more information about anticipated packaging and labelling requirements, and do you have an update on when final details on both packaging and licence types will be available?	
22.	LDB	Licences/ Authorizations	Requirements	Will LPs require a separate licence for each location, as they currently do for medical cannabis production?	
23.	HLTH	Licences/ Authorizations	Testing	What third party testing of products for pesticide contamination will be applied, and will this vary depending on of the size of the producer/processor?	

#	Ministry/Org	Theme	Sub-theme	Question	Answer/Response
24.	HLTH	Licences/ Authorizations	Testing	How will in-house analytical testing conducted by producers/processors be monitored to certify and to ensure use of valid and reliable methods and that testing is used consistently?	
25.	AGRI	Licences/ Authorizations	Notification	Will HC take any steps to ensure that applicants satisfy any requirements of provincial and local governments such as (give examples) before issuing a licence? Will the terms and conditions of an LP licence require compliance with local or provincial laws, and what will be the process where an LP is not in compliance?	s.13;s.16
26.	Secretariat	Information Sharing		What is the anticipated scope of section 83? Do you foresee any limits on what information would be shared with provinces?	
27.	Secretariat	Personal Cultivation		How are you interpreting “ordinarily resident” and can a person be ordinarily resident in two places? E.g., if I have a downtown TO condo and a cottage where I spend weekends and sometime in the summer, can I grow my four plants outside a the cottage? If a couple has two residences as above, can each grow four plants at one of the two residences?	
28.	Secretariat	Miscellaneous		Where a person who works for a common carrier is in possession of >30 grams but not aware of it, e.g., is carrying more than one individual 30 gram package sent by an individual to friend, does the criminal sanction not apply because there is no “guilty mind”?	

#	Ministry/Org	Theme	Sub-theme	Question	Answer/Response
29.	Secretariat	Products/ Product Standards	Product Classes	<p>What does “represented to be used in the consumption of cannabis” mean in the definition of cannabis accessory? When/how will a representation be considered to be made?</p> <ul style="list-style-type: none"><li>• Is it because the thing is sold with cannabis (regardless of how it is packaged, marketed or marked)</li><li>• Is it because the thing has a specific mark indicating that it is to be used in the consumption of cannabis</li><li>• Both</li><li>• Either – something else entirely</li></ul>	s.13;s.16
30.	Secretariat	Products/ Product Standards		<p>Item 2 of Schedule 1 (included in definition of cannabis) is:</p> <p>Any substance or mixture of substances that contains any part of a cannabis plant – is this intended to include any product that contains any form of cannabis (e.g. when edibles become legal are things like cannabis infused potato chips considered a “substance” and caught by the definition of cannabis? What about cannabis infused feminine hygiene supplies?</p> <p>Any substance or mixture of substances that has on it any part of a cannabis plant - same question, is this intended to include any product that has cannabis on it?</p>	

#	Ministry/Org	Theme	Sub-theme	Question	Answer/Response
31.	Secretariat	Products/ Product Standards		Please give more information about why it's necessary to distinguish between substances/mixtures of substances that contain cannabis, and those which have cannabis on them.	s.13;s.16
32.	Secretariat	Retail Sales	Advertising & Promotion	In developing an online sales platform, BC is grappling with what steps it has to take to avoid breaching the Bill C-45 restrictions on advertising and promotion. For the federal government's backstop online sales program, will LPs be required to engage in an age verification process before a prospective customer can view "promotional" information (anything beyond price and availability). Note that this information is currently available on LP websites without the need to confirm in any way that the reader is 18 or older.	

Hjs.15;s.1 s.13

. The Guide for Bylaw Development in Farming Areas, 2015 does provide provisions that local governments could enact under zoning bylaws for buffering and setbacks for Medical Marihuana Production Facilities (MMPF). See Pages 21 and 22 of the Guide, link below.

[https://www.alc.gov.bc.ca/assets/alc/assets/library/land-use-planning/guide\\_for\\_bylaw\\_development\\_in\\_farming\\_areas\\_2015.pdf](https://www.alc.gov.bc.ca/assets/alc/assets/library/land-use-planning/guide_for_bylaw_development_in_farming_areas_2015.pdf)

"Because the buildings are deemed farm buildings there are no provisions for ensuring a livable distance from neighbouring homes, property lines no requirement for screening fencing nor odour control and the water for o other small mixed farms are in question on this unincorporated water system."

However despite the setback allowances under the Ministers Bylaw Standard in the Guide the issue of odour would be considered nuisance and have to be part of a Farm Practice complaint unless the Federal regulations spells out mitigation and compliance under the ACMPR.

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A few comments further to s.15;s.19 email:

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- Also, from ACMPR Part 2:
    - Location and type of production
- 193 (1) A person who is authorized by a registration to produce cannabis

(a) may only produce marihuana plants at the authorized site for the production of marihuana plants;

- Cancellation of registration

197) Subject to section 198, the Minister must cancel a registration if

(a) the registered person is not eligible under section 174;

(b) the designated person is not eligible under section 176;

(c) the registered person or designated person has contravened section 193

- I read this to mean they must notify Health Canada if they move. I don't read any mechanism however that would require a 'designated person' to switch to becoming a 'licensed producer' (with its additional requirements), if they notified Health Canada appropriately of the move.
- In terms of siting however, it does point to that (ACMPR 177 4(e)) "the application must also include... if the proposed production area involves outdoor production entirely or partly indoor and partly outdoor production, an indication that the production site is not adjacent to a school, public playground, day-care facility or other public place frequented mainly by persons under 18 years of age;" (5a) s.13
- See s.15;s.1 follow up email to Ramona on his hope "that licensed recreational marijuana production will be communicated in the near future as the requirements for medical marijuana facilities include several setback, air quality and security requirements that should serve to insulate licensed businesses from residential areas."

s.15;s.19  
Hi

s.15;s.19 has had similar correspondence with Ramona Faust recently concerning medical marijuana production in ALR.

s.15;s.1 - did you follow up further with Ramona? Could you take a look at Ramona's email - it looks like the same issue. Do you have any further thoughts on this one?

The way I read Ramona's email is that for this one case, the MMAR licensee wants to move to a new address. I would have to look at the ACMPR in further detail, but I think there are now ACMPR rules that Health Canada requires notification of that new address - and could require additional obligations for these 'designated producers' for the new facility that might improve the concerns about fencing, odour and water usage? Is it at Health Canada's discretion?

s.13

s.15;s.19

British Columbia Ministry of Agriculture  
Phones.15;s.19

@gov.bc.ca

-----Original Message-----

From:s.15;s.19 AGRI:EX

Sent: Thursday, February 1, 2018 9:28 AM

To:s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX

Cc:s.15;s.19 AGRI:EX

Subject: FW: Cannabis Secretariat follow-up



Hellos.15;s.19

Can you please review Ramona Faust's email below for accuracy and provide at least a partial response by end of day? By partial I mean if you require more time to respond just let me know.

Thanks, s.15;s.19

-----Original Message-----

From: s.15;s.19 AGRI:EX  
Sent: Thursday, February 1, 2018 9:19 AM  
To:s.15;s.19 PSSG:EX  
Cc:s.15;s.19 AGRI:EX  
Subject: RE: Cannabis Secretariat follow-up

Hi |s.15;s.1  
s.13 ^

I will follow-up again at end of day.

s.15;s.1  
Thanks,g  
Hi s.15;s.19

A few initial bullets for your consideration:

- Here's the Strengthening Farming Program [webpage](#) on OCP Development Permit Areas for the protection of farming. There's a linked example from Nanaimo as well. *Local Government Act* section 491(6) states that they may be applied to "provide for the buffering or separation of development from farming on adjoining or reasonably adjacent land." I would anticipate (and

encourage) however that a local government pursuing to adopt such an OCP amendment would do so in a long-term and all-inclusive manner for the benefit of agriculture, rather than a site specific approach.

- I'd also suggest clarifying that Minister's Bylaw Standards are not regulations, they're more like guidelines that the Ministry encourages local governments to employ when they're developing their own bylaws. From *Local Government Act* Section 551.
- I did a search on BCFIRB's website and found their April 2017 Adjournment Decision which references cannabis farm practices and odour which I hadn't read yet. If you haven't seen it, it's located here: [https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/organizational-structure/boards-commissions-tribunals/bc-farm-industry-review-board/farm-practices/complaint-decisions/preliminary-decisions/2017\\_apr\\_20\\_-\\_kaye\\_et\\_al\\_v\\_chang\\_yu\\_xu\\_adjournment\\_decision.pdf](https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/organizational-structure/boards-commissions-tribunals/bc-farm-industry-review-board/farm-practices/complaint-decisions/preliminary-decisions/2017_apr_20_-_kaye_et_al_v_chang_yu_xu_adjournment_decision.pdf)

s.15;s.19

British Columbia Ministry of Agriculture

Phone: s.15;s.19 @gov.bc.ca

**From** s.15;s.19 AGRI:EX  
**Sent:** Friday, November 17, 2017 4:22 PM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** Fwd: Intensive Indoor Agriculture

What I wrote, then learned from Ramona. I'll talk to s.15 next week and follow up with you the following week. s.15;s.19 Any ideas or suggestions you have are welcomed.

s.15;s.19

Begin forwarded message:

**From:** Ramona Faust <RFaust@rdck.bc.ca>  
**Date:** November 17, 2017 at 5:09:05 PM MST  
**To:** s.15;s.19 AGRI:EX s.15;s.19 @gov.bc.ca>  
**Subject:** Re: Intensive Indoor Agriculture

Thank you for your reply. I have been learning more since I wrote so apologies for being vague.

RDCK Area E doesn't have zoning.

I went through a 6 year process to create an official community plan which was established in 2014. The length of time was due to staff changes and internal re-prioritization and therefore zoning is not established.

The OCP contains Development Permits for industrial and riparian areas but none for ALR. land.

I hope to have staff develop a development permit for set backs and form and character that is acceptable to the ALC. and Ministry of Agriculture.

Directors have been instructed by staff that zoning is the only tool to guide MM facilities however page 16 and 17 of the Bylaw Standard Guide indicates that Development Permits can as well. Do you believe that to be correct?

The buildings are 2 and they are 40 by 80 structures which will be enclosed. They were too small to be of concern to the ALC but large enough to have an impact on land and water use.

There is a residence on the property which I am told makes it not eligible for licensing as indicated in the Bylaw Standard page 14.. \*\*\*This is a problem for small lot agriculture that has a primary residence and wants to grow licensed medical or recreational marijuana  
The west Kootenays have many 25 to 50 acre parcels with a house. on them and there are unzoned areas in 6 of the 11 electoral areas in the RDCK.

It is local knowledge that the proponent had a license under MAPR in a different community and perhaps is in the re-registration process. so ACMPR is not in place. I have not seen the file but RDCK planning staff confirmed there is no current MMPR. license.

We have no guidelines other than industrial building permit with code risk F3 on these buildings, one of s.22 . Between Right to Farm and no license under MMPR or ACMPR there are few tools. This is an unimpregnable way to set up marijuana production with no rules. to safeguard neighbours.

The current situation leaves the electoral areas without zoning in the position of becoming open to increasing unlicensed facilities again I fear. and with recreational use coming on stream it will only build.

Respectfully I hope the Ministry of Agriculture Solicitor General and ALC can assist Regional Districts in dealing with this phenomena and I will do what I can to make room for both licensed facilities and preserving homes and farms that are potentially affected.

The proponent was planning to use their domestic water license of 250 gallons on a creek that is small

and serves 9 or so houses. That was alarming to more than immediate neighbours. The waterusers are following up with that.

Thank you for your time.  
Ramona Faust  
Director  
Electoral Area E  
Regional District Central Kootenay

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: s.15;s.19 @gov.bc.ca>  
Date: 2017-11-17 12:38 PM (GMT-08:00)  
To: Ramona Faust <RFaust@rdck.bc.ca>  
Subject: Re: Intensive Indoor Agriculture

Hi Ramona

Regarding your email about Intensive Indoor Agriculture

"Subject: Intensive indoor agriculture

Dear AgriService BC

I have a number of questions regarding the use of ALR land for intensive industrial indoor agriculture and the ability to implement distances from lot lines of neighbouring property's residences also on ALR land.

A the elected director of a rural electoral area with an official community plan that contains an industrial development permit requirement I am trying to find a mechanism to bring comfort to neighbours who also farm fruit vegetables horses etc.

Despite the use on the application to our building department to which the ALC had no comment it is widely understood in the community that the intensive indoor agriculture will be cannabis and unlicensed. Two buildings equaling 14000 square feet are reported to be the installation.

I have read the Bylaw Standard and would like to understand the mechanism to address nuisance factors associated with the ALC permitted farm use of intensive indoor industrial agriculture such as noise and odour by creating appropriate distance and screening from adjacent households but am very clear the farm use is not prohibited.

Thank you for your assistance in this matter.”

My initial response:

I am not certain what questions you are hoping to have answered but offer the following suggestions:

I suggest the RDCK consider its existing zoning bylaws concerning construction of buildings within the ALR and seeing if these bylaws provide setbacks and screening requirements that will help address complaints or concerns of the property owners neighbouring this site. If the existing bylaws do not contain any guidance on building setbacks or screening then the RDCK could consider introducing a zoning bylaw that is consistent with the legal framework of the local government act and farm practices protection act to help reduce the chance for conflict between landowners.

I have several questions about the proposal that might help me understand the situation better. Are the proponents modifying existing buildings or building new structures? Are they planning to build greenhouses or structures fully dependent on artificial lighting? Do you believe that the proponents are hoping to grow and sell recreational rather than medicinal marijuana? Has the RDCK talked to the proponent about minimizing conflict with neighbours around issues of lighting, noise and odour?

The current Federal regulations concerning production of medicinal marijuana include several requirements that would help reduce conflict between neighbours and are likely a good starting point for anyone considering recreational marijuana production. Air scrubbing to reduce odours is required under the federal regulation concerning medical marijuana. The “Access to Cannabis for Medical Purposes Regulation” (ACMPR) is a good source of information on this topic.

As you indicate in your note the ALC has indicated that medical marijuana can be grown on ALR lands. The Ministry’s discussion paper and bylaw standard for medical marijuana production facilities in the ALR is found at: [https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/agriculture-and-seafood/agricultural-land-and-environment/strengthening-farming/local-government-bylaw-standards/medical-marihuana/medical\\_marihuana\\_discussion\\_paper\\_march\\_2\\_2015\\_final.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/agriculture-and-seafood/agricultural-land-and-environment/strengthening-farming/local-government-bylaw-standards/medical-marihuana/medical_marihuana_discussion_paper_march_2_2015_final.pdf) A range of possible setback distances from marijuana production facilities and other structures and boundaries is found on Page 17.

This discussion paper was written when the Federal Medical Marihuana Production Regulation was in force, it has since been replaced by the ACMPR regulation noted above.

If you have future questions for the Ministry of Agriculture that I can help with<sup>s.19</sup>

s.15;s.19      Region please feel free to write/call me directly.

Regards,

s.15;s.19                                      - BC Ministry of Agriculture  
s.15;s.19

## Implementation of Cannabis Regulations -Potential Issues for Ministry of Agriculture

	Issue	Identify Impact on Value Chain  (i.e. Cultivation, manufacturing, distribution, retail)	Impacts on Policy	Impacts on Legislation
1	Demand for time to work on minor use pesticide for the industry	Cultivation, production, possibly retail	s.13	Pest Management Regulatory Agency (federal)- pesticide registration is done at the federal level. Provinces have no involvement in the review of pesticides.
2	Local governments have authority to zone land use with exceptions and within certain parameters. Many local governments may want to regulate, restrict or prohibit cannabis production/manufacturing in their area.	Cultivation and manufacturing		ALCA and ALR regulations. Indirectly Local Government Act.  Impact will be dependent on what the new federal regulations are the existing provincial regulations are with regards to land use planning for agriculture.
3	Existing federal regulations on Medical marijuana. Question-How will changes to the federal regulations impact provincial regulations.	Cultivation and manufacturing		ALCA, ALR regulations and Local Government Act. Farm Practices Protection Act  Current ALR regulations are not up-to-date on the federal medical marijuana regulations (MMPR not ACMPR)  Question- Will new regulations allow for designated producers to continue or not?  If the new regulated allow designated producers to

## Implementation of Cannabis Regulations -Potential Issues for Ministry of Agriculture

				<p>continue then: normal farm practices, farm status and local government authority to regulated will need to be addressed.</p> <p>Question- would we need an amendment on right to farm? Answer-Probably not, but may need amendment to ALCA or ALR regulations.</p>
4	<p>Licences and production control-implies supply management. For any federal regulation put in place what provincial marketing boards will we be involved in regulation amounts?</p> <p>How will production controls and impact producers' decision to export?</p> <p>Note that exporting opens the door for import.</p>	Distribution	s.13	<p>NAFTA, CETA.</p> <p>s.13</p> <p>If there are regulations set for production amount then a licensing board may be required. (possibly Natural Products Marketing Act)</p>
5	<p>Will the new regulations impact buy local?</p> <p>With regards to labeling restriction, exported products often require particular branding. Therefore, if exporting cannabis, labelling restrictions may only apply domestically not internationally.</p>	Distribution		s.13



**Implementation of Cannabis Regulations -Potential Issues for Ministry of Agriculture**

6	Will the regulations allow for innovation of products ex. edibles	Production, manufacturing, retail.	s.13	
7	Will the province be responsible to track and licence production?  Need to create traceability system and address environmental stewardship issues. This will require charging a fee, staffing up, setting up of processes.  s.13	Cultivation, manufacturing, distribution and retail		
8	Will there be importing of Cannabis seeds? If so how will pest management be handled? Who will be responsible?  Will reporting and licencing be voluntary or mandatory?			Question-Would CFIA be involved in importing? Answer-Maybe, maybe not.

## Implementation of Cannabis -ALC Discussion

### Discussion Minutes

<b>Date</b>		May 31, 2017	
<b>Time</b>		1:30-2:30 pm	
<b>Discussion Participants</b>		Participants: s.15;s.19	
		Regrets: s.15;s.19	
		<b>Notes</b>	
<b>Agenda Items</b>		Agenda approval (1 min)	<b>Action</b> Approved
1)	Round table Introduction (5 min)	<i>Intended outcome: Participants are familiar with each other's role</i>	
2)	Presentation: The Cannabis Act (25 mins)	<i>Intended outcome: Participants have a better understanding of the proposed Cannabis Act.</i>  s.13;s.16	

		s.13;s.16	
3)	Discussion (25 min)		
4)	Next steps (4 min)		s.15;s.19 to follow-up with ALC once consultation questions have been

		s.13;s.16	determined.
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## Implementation of Cannabis -ALC Discussion

### Discussion Minutes

<b>Date</b>		May 31, 2017	
<b>Time</b>		1:30-2:30 pm	
<b>Discussion Participants</b>		Participants:s.15;s.19	
		Regrets:s.15;s.19	
		<b>Notes</b>	
<b>Agenda Items</b>		Agenda approval (1 min)	<b>Action</b> Approved
1)	Round table Introduction (5 min)	<i>Intended outcome: Participants are familiar with each other's role</i>	
2)	Presentation: The Cannabis Act (25 mins)	<i>Intended outcome: Participants have a better understanding of the proposed Cannabis Act.</i> s.13;s.16	

	s.13;s.16	
3)	Discussion (25 min)	
4)	Next steps (4 min)	s.15;s.19 to follow-up with ALC once consultation questions have been determined.

## Implementation of Cannabis Regulations-Working Group Meeting

### Meeting Agenda

<b>Date</b>		May 30, 2017	
<b>Time</b>		10:00-11:30 pm	
<b>Meeting Participants</b>		Meeting Chair: s.15;s.19	
		Participants: s.15;s.19	
		Regrets: s.15;s.19	
<b>Agenda Items</b>		<b>Notes</b>	<b>Action</b>
1)	Agenda approval (1 min)	<i>Intended outcome: agreed upon agenda or additional items are added</i>	
2)	Action Items from previous meeting (4 min)	<i>Intended outcome: To provide requested information to the working group and review working group progress on assigned tasks.</i> s.13;s.16	
3)	Project updates (5 mins)		

		s.13;s.16
4)	Stakeholder Identification (8 mins)	
5)	Continuation of Presentation: The Cannabis Act (15 mins) s.13;s.16	
6)		
7)	<b>If time allows</b> s.13;s.16	
8)	Next Meeting (1 min)	




## Implementation of Cannabis Regulations-Working Group Meeting

### Meeting Minutes

<b>Date</b>		March 2, 2017	
<b>Time</b>		1:30-2:30 pm	
<b>Meeting Participants</b>		Meeting Chair:s.15;s.19	
		Participants:s.15;s.19 s.15;s.19	
		Regrets:s.15;s.19	
<b>Agenda Items</b>		<b>Notes</b>	<b>Action</b>
1)	Agenda approval (2 min)	<i>Intended outcome: agreed upon agenda or additional items are added</i>  s.15;s.19 suggests new participants introduce themselves and working group do a round table intro.	Agenda item added, introduction for new participants
2)	Action Items from previous meeting (5 min)	<i>Intended outcome: To provide requested information to the working group and review working group progress on assigned tasks.</i>  s.13;s.16	
3)	Review of Ministry		

	programs along the value chain. (5 min)	s.13;s.16	<p>s.15;s.19 to send program email program info to s.15;s.19</p> <p>s.15;s.19 to connect with s.15;s.19 complete matrix for next meeting.</p> <p>s.15;s.1 to add FIRB and ALC to the list of programs.</p>
4)	Review of Identified implementation issues (5 min)		s.15;s.1 to update impacts worksheet
5)	Fill out advice for Ministers worksheet (35 mins)		<p>s.15;s.1 to input working group comments on worksheet and redistribute to working group.</p> <p>s.15;s.1 to add activity to next meeting agenda.</p>
6)	Discussion (5 min)		

		s.13;s.16	
	New Working Group Members Introduction		
7)	Next Meeting (3 min)		s.15;s.19 to send invite for next working group meeting

## Implementation of Cannabis Regulations-Working Group Meeting

### Meeting Minutes

<b>Date</b>		March 12, 2018	
<b>Time</b>		2:30-3:30 pm	
<b>Meeting Participants</b>		Meeting Chair: s.15;s.19	
		Participants: s.15;s.19	
		s.15;s.19 Regrets:	
<b>Agenda Items</b>		<b>Notes</b>	<b>Action</b>
1)	Agenda approval (1 min)	<i>Intended outcome: agreed upon agenda or additional items are added</i>	<b>Approved</b>
2)	New Member (1 min)	<i>Intended outcome: to introduce new working group member.</i>	
3)	Action Items from previous meeting (1 min)	<i>Intended outcome: To provide requested information to the working group and review working group progress on assigned tasks.</i> s.13;s.16	
4)	Project Updates Roundtable (20 mins)		

5)	Updates from the Secretariat (20 mins)	s.13;s.16	<p>s.15;s.19 <b>to set up meeting to provide overview of report.</b></p> <p>s.15;s.19 <b>to set up meeting to discuss C and E guidelines.</b></p>
6)	AGRI updates (10 mins)		

	s.13;s.16
7)	Next Meeting (1 min)

## Implementation of Cannabis Regulations-Working Group Meeting

### Meeting Minutes

<b>Date</b>		May 30, 2017	
<b>Time</b>		10:00-11:30 pm	
<b>Meeting Participants</b>		Meeting Chair s.15;s.19	
		Participant s.15;s.19 s.15;s.19	
		Regret s.15;s.19	
<b>Agenda Items</b>		<b>Notes</b>	<b>Action</b>
1)	Agenda approval (1 min)	<i>Intended outcome: agreed upon agenda or additional items are added</i>	Approved
2)	Action Items from previous meeting (4 min)	<i>Intended outcome: To provide requested information to the working group and review working group progress on assigned tasks.</i> s.13;s.16	s.15;s.19 to follow-up with inter-ministry
3)	Project updates (5 mins)		Once meetings with ALC and BC FIRB are completed s.15;s.19

	s.13;s.16	<p>will distribute meeting minutes to working group.</p> <p>Working group to review legislative analysis and provide feedback if any.</p> <p>s.15;s.1 a to email Request for funding document to working group.</p> <p>Working group to provide further feedback if any.</p>
4)	Stakeholder Identification (8 mins)	<p>s.15;s.19 to follow up with Admin</p>



		s.13;s.16	for stakeholder contact info
5)	Continuation of Presentation: The Cannabis Act (15 mins) AGRI Impacts		

		s.13;s.16	
6)	s.13;s.16		

s.13;s.16

s.13;s.16

7) **If time allows**  
s.13;s.16

		s.13;s.16	
8)	Next Meeting (1 min)		s.15;s.19 to create <b>AGRI Cannabis  working group  workplan</b> s.15;s.19 to type <b>and distribute  meeting minutes  to working group</b> s.15;s.19 to send <b>out next meeting  invite and  agenda</b>

## Implementation of Cannabis Regulations-Working Group Meeting

### Meeting Minutes

<b>Date</b>		November 30, 2017	
<b>Time</b>		11:00-12:00 pm	
<b>Meeting Participants</b>		Meeting Chair: s.15;s.19	
		Participants: s.15;s.19 s.15;s.19	
		Regrets:	
<b>Agenda Items</b>		<b>Notes</b>	<b>Action</b>
1)	Agenda approval (1 min)	<i>Intended outcome: agreed upon agenda or additional items are added</i>	<b>Approved</b>
2)	Action Items from previous meeting (1 min)	<i>Intended outcome: To provide requested information to the working group and review working group progress on assigned tasks.</i>  No action items from previous meeting	
3)	Project Updates Roundtable (10 mins)	s.13;s.16	

	s.13;s.16	
4)	Updates from the Secretariat (10 mins)	<div>s.15;s.19</div> <div>to forward</div> <div>invite to s.15;s.19</div> <div>s.15;s.19</div>
5)	AGRI updates (10 mins)	

	s.13;s.16
6)	<p>Discussion on s.13;s.16</p> <p>(30 mins)</p>

**Working group  
members to forward  
cannabis industry  
contacts to**<sup>s.15;s.19</sup>



	s.13;s.16	
7)	Next Meeting (1 min)  Next meeting in approximately one month.	s.15;s.19 <b>to send out invite for next meeting</b>

**Implementation of Cannabis-ALC Discussion**

**Discussion Minutes**

<b>Date</b>		March 29, 2017	
<b>Time</b>		11:00-12:00 pm	
<b>Discussion Participants</b>		Participants:s.15;s.19	
		Regrets:s.15;s.19	
		<b>Notes</b>	
<b>Agenda Items</b>		Agenda approval (1 min)	<b>Action</b> Approved
1)	Round table Introduction (5 min)	<p><i>Intended outcome: Participants are familiar with each other's role</i></p> <p>s.15;s.19 ALC, lots of local government experience</p> <p>s.15;s.19 ALC</p> <p>s.15;s.19 AGRI, experience in local government planning.</p> <p>s.15;s.19 AGRI, lead on Cannabis project</p>	
2)	Project Background (7 min)	<p><i>Intended outcome: Participants understand project purpose and intended outcomes</i></p> <p>s.15;s.19 gives presentation</p>	
3)	Discussion (45 min)	s.13;s.16	

**Discussion Notes:**

s.13;s.16

	s.13;s.16	
4)	Next steps (2 min)	

## Ministry of Agriculture

*A federal task force recently released a framework to guide the drafting of the regulations for Legalization of Cannabis in Canada. The regulations are projected to be released in April 2017.*

*In the right hand column of the chart below are highlights from the report which outline the advice to Ministers. In the left hand column the Ministry of Agriculture (AGRI) Cannabis working group has identified the projected degree of impact for the AGRI and the level of resources required to manage the impact of each point of advice. All working group comments are written in red.*

### Minimizing Harms

### Minimum Age

<p><b><i>AGRI Impact and Resources required</i></b></p>	<p><b><i>Advice for Ministers</i></b></p> <ul style="list-style-type: none"> <li>• The task force recommends that the federal government set a national minimum age of purchase of 18, acknowledging the right of provinces and territories to harmonize it with their minimum age of purchase or alcohol.</li> </ul>	<p>s.13</p>
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### Promotion, Advertising and Marketing Restrictions

<b>AGRI Impact and Resources Required</b> s.13	<b>Advice for Ministers</b> s.13

## Cannabis-based Edibles and Other Products

<i>AGRI Impact</i>	<i>Advice for Ministers</i>
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### THC Potency

s.13

The diagram illustrates the flow of information from **AGRI Impact** to **Advice for Ministers**. A vertical line connects the two boxes, with a horizontal line segment labeled **s.13** indicating the specific mechanism or section involved.

### Tax and Price

s.13

<b>AGRI Impact</b>	<b>Advice for Ministers</b>
s.13	s.13

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Legalization and Regulation of Cannabis-Impacts on Ministry of Agriculture

s.13	s.13;s.16

Public Education

s.13	s.13
<b>AGRI Impact</b>	<b>Advice for Ministers</b>

Prevention and Treatment

s.13	s.13
<b>AGRI Impact</b>	<b>Advice for Ministers</b>

Workplace Safety

s.13	s.13
<b>AGRI Impact</b>	<b>Advice for Ministers</b>

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s.13	<div>s.13;s.16</div>	
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**Establishing a Safe and Responsible Supply Chain**

**Production**  
s.13

<i>AGRI Impact</i>	<i>Advice for Ministers</i>
s.13	s.13;s.16
	s.13;s.16
	<div>s.13</div>
	s.13
	s.13
	s.13;s.16
	s.13
	s.13;s.16



Ministry of Agriculture  
Legalization and Regulation of Cannabis-Impacts on Ministry of Agriculture

**Distribution**  
s.13;s.16

<b>AGRI Impact</b>	<b>Advice for Ministers</b>
s.13	s.13;s.16
	s.13;s.16

**Retail**  
s.13;s.16

<b>AGRI Impact</b>	<b>Advice for Ministers</b>
s.13	s.13;s.16

The Task Force further recommends that the retail environment include:

<b>AGRI Impact</b>	<b>Advice for Ministers</b>
s.13	s.13

**Personal Cultivation**  
s.13

<b>AGRI Impact</b>	<b>Advice for Ministers</b>
s.13	s.13

# Legalization and Regulation of Cannabis-Impacts on Ministry of Agriculture

s.13	s.13;s.16

## Enforcing Public Safety and Protection

### Illegal Activities

<b>AGRI Impact</b>	<b>Advice for Ministers</b>
s.13	s.13

### Personal Possession

<b>AGRI Impact</b>	<b>Advice for Ministers</b>
s.13	s.13

### Place of Use

s.13;s.16

<b>AGRI Impact</b>	<b>Advice for Ministers</b>
s.13	s.13

Ministry of Agriculture  
Legalization and Regulation of Cannabis-Impacts on Ministry of Agriculture

s.13	s.13
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Impaired Driving

<b>AGRI Impact</b>	<b>Advice for Ministers</b>
s.13	s.13;s.16

<b>AGRI Impact</b>	<b>Advice for Ministers</b>
s.13	s.13;s.16

Medical Access

<b>AGRI Impact</b>	<b>Advice for Ministers</b>
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Ministry of Agriculture  
Legalization and Regulation of Cannabis-Impacts on Ministry of Agriculture

s.13

s.13

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s.13;s.16

—s.13

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**Implementation**

**Capacity**

s.13

<i><b>AGRI Impact</b></i>	<i><b>Advice for Ministers</b></i>
s.13	s.13
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s.13	<div>s.13</div> <div>s.13</div> <div></div>
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**Oversight**

<b>AGRI Impact</b> s.13	<b>Advice for Ministers</b> s.13
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**Co-ordination**

<b>AGRI Impact</b> s.13	<b>Advice for Ministers</b> s.13
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**Communication**

<b>AGRI Impact</b> s.13	<b>Advice for Ministers</b> s.13
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s.13

s.13

## Information gleaned from consultation with Health Canada and Cannabis Industry

December 14<sup>th</sup> and 15<sup>th</sup>, 2017.

Vancouver, B.C.

This document is a summary of information gathered from the Consultation with Health Canada and the Cannabis Industry that took place on Dec 14 and 15<sup>th</sup> in Vancouver B.C. In an attempt to present the information in a way that is both relevant and useful to AGRI, the information reported from the meeting is confined to that most relevant to AGRI and has been grouped according to its potential impact on provincial policy decisions.

**Policy Question 1:** *To ensure provincial goals for public health and safety and economic development are met, what level of provincial oversight should the province have in cannabis production?*

s.13;s.16

### Industry comments:

- A key comment that was repeated by small producers was that unless the regulations allowed small producers to participate competitively within the legal framework they would continue to operate as part of the black market
- Another key comment from industry was eagerness to engage with and continue conversations with both provincial and federal governments.

### **Policy Question 2:** Agricultural Reserve Land

- a) *To what extent should the province regulate cannabis production on the Agricultural Land Reserve (ALR)?*

- b) Should the province regulate medical cannabis, non-medical cannabis, and industrial hemp differently within the ALR?*
- c) Should certain types of cannabis cultivation and processing be more aggressively regulated within the ALR?*

s.13;s.16

### **Policy Question 3: Local Government and Cannabis Production and Processing**

- a) To what extent will the province allow local governments in British Columbia to regulate cannabis production (cultivation and processing) within the ALR?*
- b) What options will the provincial government allow for the local government to make regarding production and processing activities within their communities?*

s.13;s.16



regulations to do this, however there is an expectation that provincial regulations and municipal bylaws will not frustrate the federal intent.

**Policy Question 4: Economic Development of Cannabis Production and Processing**

- a) What level of provincial investment will be allocated to promote economic development of production and processing within British Columbia?*
- b) If able, should the province regulate different classes of cannabis producers and processors differently (E.g. medical vs. non-medical, standard cultivator vs. micro-cultivator, greenhouse vs. bunker vs. outdoor production; standard processor vs. micro-processor)?*
- c) If able, should the province allow vertical integration of federal licences for cultivation, processing, retail (federally licenced medical cannabis) and provincial licences for retail?*

s.13;s.16

Industry Recommendations:

- Small craft producers want to have vertical integration so they can sell their own product.
- Some craft producers will only want to produce others will want full vertical integration. Regulatory cost burden needs to be balanced with benefit and opportunity to make profit.
- Micro cultivation threshold be somewhere between 10,000-20,000 square feet.
- Micro processing licence should be based on where product is coming from- i.e. a standards or micro cultivator.
- Industry estimates that producers producing under 10, 000 sq ft. capture most of the micro producers in the province. However, approx. 20% of micro producers fall between 10,000-20, 000 sq. feet and the amount of product makes up approximately 50% of craft product in BC.
- Rules currently prevent growers from being organic. Need to allow farming and agricultural activity.
- Establishing organics branding appeared to be of high interest to small producers.

## **Policy Question 5: Good Production Practices**

- a) What role should the province play concerning cannabis 'good production practices'?*
- b) To what extent should the province monitor and enforce cannabis good production practices?*

s.13;s.16

### Industry Recommendations:

- Craft industry suggests that there is a desire to have fertilizers regulated in addition to pesticides.
- Craft industry is interested in branding for organic cannabis
- Craft industry suggests that there be incentives for organic production and reducing environmental impacts as well as packaging incentives to decrease use of plastics.
- Recommendations: rules currently prevent growers from being organic. Need to allow farming and agricultural activity.
- Limits on microbial content should be clarified to identify good vs bad bacteria.
- Cannabis is much more difficult to grow without pesticides need to have certification and quality assurance measures in place.
- Quality Assurance personal standards set by Health Canada are extremely high. This limits the ability for those with experiential knowledge and expertise. There is a large cost associated with Q and A credentials.
- Ensuring regulations enabled use of organic growing methods was of high interest to small producers.

## **Key Decisions Needed**

s.12;s.13

May 11, 2018

## **Key Decisions Needed**

s.12;s.13

May 11, 2018

**Issue: Cannabis Legislation and the Agriculture Sector**  
s.13;s.16

**Suggested Response:**

- BC is working to support the federal government in legalization of non-medical cannabis.
- BC is concerned about the tight timelines for implementation.
- BC would like to see further consultation with the provinces and territories in the development of the regulations, in order to implement an approach that meets both federal and provincial objectives.

s.13;s.16

- BC is currently engaged in the initial stages of policy development for economic development and the cannabis industry, which includes a scoping of potential eligibility for programs funded under CAP.

**Ministry of Agriculture**  
**KEY MESSAGES FOR MINISTER FOR MEETING**  
with <<Name>>, <<Date>>

Ref: XXXXXX

Date: July 5, 2018

**Issue:** Amendments are being made to the Agricultural Land Reserve Use, Subdivision and Procedure Regulation

**Key Messages/Suggest Response:**

- **Federal legalization of non-medical cannabis created the need for provincial review and update of the Provincial Agricultural Land Reserve Use, Subdivision and Procedure Regulation so that it is reflective of new Federal Cannabis Act and Cannabis Regulation.**
- **The Ministry of Agriculture has worked closely with other provincial ministries to ensure that the regulatory amendments reflect the overall provincial framework for Cannabis legalization.**
- **In addition, through the established Provincial and Local Government Joint Commission for Cannabis Regulation the Ministry has heard the key concerns of Local governments related to cannabis production.**
- **The amendments to the ALRUSPR will expand Local Governments' ability to make decisions related to Cannabis production on the ALR within their jurisdictions.**
- **To protect existing capital investments the regulatory amendments allow for Grandfathering of all existing cannabis operations that were licensed under the previous federal regulations to continue operation on the ALR. In addition, the Regulation will allow for existing structures on the ALR to transition to Cannabis production.**
- **The Agricultural Land Reserve is a limited provincial resource protected for the purpose of conducting agricultural activities. An aspect of that resource is the soil itself and as such the regulation provides local government increased ability to restrict non soil based cannabis production facilities on the ALR within their jurisdictions.**
- 
- **The Agricultural L**
- **Nuisance complaints**
- 

**Background:**

Contact: NAME, Corporate Governance, Policy and Legislation, PHONE

ED \_\_\_\_\_ ADM \_\_\_\_\_ DM \_\_\_\_\_

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**Act:**

*Agricultural Land Commission Act ("ALCA")*

Agricultural Land Reserve Use, Subdivision and Procedure Regulation under the ALCA

**Applicable terms as defined in the Act:**

ALCA:

- "agricultural land" means land designated as agricultural land under this Act and includes agricultural land under a former Act;
- "agricultural land reserve" means agricultural land designated as an agricultural land reserve under this Act and includes an agricultural land reserve under a former Act;

Agricultural Land Reserve Use, Subdivision and Procedure Regulation:

- "farm" means an occupation or use, for farm purposes, of one or several parcels of land or tenured areas of Crown land

**Relevant sections:**

Agricultural Land Commission Act:

58 (2) Without limiting subsection (1), the Lieutenant Governor in Council may make regulations as follows:

- (a) designating uses of land as farm use;
  - (a.1) specifying farm uses of agricultural land that may not be prohibited by a local government enactment or a first nation government law;
- (b) prescribing permitted non-farm uses of agricultural land and specifying permitted non-farm uses that may or may not be prohibited by a local government enactment or a first nation government law;

**Interpretation of the Act:**

s.13;s.16

Agricultural Land Reserve Use, Subdivision and Procedure Regulation:

2 (1.1) The activities designated under this section as farm uses for the purposes of the Act must not be prohibited

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(a) by any local government bylaw except a bylaw under section 917 of the *Local Government Act*, or

(b) by a law of the applicable treaty first nation government, if the activity is undertaken on treaty settlement lands.

(2) The following activities are designated as farm use for the purposes of the Act:

(p) the production of marihuana in accordance with the Marihuana for Medical Purposes Regulations, SOR/2013-119 (Canada);

**Interpretation of the Act:**

s.13;s.16

**Current state/situation related to medicinal marihuana:**

s.13;s.16

**Assumption about proposed federal legislation:**

s.13;s.16

s.13;s.16



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s.13;s.16

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**Act:**

*Local Government Act*

Note: The Ministry of Agriculture is responsible for ss. 551 to 555 only [Regulation of Farm Businesses in Farm Areas]. The Ministry of Community, Sport and Cultural Development has ownership of the majority of this Act.

**Applicable terms as defined in the Act:**

- "agricultural land" has the same meaning as in the *Agricultural Land Commission Act*
- "Agricultural Land Commission" means the Provincial Agricultural Land Commission established under section 4 of the *Agricultural Land Commission Act*
- "farm business" has the same meaning as in the *Farm Practices Protection (Right to Farm) Act*
- "farm operation" has the same meaning as in the *Farm Practices Protection (Right to Farm) Act*
- "farmer" has the same meaning as in the *Farm Practices Protection (Right to Farm) Act*
- "farming area" means an area of land

(a) that is in an agricultural land reserve as defined in the *Agricultural Land Commission Act*,

(b) that is designated as a farming area under the *Farm Practices Protection (Right to Farm) Act*,  
or

(c) in relation to which a person carries on a type of aquaculture prescribed as a farm operation under the *Farm Practices Protection (Right to Farm) Act*

**Relevant sections:**

*Agriculture minister may set standards for farm bylaws*

551 (1) In this Division, "agriculture minister" means the minister responsible for the administration of the *Farm Practices Protection (Right to Farm) Act*.

(2) The agriculture minister may establish, publish and distribute standards in relation to farming areas for the guidance of local governments in the preparation of zoning bylaws and bylaws under this Division.

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(3) Standards under subsection (2) may differ for different parts of British Columbia.

*Farming area bylaws*

552 (1) This section does not apply unless a regulation under section 553 declares that it applies.

(2) A local government may make bylaws in relation to farming areas as follows:

- (a) respecting the conduct of farm operations as part of a farm business;
- (b) respecting types of buildings, structures, facilities, machinery and equipment that are prerequisite to conducting farm operations specified by the local government and that must be utilized by farmers conducting the specified farm operations;
- (c) respecting the siting of stored materials, waste facilities and stationary equipment;
- (d) prohibiting specified farm operations.

(3) A bylaw under subsection (2) may be different for one or more of the following:

- (a) different sizes or types of farms;
- (b) different types of farm operations;
- (c) different site conditions;
- (d) different uses of adjoining land;
- (e) different areas.

(4) Unless exempted under subsection (5), a bylaw under subsection (2) may be adopted only with the approval of the agriculture minister.

(5) The agriculture minister may make regulations

- (a) defining areas for which and describing circumstances in which approval under subsection (4) is not required, and
- (b) providing that an exception under paragraph (a) is subject to the terms and conditions specified by that minister.

(6) Regulations under subsection (5) may be different for different regional districts, different municipalities, different areas and different circumstances.

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(7) A local government may not exercise a power under this or any other Part of this Act or the *Community Charter* to do anything that the local government is specifically authorized to do under this section.

*Authority and restrictions apply as declared by regulation*

553 The Lieutenant Governor in Council may, by regulation, declare that, generally or for some or all of the geographic area specified in the regulation, on and after the date specified in the regulation, section 481 (2) [*restrictions on zoning authority in relation to farming*] or 552 [*farming area bylaws*] applies to

- (a) the board of a regional district specified in the regulation,
- (b) the council of a municipality specified in the regulation, or
- (c) the local trust committee under the *Islands Trust Act* of a local trust area specified in the regulation.

**Interpretation:**

s.13;s.16

**Current state/situation related to medicinal marihuana:**

Minister's Bylaw Standards:

- The Minister's Bylaw Standard for Medicinal Marihuana establishes the limits to which local governments can restrict cannabis production in the ALR, and provides local governments with ready to use bylaw provisions.

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- The bylaw standards prescribe minimum setback distances, maximum lot coverage and height requirements, and storm water and agricultural waste management plans in relation to production of marihuana in accordance with the federal regulations.
- Communities that are regulated under s. 553 of the LGA are expected to amend their bylaws to be consistent with these standards, while local governments that are not regulated are encouraged to adopt them.

Farm Bylaw Standards:

s.13;s.16

**Assumption about proposed federal legislation:**

s.13;s.16

s.13;s.16

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**Act:**

*Farm Practices Protection (Right to Farm) Act*

**Relevant terms as defined in the Act:**

- "farm business" means a business in which one or more farm operations are conducted, and includes a farm education or farm research institution to the extent that the institution conducts one or more farm operations;
- "farm operation" means any of the following activities involved in carrying on a farm business:

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- (a) growing, producing, raising or keeping animals or plants, including mushrooms, or the primary products of those plants or animals;
- (b) clearing, draining, irrigating or cultivating land;
- (c) using farm machinery, equipment, devices, materials and structures;
- (d) applying fertilizers, manure, pesticides and biological control agents, including by ground and aerial spraying;
- (e) conducting any other agricultural activity on, in or over agricultural land;

and includes

- (k) processing or direct marketing by a farmer of one or both of
  - (i) the products of a farm owned or operated by the farmer, and
  - (ii) within limits prescribed by the minister, products not of that farm,

to the extent that the processing or marketing of those products is conducted on the farmer's farm;

- "normal farm practice" means a practice that is conducted by a farm business in a manner consistent with
  - (a) proper and accepted customs and standards as established and followed by similar farm businesses under similar circumstances, and
  - (b) any standards prescribed by the Lieutenant Governor in Council,and includes a practice that makes use of innovative technology in a manner consistent with proper advanced farm management practices and with any standards prescribed under paragraph (b).

**Relevant sections:**

*Complaints to board*

- 3 (1) If a person is aggrieved by any odour, noise, dust or other disturbance resulting from a farm operation conducted as part of a farm business, the person may apply in writing to the board for a determination as to whether the odour, noise, dust or other disturbance results from a normal farm practice.
- (2) Every application under subsection (1) must

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- (a) contain a statement of the nature of the complaint, the name and address of the person making the application, the name and address of the farmer and the location of the farm,
- (b) be in a form acceptable to the chair of board, and
- (c) be accompanied by the fee prescribed by the Lieutenant Governor in Council.

*Hearing of complaints*

6 (1) The panel established to hear an application must hold a hearing and must

- (a) dismiss the complaint if the panel is of the opinion that the odour, noise, dust or other disturbance results from a normal farm practice, or
- (b) order the farmer to cease the practice that causes the odour, noise, dust or other disturbance if it is not a normal farm practice, or to modify the practice in the manner set out in the order, to be consistent with normal farm practice.

**Interpretation:**

s.13;s.16

**Current state/situation related to medicinal marihuana:**

To date March 2017, no complaints have been received regarding medicinal cannabis production. There are no established normal farm practices for recreational cannabis. Normal farm practices may differ depending on method of growing i.e. indoor vs outdoor, and commercial producer vs. craft producer. Local governments are already raising concerns over run-off associated with production of medical marijuana.

**Assumption about proposed federal legislation:**

s.13;s.16

s.13;s.16

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s.13;s.16

**Policy options:**

s.13;s.16

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**Act:**

*Natural Products Marketing Act*

**Relevant terms as defined in the Act:**

- "natural product" means a product of agriculture or of the sea, lake or river and an article of food or drink wholly or partly manufactured or derived from such product;
- "regulated product" means a natural product the regulation of the marketing of which is provided for in a scheme approved or established under this Act;

**Relevant sections:**

*Marketing schemes, marketing boards and commissions*

2 (1) The purpose and intent of this Act is to provide for the promotion, control and regulation of the marketing of natural products, including

(a) the prohibition of all or part of that marketing, and

(b) the establishment of biosecurity programs, and the imposition of requirements in relation to insurance, for those engaged in the production of natural products.

(2) The Lieutenant Governor in Council may

(a) establish, amend and revoke schemes for the promotion, control and regulation of the marketing of natural products,

(b) constitute marketing boards and commissions to administer the schemes, and

(c) vest in those marketing boards and commissions the powers considered necessary or advisable to enable them to carry out effectively the purpose and intent of this Act.

(3) A scheme may relate to all or part of British Columbia and may relate to one or more natural products or to a grade or class of product.

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(4) The method by which the members of a marketing board or commission are to be chosen, whether by appointment or election, or partly the one and partly the other, may be set out in the scheme that the marketing board or commission is authorized to administer.

**Interpretation:**

s.13;s.16

**Current state/situation related to medicinal marihuana:**

Cannabis production for medicinal purposes is *not* currently a regulated commodity under the *Natural Products Marketing Act*.

s.13;s.16

**Assumption about proposed federal regulations:**

s.13;s.16

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s.13;s.16

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**Act:**

*Farming and Fishing Industries Development Act*



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**Terms:**

- "commodity" means a product derived from plants or animals, including parts, products or by-products, and fish or aquatic plants, that are raised or gathered for profit
- "producer" includes a gatherer of plants or animals

**Relevant sections:**

*Plan, council and fund*

2 (1) Before the minister may establish a fund under this Act to promote the interests of all producers of a commodity, producers of that commodity must

(a) obtain the minister's approval to a plan for

(i) informing the producers about

(A) the proposed fund, levy and council,

(B) whether there will be any provision for refunding all or part of the levy, and

(C) any other related matters that the minister requires, and

(ii) determining whether the producers of the commodity support the proposals, and

(b) in accordance with the approved plan, satisfy the minister that the producers of the commodity support the proposals in the plan.

(6) If, in relation to a commodity, a council and fund are established under this section,

(a) the council is responsible to the minister for the administration of the fund, and

(b) the management, administration and control of the fund are vested in the council.

*Revenue and expenditure*

4 (1) Subject to the approval of the Lieutenant Governor in Council, a council must establish a levy or class of levy that at the time and in the manner specified in the regulations must be paid by producers or a class of producers of the commodity for which the fund was established.

(2) The council may pay out of the fund the amounts it considers appropriate to

(a) pay an expense approved by the minister as being necessary for or incidental to the administration of this Act in relation to the fund, or

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(b) pay to a person, including a person representing the producers of a commodity, a sum to

(i) benefit and promote the industry in British Columbia in respect of a commodity, or

(ii) conduct or support research or educational programs in British Columbia in respect of the development and promotion of a commodity.

(3) The Lieutenant Governor in Council, by regulation, may prohibit a council from making payment for purposes specified in the regulations.

**Interpretation:**

s.13;s.16

**Current state/situation related to medicinal marihuana:**

There is no industry council for medicinal marihuana producers.

**Assumption about proposed federal regulations:**

s.13;s.16

s.13;s.16

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**Act:**

*Assessment Act*

Classification of Land as a Farm Regulation under the *Assessment Act*

Note: The Ministry of Community, Sport and Cultural Development is responsible for the *Assessment Act* and its corresponding regulations. However, it may seek input from the Ministry of Agriculture from

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time to time, such as with respect to what constitutes a qualifying agricultural product. There is potential for the cannabis industry to petition the Minister for Cannabis to be recognized as a farm product.

**Terms:**

*Assessment Act:*

- "farm" means an area of land classified as a farm under this Act

*Classification of Land as a Farm Regulation:*

- "qualifying agricultural product" means a product, including, without limitation, a breeding product, that is a product of a qualifying agricultural use
- "qualifying agricultural use" means a use of land for agricultural purposes as approved by the assessment authority, following consultation with the minister responsible for the administration of the *Ministry of Agriculture and Food Act*, and that
  - (a) is an agricultural use set out in section 1 of the Schedule to this regulation, and
  - (b) is not an excluded use set out in section 2 of the Schedule to this regulation

**Relevant sections:**

*Assessment Act:*

*Classification of land as a farm*

23 (0.1) In this section:

"owner's dwelling" means the dwelling referred to in subsection (3.1) (a) (iii);

"retire" means retire from being actively involved in the day-to-day activities on a farm;

"retired farmer" means an individual

(a) who, at all times during a prescribed period or periods of time,

(i) occupied, as the individual's principal residence, a dwelling that was owned by the individual or the individual's spouse and was located on land that was

(A) owned by the individual or the individual's spouse,

(B) used for the dwelling, and

(C) classified as a farm, and

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- (ii) was actively involved in the day-to-day activities on land that was
  - (A) owned by the individual or the individual's spouse,
  - (B) classified as a farm, and
  - (C) part of the parcel or adjacent to the parcel on which the dwelling was located, and

(b) who has retired.

(1) An owner of land who wants all or part of the land classified as a farm must apply to the assessor using the application form, and following the procedure, prescribed by the assessment authority.

(2) Subject to this Act, the assessor must classify as a farm any land, or any part of a parcel of land, that meets the standards prescribed under subsection (3).

(3) The Lieutenant Governor in Council must prescribe standards for classification of land as a farm.

(3.1) Despite this Act and any regulations made under this Act except a regulation made under subsection (3.2), the assessor must, on receipt of an application from an owner of land in respect of a taxation year, classify the land as a farm for the taxation year if the following requirements are met:

(a) when the application is made, the owner

(i) is

- (A) a retired farmer,
- (B) the spouse of a retired farmer, or
- (C) a person who was the spouse of a retired farmer at the time of the retired farmer's death,

(ii) has reached the prescribed age, and

(iii) owns a dwelling on the land and occupies the dwelling as the owner's principal residence;

(b) if the owner is a person referred to in paragraph (a) (i) (B) or (C), the owner meets the prescribed requirements, if any;

(c) when the application is made, the land is used for the owner's dwelling;

(d) when the retired farmer retired,

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- (i) the retired farmer or the retired farmer's spouse owned the owner's dwelling,
  - (ii) the owner occupied the owner's dwelling as the owner's principal residence,
  - (iii) the land was classified as a farm, and
  - (iv) the retired farmer met the prescribed requirements, if any;
- (e) the land is in an agricultural land reserve on October 31 of the year preceding the taxation year in respect of which the application is made;
- (f) the owner's dwelling is located
  - (i) on a parcel of land that, under subsection (2), is classified in whole or in part as a farm for the taxation year in respect of which the application is made, or
  - (ii) on a parcel of land adjacent to a parcel of land
    - (A) that is owned by the owner or the owner's spouse, and
    - (B) that, under subsection (2), is classified in whole or in part as a farm for the taxation year in respect of which the application is made;
- (g) the application is
  - (i) in the form prescribed by the assessment authority, and
  - (ii) received by the assessor on or before October 31 of the year preceding the taxation year in respect of which the application is made;
- (h) the requirements, if any, prescribed by regulation.

(3.2) The Lieutenant Governor in Council may make regulations respecting classification of land as a farm under subsection (3.1), including, without limitation, for the purposes of subsections (0.1) and (3.1).

(3.3) In making regulations under subsection (3.2), the Lieutenant Governor in Council may make different regulations for different classes of persons, classes of land, classes of places or classes of things.

(4) Land classified as a farm must, while so classified, be valued at its actual value as a farm, without regard to its value for other purposes.

(5) The actual value of improvements on a farm must be determined under section 19.

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(6) If land classified as a farm ceases to meet the standards for that classification merely because the farm is reduced in area as a result of a portion being expropriated for a public purpose, the land continues to be classified as a farm until it no longer meets the standards in some other respect.

(7) For the purposes of valuing a farm under subsection (4), the assessment authority must prescribe land value schedules for use by assessors in determining the actual value of the land as a farm without regard to its value for other purposes.

(8) In subsections (9) and (10), "assessed value" means assessed value before exemptions.

(9) If the assessed value determined under section 19 (13) for any year of land classified as a farm exceeds the assessed value for the preceding year by more than 10%, its assessed value for that year is the total of

(a) 110% of the assessed value for the preceding year, and

(b) 25% of the difference between the assessed value determined under section 19 (13) for that year and 110% of the assessed value for the preceding year.

(10) If an obvious error or omission occurred in the preparation of the assessed value in the preceding year, the assessed value under subsection (9) must be determined as though the error or omission had not occurred.

Classification of Land as a Farm Regulation:

*Classification of land as a farm*

4 (1) Unless this Part provides otherwise, the assessor must classify as farm all or part of a parcel of land used for

(a) a qualifying agricultural use,

(b) a farmer's dwelling, or

(c) the training and boarding of horses when operated in conjunction with horse rearing.

(2) Land will only be classified as a farm where part of a parcel or parcels of land are

(a) necessary to the farm, and

(b) predominantly used for a qualifying agricultural use.

*Excluded uses*

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2 The following are excluded uses for the purposes of paragraph (b) of the definition of "qualifying agricultural use" in section 1 (1) of this regulation:

- (a) the production of manufactured derivatives from agricultural raw materials;
- (b) the production of qualifying agricultural products for domestic consumption on the farm;
- (c) the production of agricultural by-products other than breeding products;
- (d) agricultural services other than horse stud services;
- (e) the breeding and raising of pets other than horses;
- (f) the production of any substance set out in item 1 [*opium poppy*], 2 [*coca*] or 17 [*cannabis*] of the Schedule to the *Narcotic Control Regulations under the Controlled Drugs and Substances Act* (Canada), other than the production of industrial hemp in accordance with the Industrial Hemp Regulations under that Act.

**Interpretation:**

s.13;s.16

**Current state/situation related to medicinal marihuana:**

Cannabis has been excluded as qualifying agricultural use because it is listed as a narcotic under the *Controlled Drugs and Substances Act*.

**Assumption about proposed federal regulations:**

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Page 0823 of 1060

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Page 0824 of 1060

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# **BC Local Government Attitudes Towards the Legalization and Regulation of Marijuana in Canada**

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**Local Government Feedback to the Union of BC Municipalities’  
*Survey on the Legalization & Regulation of Marijuana***

May 19, 2017

Page 0826 of 1060 to/à Page 0846 of 1060

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# LEGALIZATION & REGULATION OF CANNABIS

## Policy Summary

## Production Facilities on Agricultural Land Reserve

### KEY POLICY DECISION(S) REQUIRED:

1. TO WHAT EXTENT SHOULD THE PROVINCE REGULATE CANNABIS PRODUCTION ON THE AGRICULTURAL LAND RESERVE (ALR)?

### FEDERAL TASK FORCE RECOMMENDATIONS

- N/A

### BILL C-45

- Bill C-45 does not address the ALR issue directly. However, Bill C-45 does assert federal government authority to regulate cannabis production, including licensing of producers, establishing product standards, and related inspection authority.
- Bill C-45 continues the existing regulatory framework for non-medical cannabis production (the *Access to Cannabis for Medical Purposes Regulation*) for at least the next 5 years. As well Bill C-45 incorporates *Industrial Hemp Regulations*.

### BACKGROUND

Within BC, both the provincial government and local governments have powers to regulate land use, including agricultural land.

- At the provincial level, BC has followed a formal policy of preservation of agricultural land since 1973 through the *Agricultural Land Commission Act* (ALCA) and the *Agricultural Land Reserve Use, Subdivision and Procedure Regulation* (the “Regulation”).
- Local governments regulate land use through their powers for community planning and zoning bylaws.

The ALR covers about 5 percent (or 4,615,880 hectares) of the provincial land base.

In 2013, the Agricultural Land Commission (ALC) issued an information bulletin in which it adopted the position that, based on the broad definition of “farm use” under the ALCA, the lawful production of medical cannabis qualified as a farm use. The ALC cautioned, however, that not all buildings associated with medical cannabis production may be consistent with being an accessory to farm use.

Currently, the production of medical cannabis in accordance with the federal *Access to Cannabis for Medical Purposes Regulation* (ACMPR) is specified as a designated farm use under the Agricultural Land Reserve use, Subdivision and Procedure Regulation. As a designated farm use, local governments can regulate – but not prohibit – medical cannabis production on the ALR.

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# LEGALIZATION & REGULATION OF CANNABIS

## Policy Summary

## Production Facilities on Agricultural Land Reserve

### KEY POLICY DECISION(S) REQUIRED:

1. SHOULD COMMERCIAL PRODUCTION FACILITIES FOR MEDICAL CANNABIS CONTINUE TO BE PERMITTED ON THE AGRICULTURAL LAND RESERVE (ALR)?
2. SHOULD COMMERCIAL PRODUCTION FACILITIES FOR NON-MEDICAL CANNABIS BE PERMITTED ON THE ALR?

### FEDERAL TASK FORCE RECOMMENDATIONS

- N/A

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The ALR covers about 5 percent (or 4,615,880 hectares) of the provincial land base. Currently, medical cannabis production facilities licensed under the federal Access to Cannabis for Medical purposes regulation (ACMPR) ~~Marijuana for Medical Purposes Regulation (MMPR)~~ are a designated farm use of ALR. As a designated farm use, local governments can regulate – but not prohibit – medical ~~marijuana~~ cannabis production on the ALR.

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# LEGALIZATION & REGULATION OF CANNABIS

## Policy Summary

## Production Facilities on Agricultural Land Reserve

### KEY POLICY DECISION(S) REQUIRED:

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~~AGRICULTURAL LAND RESERVE (ALR)?~~
2. ~~SHOULD COMMERCIAL PRODUCTION FACILITIES FOR NON-MEDICAL CANNABIS BE PERMITTED ON THE~~  
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Currently, the production of medical cannabis in accordance with production facilities licensed under the federal *Access to Cannabis for Medical Purposes Regulation* (ACMPR) Marijuana for Medical Purposes Regulation (MMPR) are is specified as a designated farm use under the Regulation. of ALR. As a designated farm use, local governments can regulate – but not prohibit – medical ~~marijuana~~ cannabis production on the ALR.

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# LEGALIZATION & REGULATION OF CANNABIS

## Policy Summary

## Production Facilities on Agricultural Land Reserve

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~~COMMERCIAL PRODUCTION FACILITIES FOR MEDICAL CANNABIS CONTINUE TO BE PERMITTED ON THE~~  
~~AGRICULTURAL LAND RESERVE (ALR)?~~
2. ~~SHOULD COMMERCIAL PRODUCTION FACILITIES FOR NON-MEDICAL CANNABIS BE PERMITTED ON THE~~  
~~ALR?~~

### FEDERAL TASK FORCE RECOMMENDATIONS

- N/A

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## **Production Facilities on Agricultural Land Reserve**

### **Key Decision(s)**

- ~~Should commercial production cultivation of non-medical cannabis be permitted on the Agricultural Land Reserve (ALR)?~~
- ~~Should commercial cultivation production facilities for medical cannabis continue to be permitted on the ALR?~~
- Should commercial production facilities for non-medical cannabis be permitted on the Agricultural Land Reserve (ALR)?

### **Federal Task Force Recommendation**

N/A

### **Bill C-45**

- Bill C-45 does not address the ALR issue directly. However, Bill C-45 does assert federal government authority to regulate cannabis production, including licensing of producers, establishing product standards, and related inspection authority.
- Bill C-45 continues the existing regulatory framework for non-medical cannabis production (the Access to Cannabis for Medical Purposes Regulation) for at least the next 5 years.
- Bill C-45 continues the current regulatory framework for Industrial Hemp.

### **Background**

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- At the provincial level, BC has followed a formal policy of preservation of agricultural land since 1973, as expressed through the *Agricultural Land Commission Act* and the *Agricultural Land Reserve Use, Subdivision and Procedure Regulation*.
- Local governments also play an important role in land use, through their powers for community planning and zoning bylaws.

The ALR covers about 4,615,880 hectares (or 5 percent) (or 4,615,880 hectares) of the 94,646,000 hectare provincial land base. Currently, medical cannabis production facilities licensed under the federal Marijuana for Medical Purposes Regulation (MMPR) are a designated farm use of ALR. As a designated farm use, local governments have the ability to regulate – but not prohibit – medical marijuana production in the ALR, and about 49 percent of that land is Crown land, which makes up X% of BC's arable land base. While commercial medical cannabis production on the ALR is currently permitted,

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## Production on Agricultural Land Reserve

### Key Decision(s)

- Should commercial ~~production~~cultivation of non-medical cannabis be permitted on the Agricultural Land Reserve (ALR)?
- Should commercial ~~cultivation~~production of medical cannabis continue to be permitted on the ALR?

### Federal Task Force Recommendation

N/A

### Bill C-45

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### Background

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# Cannabis Legalization & Regulation Project

## Production Sub-working Group

The primary functions of Sub-Working Group members are to:

- Determine the impact of federal legislation and regulations on current provincial policies and legislation related to production and processing, including land use, categories of production and processing licences, production practices, and monitoring and compliance).
- Conduct in depth analysis into the license categories of micro-cultivation and micro-processing of non-medical cannabis and identify areas that may require additional policy development.
- Identify any other potential impacts related to cannabis production and processing, such as environmental impacts, resources consumption, labour, and others, and make recommendations on how to mitigate these impacts.

The following will be developed in consultation with the Secretariat and IMWG:

- A work plan that identifies key policy decisions required prior to and after July 2018
- A policy options document that identifies key policy issues, analyzes options, and makes recommendations on preferred option.
- Additional tasks as delegated by the Inter-ministry Working Group.

## Key Policy Questions

### PRODUCTION

**ISSUE:** To ensure provincial goals for public health and safety and economic development are met, what level of provincial oversight should the province have in cannabis production?

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# Cannabis Legalization & Regulation Project

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## **1) Agricultural Reserve Land Use**

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## **2) Local Government and Cannabis Production and Processing**

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## **Cannabis Legalization & Regulation Project**

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### **3) Economic development of Cannabis Production and Processing**

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### **4) Good Production Practices**

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### **5) Additional policy question related to communication of provincial policy decisions around production.**

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## Cannabis Legalization & Regulation Project

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I have more questions than comments.

On page 20 they indicate the regulations would require notice to local government, fire and policing authorities. It does not appear as if we (either AGRI or ALC) would receive notice. Should we expect to be notified?

From a farm practices complaint perspective I see that on page 21 they indicate 'regulations would require reasonable measures to prevent the escape of odours and pollen'. I'm glad to see this listed as I anticipate odour complaints are quite likely to occur. Would this apply to micro cultivation sites as well as standard sites? Since we sometimes receive farm practice complaints that fall outside the three majors: noise, dust and odour – I'm wondering if there are other aspects of cannabis production or processing that would lead to complainants feeling compelled to call our offices to hear their concerns? I did notice that this requirement to prevent escape of odours pertains to indoor operations, would there be outdoor operations in BC? If so, would the odour from an outdoor site be objectionable to neighbours?

One of the issues raised by RD Central Kootenay when neighbours contacted them with their concern about an alleged recreational cannabis facility was access to irrigation water for production. In this particular instance, the small community water distribution system is already over subscribed. Not something that will be impacted by this federal regulation I suppose but a likely cause of friction in some parts of this province.

Since not all parts of the plant are utilized what requirements would apply to the waste portion of these plants? Would it be burned, composted, baled or used in manufacturing for some other purpose? Can it be integrated into agricultural production systems without a licensing requirement – not sure how appropriate this type of cannabis would be for livestock bedding.

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I have had a scan (very quick scan) through it and have the following comments/questions in case they are of use to you; as a heads up to you be advised I have not been heavily involved in this file or the previous MM file so have a very basic background on this topic.

- I am hearing more expressions of interest related to industrial hemp production and novel uses including interest relating to its potential as a fiber source for multiple uses including secondary use as alternate fuel to wood fibre. As a result there could be interest in both cultivation and processing/R&D to look at new products. Also micro-processing for hemp products.

- Section 2.2.4 may want to specifically include fiber/other hemp uses
- Page 11 indicates that could have >1 activity per site (e.g. cultivation, process, and sale); if this is case how will this be dealt with if site is in ALR? E.g. is it possible that could have equivalent of winery and bistro?
- Document indicates that there would be no proposed limit on amount of cultivation allowed under one license (p12) however this seems somewhat at odds with the goal of diverse competitive industry with both small and large players across country. In terms of economic diversification/alternate crops a couple of major players could account for majority of supply.
- Page 17 refers to testing for unauthorized pesticides – when will list of authorised ones be available, are their pesticides currently labeled for use with cannabis?
- Related to good production practices; is there an expectation that other practice recommendations e.g. waste management/BMPs... will be put in place on national scale or established at provincial/local scale.
- Section 2.3.1 speaks to notice to local authority, is this purely notification or will LA have power to prevent/limit? We received lots of feedback regarding concerns tied to medical production and would expect similar response and potentially related bylaw/zoning issues in relation to cannabis (non-medical) cultivation, processing, sale).
- Is there an expectation that cannabis will be treated as farm crop/sector in relation to F/T/P programs and if so is there an expectation of increased resourcing for program development/modification?
- Would 3<sup>rd</sup> party service providers e.g. transportation company be covered by other's (e.g. the cultivator or processor) license?

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One issue that I learned about when I attended a presentation on cannabis is how waste is handled. At the moment, the medical marijuana facilities in the area take their spent/diseased plants in bags to the landfill. Is there a way to address how waste is handled and the need for having on-farm composting facilities or something to that effect? I just see that a lot of unnecessary waste could end up in our landfills, and that there is no control over the product once it leaves the growing facilities.

It also seemed to me that most production will most likely expand indoors/in greenhouses, taking advantage of the controlled environment for disease and pest control.

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## **Section 2.2.1 Standard Cultivation and Section 2.2.2 Micro-Cultivation, pages 12 and 13**

I appreciate the stated desire to enable the participation of small-scale growers in the legal cannabis industry. However, I'm unconvinced that classifying growers as standard or micro will achieve the stated desire. Similar risks and security requirements will exist regardless of the scale of production so licensing producers as standard or micro may end up being more of an administrative exercise than a real benefit to small growers.

### **Section 2.3.3 Location, page 20**

Strongly support prohibiting any licensed activity in a dwelling.

I'm concerned that permitting outdoor cultivation will lead to increased security concerns and a proliferation of odour complaints. I understand that physical security will be required for the site but outdoor production will still look like a more tempting target for theft than will indoor production. I'm also concerned that the physical security requirements (fencing, physical barriers) for an outdoor field will lead to many such structures being constructed within the ALR. This, in turn, may lead to the field being less attractive for conversion to other types of agriculture in the future if the cannabis production fails for any reason.

### **Section 2.3.6 Good Production Practices, page 26**

Add a requirement for odour control or make provision for other levels of government to do so. This will help neighbours and local governments have improved confidence that they won't have to live with all of the unintended negative impacts brought about by the new regulatory climate.

s.15;s.19

I share s.15;s.1; concern that the regulation does not address use of ALR in the location discussion. Large greenhouse production, manufacturing & storage facilities will be permanent vs temp so will have significant impact to ALR availability & potential production. Local gov't in the OK want to restrict the large operations to Industrial zoning. I had a guy call the other day proposing a MM operation & said he understood "ALR was the preferred place to locate it" & the City wanted him to locate in industrial zone. I think it is a concern for preferred location to be Ag land. I'd support the regulation restricting non-soil based operations to be on non-ALR but that is probably not in their scope to include in this regulation? Maybe we should share this concern with ALC to help them develop their policy – can we do that??

Other comment is around all the physical barrier requirements, security, access criteria & surveillance requirements in the proposed Reg – should be include clearly in the Regulation whose responsible to monitor/enforce.

Comments on the 4 questions at the end

1. enforcement will be key initially if precedent is set will be hard to change what becomes accepted norm.

2. Cultivation threshold should be size of growing area & total production - revenues & #s of plants are too difficult to monitor or control.

3. Processing threshold based on total production & onsite inventory (revenues etc. are too variable)

4. ensuring compliance with rules and requirements will be biggest challenge to health & safety but Reg does not really address that.

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I've made a cursory review of the document – looking for a consideration of the location of cannabis growing facilities. I am concerned about the potential impact of this activity on ALR land – particularly given the \$\$ involved and likelihood of speculation coupled with the reality that much of the production will not be soil-based and will require significant infrastructure requirements. Does this or can this regulation consider the location of these facilities on ALR land? If it doesn't, how is this issue being considered?

I have a number of local governments who are struggling with this issue as they begin to see the initial wave of applications.

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In my region there are both large and small producers of cannabis for the recreational and medicinal market. The production is largely hidden and does not necessarily correspond to licensing, current zoning or land use regulations. This has caused a few issues over the years primarily from nuisance complaints regarding odour. I see comparison's to the current requirements for wineries cideries and breweries and support the linkages to the Agricultural Land Commission and Ministry of Agriculture legislation for micro-cannabis producers as they are for the alcohol industry.

Below are a few requirements for obtaining manufacturing license for alcohol linked to requirements for production on farmland. <https://www2.gov.bc.ca/assets/gov/employment-business-and-economic-development/business-management/liquor-regulation-licensing/guides-and-manuals/manufacture-handbook.pdf>

- In order to be considered eligible to get a manufacturers license you must have enough space and equipment to ferment at least 4,500 litres (6,000 bottles of wine) per year.
- Additional license requirements to sell on-site, hold events etc.
- Different licences required for production, agency and retail sales
- To have a land based operation 2 acres of production associated with the license required

- At least 25% of the product has to come from land owned or leased by the operation
- Direct sales and tasting are permitted with restrictions
- A land based operation cannot share ownership with a commercial winery
- Federal and provincial labelling rules apply
- Product quality, contents, advertising and many other aspects are all strictly controlled

#### Agricultural Land Commission:

- Policy L-03 Wineries and Cideries, in the ALR references back to the manufacturers Licence under the Liquor Control and Licensing Act, other policies also apply
  - ALC Policy L-21 Activities Designated Farm Use: Brewery and Distilleries and Meadery
  - ALC Policy L-04 Activities Designated as Farm Use: Agri-tourism Activities in the ALR
  - ALC Policy L-22 Gathering for an Event in the ALR

#### Agricultural Waste Control Regulation

- agricultural operation" means any agricultural operation or activity carried out on a farm including
  - (a) an operation or activity devoted to the production or keeping of livestock, poultry, farmed game, fur bearing animals, crops, grain, vegetables, milk, eggs, honey, mushrooms, horticultural products, tree fruits, berries, and
  - (b) the operation of machinery and equipment for agricultural waste management or application of fertilizers and soil conditioners;

#### The first 4 questions relate to agriculture concerns:

1. I think the different licences proposed supports what is happening in the BC liquor industry. If cannabis field and greenhouse production is going to be permitted a linkage to the Agricultural Land Commission, BC Farm Industry Review Board and applicable Ministry of Agriculture legislation should be a requirement.
2. When it comes to production on ALR land maintaining a minimum and a maximum for commercial production on a small scale tied to the land base should be required. For example the current requirement for 2 acres under production to qualify as a land based winery. If there is no land based production a winery would require an application to the ALC for a non-farm use to locate on a property in the ALR. This is a way to control scale, production methods and associated activity.
3. Comparisons made by the micro cannabis industry to the micro-brewing industry should be evaluated. There are clear distinctions on what constitutes a micro brewer based on production amount, place of origin and ownership. <http://www.agr.gc.ca/resources/prod/Internet-Internet/MISB-DGSIM/ATS-SEA/PDF/6728-eng.pdf> . Most micro-brewers currently are not tied to land based production of inputs although opportunities are opening up with the adoption of ALC Policy L-21.

4. Experience has shown that for any type of production comes with concerns often related to scale. A good example is the production of mushroom compost or cannon's for vineyard bird control. These are lessons learned that can be applied to the production of cannabis in farming areas. Identify the risks and built in mitigation requirements prior to going operational. This can be done based on operational scale, site selection or production methodology. From a front-line perspective it would be better to error on the side of caution and built a knowledge base in order to move forward with the least amount of controversy.

s.15;s.19

I do not see any major issues but cannabis production is not my area of competence. Some general comments:

Maybe it should be stressed that the production and processing must be in compliance with provincial land use and agricultural regulations. In particular, I am not sure I read something about retail on farmland. This is just a proactive comment to avoid that producers use the federal legislation to trump provincial legislation in this regard.

I am not sure how the 0.3% THC allowed for hemp production will be controlled and who will do it. Or is that left to the provinces to flesh out?

s.15;s.19

I scanned the document and I have the following comments:

1. The issue around micro growers is very difficult. We have found that using gross receipts as a guideline for regulating activities on the ALR very difficult and very hard to enforce. However, it is easier to enforce size of growing area. So I suggest using size of growing area.
2. Micro-processing is also very difficult. I think that we are really beginning to deviate from the initial intent to make farms more viable by allowing processing on the ALR through a 50% rule. We have seen a lot of creep into large very commercial scale processing on the ALR that are misplaced and changing parcels from growing operations to commercial processing operations that have a huge tax advantage over businesses in the industrial zone. I think instead of 50% rules we should be using area rules. The growing area that a farmer has must exceed xx ha of that product and the processing that a farmers is allowed to do cannot exceed xx m2. Otherwise the farmers must go to the industrial zone where there is proper sanitation, water servicing and wastewater servicing, and in this case, proper security as well.

I see processing might be a big problem here. It would be best if there were processing facilities set up in the industrial zone to accept product from micro growing facilities. This would ensure consistency in grading, tracking and packaging the product.

Another option might be to allow no processing on the ALR due to security and quality control concerns. It would be so hard to police on the ALR. The argument that allowing some processing (the impossible to enforce 50% rule) to make a farm operation more viable does not hold with this product. It is very valuable and growers do not need to process it.

Tracking of product processed at micro operations would be very difficult if not impossible I think.

3. Security clearances needed to get near these operations may make it difficult to impossible for us to deal with a nuisance complaint as we would not be able to inspect the operations.

I don't have a good feel of the threshold between micro growers and commercial growers but I think it should be done in terms of area.

Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
FIN	Miscellaneous		1.4	n/a	Has the federal government prepared any cost projections related to the regulatory framework?	
LDB	Licences/ Authorizations	Storage	2	4	Will licensees be permitted to store cannabis off-site (in a different location than their own facility)?	
Secretariat	Licences/ Authorizations		2	n/a	Could a retailer also be a processor in the sense that they could package product in unique ways for their customers (for example, buying cannabis in bulk and packaging it in different gram amounts, or creating “sample” packs with different cannabis strains)?	
Secretariat	Licences/ Authorizations		2	n/a	“Federally licenced seller or provincially- or territorially-authorized sellers”. “Sellers” is not defined in the consultation paper. Are sellers supposed to be provincially-licenced retailers only, or can they include provincial wholesale distributors (e.g. LDB)?  a. Can federally-licenced cultivators sell to provincial wholesale distribution agencies (e.g. LDB)? b. Can federally-licenced processors sell directly to a provincial retail store without the involvement of a provincial wholesale distributor?	
Secretariat	Licences/ Authorizations		2	n/a	Is the federal government intending to impose any requirements on the access of individuals under 18 to places where cannabis is cultivated, propagated, harvested, processed, packaged, stored, distributed, sold or supplied – or will such access be restricted only through the rules on promotion and advertising?	
Secretariat	Licences/ Authorizations		2	n/a	Is the federal government intending to impose any requirements or restrictions on the employment of individuals under 18 by licensed producers or others? What about by law enforcement or others in compliance operations?	



Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
AGRI	Licences/ Authorizations	Licensed Activities	2	n/a	Table 1, page 19: Why is research and development considered a supplemental activity of a selling licence? What type of research does Health Canada envision will be conducted by a seller of cannabis? This has implications on how the province also undertakes and collects research without understanding what is occurring in the industry and the federal government. There will need to be transparency on how this is occurring and being funded and reported out on.	s.13
AGRI	Licences/ Authorizations	Licensed Activities	2	n/a	Table 1, page 19: What is the rationale for a cap of THC levels in micro cultivation? Why is there no cap on THC levels for standard cultivation of non-medical cannabis and/or additional security requirements for producers and or processors of high THC product?  There is a lack of clarity on the policy intent of this requirement as proposed.	
AGRI	Licences/ Authorizations	Licensed Activities	2	n/a	Table 1, page 19: Will micro-cultivators be able to apply for federal licence to sell products for medical purposes to registered clients?  Lack of clarity on whether micro cultivation licenses will be available for medical cannabis producers. As well whether or not micro cultivators of medical cannabis will be able to apply for federal licence to sell.	
AGRI	Licences/ Authorizations	Licensed Activities	2	n/a	Table 1, page 19: Would 3rd party service providers e.g. transportation company be covered by other's (e.g. the cultivator or processor) license?  Needed to inform the provincial policy development on the distribution and retail system.	

Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
Secretariat	Licences/ Authorizations		2.2	n/a	"In general, there would be no restriction on the ability of a single person (either an individual or organization) to be authorized to conduct multiple activities per site. For example, a person could be authorized to conduct one or more activities (for example, cultivation, processing and sale to the public)." s.13 s.13	
Secretariat	Licences/ Authorizations		2.2	n/a	Can licence holders be licensed/authorized for more than one activity at a time? I.e., a producer also has a processing licence	
FIN	Licences/ Authorizations		2.2	n/a	Are there any limitations or minimums to the number of licences in a particular region?	
FIN	Licences/ Authorizations		2.2	n/a	Are there different licensing requirements for recreational vs. medical cannabis?	
FIN	Licences/ Authorizations	Cultivation	2.2	n/a	What are the proposed criteria to determine standard vs. micro classification? Suggest kilograms of production per year	
FIN	Licences/ Authorizations	Nurseries	2.2	n/a	Do seeds come from mature plants? How is flowering material/buds managed?	
FIN	Licences/ Authorizations	Sale to Public	2.2	n/a	Can medical licensees only sell to registered clients for medical purposes?	
AGRI	Licences/ Authorizations	Cultivation	2.2	n/a	Will it be possible for cultivators to also apply for a retail licence?	
FIN	Licences/ Authorizations	Cultivation	2.2.1	n/a	Paragraph 2 – No limits on production unless reasonable grounds to believe a licensee was producing more than they were legally able to sell  Why not restrict production for all cultivators?	
FIN	Licences/ Authorizations	Nurseries	2.2.3	n/a	Nurseries are prevented from selling to the public. Where do individuals buy seeds/seedlings/plants? What type of licence would existing seed suppliers be covered under?	

Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
AGRI	Licences/ Authorizations	Nurseries	2.2.3	n/a	What is the rationale for the level of security required for a nursery to be lower than a standard cultivator? If a nursery is producing seeds, they could have a large number of flowering plants onsite. This would not be a concern if the plants are hemp, but could be if they are 'high THC' cannabis. In general, commercial growers of 'high THC' cannabis use clonal seedlings to establish a crop; these crops are not started from seeds.	
AGRI	Licences/ Authorizations	Nurseries	2.2.3	n/a	What is the policy intent of the nursery licence category for clonal seedlings as this can most likely be met by a standard cultivator?  Facilities that have a standard cultivation or micro-cultivation licence are permitted to sell cannabis seedlings/plants to other operators. The only value of a nursery category is for the production of pedigreed seeds to serve the hemp sector. There is a question on whether there will be a market for seedlings produced by a custom propagator. The lone advantage to apply for a nursery licence is the reduction in security, but that only applies to standard and not micro-cultivation. A commercial propagator of cannabis would likely apply for a micro-cultivation licence providing the maximum flexibility with no additional costs (for security), depending on the size of the threshold.	
FIN	Licences/ Authorizations	Processing	2.2.5	n/a	Are there any restrictions to holding multiple licence types? Assuming that a licensed producer can also be a licensed processor.	
AGRI	Licences/ Authorizations	Micro-processing	2.2.6	n/a	Will industrial hemp cultivation licence holders be able to hold a micro processing licence (e.g. processing CBD products)?	
FIN	Licences/ Authorizations	Testing	2.2.9	n/a	Do labs exist in all regions? Will third party labs significant impact producer costs?	
Secretariat	Testing		2.2.9	n/a	Page 17: "Licensed producers can conduct their own in-house testing". Is there guidance on "validated testing methodologies"? Who/which body will validate these methodologies? Are there any third-party laboratories located in BC eligible to obtain the proposed federal analytical testing licence?	

Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
AGRI	Licences/ Authorizations	Testing	2.2.9	n/a	When will the list of authorized pesticides be available for provincial governments to review?  The requirement for mandatory pesticide testing should be revisited once the industry is more mature and more legal products are available; i.e. treat it like any other crop in its category with audit testing. This could take some time, since most major chemical companies are hesitant to register products on cannabis due to the more stringent and costly requirements, and due to the high value of the crop (high value = potential costly liability if something goes wrong, such as crop damage or lack of control).	
Secretariat	Licences/ Authorizations	Import/ Export	2.2.10	n/a	"Import/Export" which would authorize the import or export of cannabis for "scientific purposes": will scientific purpose be defined? How is it distinct from the research category?	
FIN	Licences/ Authorizations	Import/ Export	2.2.10	n/a	Is there a domestic supply test for exports, or any other requirements for export permits?	
Secretariat	Licences/ Authorizations	Research	2.2.11	n/a	What entities are contemplated to be eligible for a research authorization and will there be any restrictions on the type of research done?The question arises in the context of minors - there will be provincial restrictions on the employment of minors by federal licence holders and we need more information about the research authorizations to know if any restrictions with respect to minors ought to be contemplated.	
FIN	Licences/ Authorizations	Requirements	2.3	n/a	Are there terminations provisions in the licence?	
Secretariat	Licences/ Authorizations		2.3.1	n/a	Obtaining a federal licence will require notifying local authorities. Will the notice have to be given before a licence is obtained - i.e. is it a notice of intention to apply for a federal licence? Will the federal licence still be given if notice is provided, but local authorities say they do not want the facility to operate in their community?	
FIN	Licences/ Authorizations	Notification	2.3.1	n/a	Notice to local authorities: will the provincial government be provided notice?	

Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
					s.13	
AGRI	Licences/ Authorizations	Notification	2.3.1	n/a		
FIN	Licences/ Authorizations	Validity Period	2.3.2	n/a	Proposed licence period is five years; what's the licence renewal process?	
					Are any licenced activities permitted on a dwelling-lot?	
AGRI	Licences/ Authorizations	Location	2.3.3	n/a	Will help to inform the policy and regulatory framework for the legislation on right to farm around "normal farming practices" related to the location of production.	
AGRI	Licences/ Authorizations	Location	2.3.3	n/a	What would be "reasonable measures to prevent the escape of odours and pollen" for cannabis indoors whether cultivated, dried, stored or processed?	
AGRI	Licences/ Authorizations	Location	2.3.3	n/a	Would any consideration be given to limit impact of odours of outdoor-grown cannabis (i.e. set-backs from property lines)?	
AGRI	Licences/ Authorizations	Location	2.3.3	n/a	Would prevention of odours apply equally to different levels of cultivation and processing related to the location (e.g. outdoor cultivation)?	
Secretariat	Licences/ Authorizations	Physical Security	2.3.4	n/a	Does "perimeter of the site" include the technical property line or if a fully indoor operation, only the perimeter of the building, etc?	
Secretariat	Licences/ Authorizations	Physical Security	2.3.4	n/a	Will there be any published minimums for physical barriers required for security?	

Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
Secretariat	Licences/ Authorizations	Physical Security	2.3.4	n/a	Consider impact to workers on-site/operations during the day to have a detection system always in operation. How does this work logistically?	
Secretariat	Licences/ Authorizations	Physical Security	2.3.4	n/a	Page 22: when dealing with securing storage area and having to track the identity of every person entering/exiting the area - Is this to be recorded each time a person enters or exits the area in a day?	
Secretariat	Licences/ Authorizations	Physical Security	2.3.4	n/a	Page 21/22 - requirement to keep visual recordings for 1 year – Are there any concerns related to FOIPPA? (e.g. recording people without permission? Staff might be required to give permission as condition of their employment?)	
AGRI	Licences/ Authorizations	Physical Security	2.3.4	n/a	What are the benefits and risks of reducing security requirements for micro-cultivation?  Cannabis is such a high-value crop that even a relatively small production area has a very high value. For instance, about \$0.5 million (retail value) worth of cannabis could be produced in a 1,000 sq. ft. production facility.	
Secretariat	Licences/ Authorizations	Personnel Security	2.3.5	n/a	Regulations specify that only individuals in "key positions" will be subject to security clearances. However, these positions are very specific and we'd like to know if the federal government intends to require all workers who participate in the cannabis industry to have security clearances, or at the very least, criminal record checks?	
Secretariat	Licences/ Authorizations	Personnel Security	2.3.5	n/a	Section 2.3.5 also speaks to a requirement for standard cultivation, micro-cultivation, nursery, standard processing, micro-processing, and federal sale licenses to create and maintain a "standard operating procedure" to prevent cannabis from being diverted to an illegal market or activity. Does the federal government plan on setting criteria through regulations for the standard operating procedures, which may or may not include a requirement for a criminal record check for employees.	
Secretariat	Licences/ Authorizations	Personnel Security	2.3.5	n/a	Page 24: what defines a "senior" or "key" position? Anything outside of what is discussed below?	

Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
Secretariat	Licences/ Authorizations	Personnel Security	2.3.5	n/a	Page 24: For the security plan - would there be a prescribed form to submit? Is the identification of the individual occupying each key position to include the first and last name or a SIN, etc.?	s.13
Secretariat	Licences/ Authorizations	Personnel Security	2.3.5	n/a	Page 25: Is there a time frame for notification of change in key position (ie: within 3 months)? Does notification need to be in a prescribed form or method (ie: in writing)	
Secretariat	Licences/ Authorizations	Personnel Security	2.3.5	n/a	Page 25: "owner of the site" – is this the owner of both the land and building?	
Secretariat	Licences/ Authorizations	Personnel Security	2.3.5	n/a	Page 25: (iv) Does this extend to a person that is in a position to legally bind the shareholders? directors? officers? In the case of a corporation the applicant and the license holder would be the same, no?	
Secretariat	Licences/ Authorizations	Personnel Security	2.3.5	n/a	Page 25: At least one individual holding a security clearance to be on site during normal business operations - Will this need to be logged and submitted for enforcement? Are there penalties if not upheld?	
Secretariat	Licences/ Authorizations	Personnel Security	2.3.5	n/a	Page 25: What is the impact to the applicant if additional positions/individuals are identified? Will the application be held in order of receipt? Will there be a fast track for obtaining additional security clearances? Will the process begin all over again?	
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a	How many samples would have to be tested per crop / batch?	
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a	Are testing labs (or the producer) required to notify the Minister if a sample fails a pesticide etc. test?	
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a	What is the process for reporting failed analytical tests?	
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a	Is there an expectation that other practice recommendations e.g. waste management will be put in place on national scale or established at provincial/local scale?	

Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a	Since not all parts of the plant are utilized, what requirements would apply to the waste portion of these plants? Would it be burned, composted, baled or used in manufacturing for some other purpose? Can it be integrated into agricultural production systems without a licensing requirement?	s.13
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a	How is the federal government proposing to monitor and enforce good production practices?	
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a	Will there be a federal program in place to respond to complaints of all types of cultivation, including 'designated producer' sites? What will be the process for concerns expressed by those impacted from production practices (i.e. neighbourhood odour complaints)? What enforcement resources will be provided and how?	
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a	How will both provincial and federal regulations related to good production practices coordinate together in practice?	
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a	What role will provincial legislation and administrative tribunals play regarding farm practices nuisance complaints and local government bylaws?	
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a	Is the federal government anticipating having cannabis specific tribunals regarding these federal regulations and federally licenced production facilities?	
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a	Will the federal government be gathering scientific evidence with respect to production and good production practices that will be shared with the provinces?	
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a	The proposed regulations state, "for processing licenses, a quality assurance person must be employed. That person must have appropriate training, experience and technical knowledge". Would these training, knowledge and expertise requirements differ between standard and micro-processors?	
Secretariat	Licences/ Authorizations	Record Keeping and Reporting	2.3.7	n/a	Page 28 - Providing information about adverse reactions: what kind of information? Do we have a privacy concern here?	



Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
Secretariat	Licences/ Authorizations	Record Keeping and Reporting	2.3.7	n/a	Page 28 - Providing information about promotional material: what kind of information is required? (i.e., copy of print ad, radio ad, etc.)	s.13
AGRI	Licences/ Authorizations	Record Keeping and Reporting	2.3.7	n/a	Who would be responsible for monitoring record keeping and how (i.e. onsite or off-site)?	
FIN	Licences/ Authorizations	Import/ Export	2.4.1	n/a	Will imports of recreational cannabis be allowed?	
Secretariat	Security Clearances		3	n/a	Page 35: will "unacceptable risk" be defined further or rely on ministerial discretion?	
Secretariat	Security Clearances	Record Checks	3.3	n/a	Page 36: Will the criteria used for consideration be published?	
Secretariat	Security Clearances	Record Checks	3.3	n/a	Page 36: Will "relevant files of law enforcement" be defined?	
Secretariat	Security Clearances	Record Checks	3.3	n/a	Page 36: Will there be a record introduced to the applicant's law enforcement files, indicating successful or unsuccessful application? Could this be used for other purposes that the applicant is unaware of? Is there any inter-agency implications...i.e., will other law enforcement notify the minister if there is a change in the applicant's law enforcement files that were reviewed at the time of application?	

Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
Secretariat	Security Clearances	Record Checks	3.3	n/a	<p>Pages 37/38/39:</p> <p>a. what kind of information sharing will be needed, or is currently available, to make sure the federal government has access to BC-specific information that could affect granting of a security clearance?</p> <p>b. Will BC be able to impose its own security clearance requirements on a federal licensee, or override the federal government's decision to grant a clearance? E.g. what if BC wants the security clearance period to be less than 5 years?</p> <p>c. Validity Period – could an individual reapply for a security clearance after the expiration period?</p> <p>d. Refusal to grant security clearance – Will this be defined or determined on a case by case basis at the discretion of the minister? (same for suspension/cancellation)</p> <p>e. Will an appeals provision be included? (same for suspension/cancellation)</p>	
MIRR	Security Clearances		3.8	n/a	<p>Would the requirement to obtain and maintain a security clearance apply to elected officials who by virtue of their position may be considered a Key Position, Directors and officers? (e.g. would a Chief or Councillor be required to obtain a clearance if there band had a Cannabis business? This also might be a consideration for any public sector owned business involved in Cannabis)</p>	
AGRI	Security Clearances	Application Process	3.8	n/a	<p>Would provincial staff who provide industry support require security clearances in order to enter licensed production and processing facilities e.g. Regional Agrologists?</p> <p>s.13</p>	
LDB	Cannabis Tracking		4	12	When will the federal tracking tool be implemented?	

Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
LDB	Cannabis Tracking		4	12	What data will BC be required to report into the tracking tool?	
LDB	Cannabis Tracking		4	12	Would BC have an MOU with the federal government for information-sharing?	
Secretariat	Cannabis Tracking		4	n/a	Will an information sharing agreement be required for BC to receive the information that the federal government “may” disclose under s. 83(a) of the federal Cannabis Act (information related to the Cannabis Tracking System). • The Minister “may disclose it to the government of a province or a public body established under a provincial Act if the disclosure is for a purpose related to verifying compliance or preventing non-compliance with the provisions of a provincial Act that contains the legislative measures referred to in subsection 69(3);”	
FIN	Cannabis Tracking		4.3	n/a	Can we be provided with a demo of the existing system?	
FIN	Cannabis Tracking		4.3	n/a	Has a system like METRC been considered?	
FIN	Cannabis Tracking		4.3	n/a	Are there any cost projections for the tracking system?	
FIN	Cannabis Tracking		4.3	n/a	Will provinces have access to the data?	

Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
HLTH	Products/ Product Standards	Dosage/ Minimum Unit	5	n/a	Has the federal government considered defining a minimum unit, or standard dose e.g. similar to how a standard drink has been defined for alcohol consumption? This would be necessary to implement Minimum Unit Pricing which will be an important tool to keep the price of cannabis from dropping precipitously if left to market forces due to competition in the industry. We note that the consultation document refers to 10 mg of THC as a “single unit”, but are unsure of the evidence base for this, and have some concerns about basing this on US jurisdictions and medical cannabis experience (which are likely heavy users). We would prefer an evidence-based, public health oriented standard unit which would be something like the maximum safe dose of THC for novice/infrequent users for most to avoid negative experiences.	s.13
AGRI	Products/ Product Standards	Product Classes	5.2	n/a	Will all of these products be classified as regular agriculture or food products?	
HLTH	Products/ Product Standards	Product Types	5.3	n/a	We would like clarification on how the federal government is proposing to regulate product forms i.e. will all product forms be prohibited, and then certain forms allowed, or will all product forms be allowed, except those that are prohibited? Wrt to pre-rolled cigarette cannabis joints, it would be helpful to know the rationale for this particular product. People seem to manage bulk products just fine, so is there a demand/ need for cigarette joints?	
MCFD	Products/ Product Standards	Potency	5.3	8	Do the proposed THC limits allow for minimal health and safety risks in the case of accidental ingestion of a product by a young person?	
Secretariat	Packaging & Labelling	Product Marking	6	n/a	Will there be any marking scheme (similar to tobacco) to distinguish legal cannabis from illicit cannabis?	
Secretariat	Packaging & Labelling	Product Marking	6	n/a	If there is a marking scheme what will be the smallest amount marked? – For tobacco the smallest amount stamped is 20 grams but tobacco is being sold in BC in packages as small as 3 grams which are not marked, creating enforcement issues.	

Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
Secretariat	Products/ Product Standards	Packaging and Labelling	6	n/a	Page 50: will there be any fines for inappropriate packaging? What are the consequences?	
AGRI	Packaging & Labelling		6	n/a	To what extent will producers be able to use packaging to create differentiation among “brands”? Further information is required on how strict the limits on design elements would be.	
AGRI	Packaging & Labelling		6	n/a	Will considerations be made for additional labelling requirements for exported product?	
AGRI	Packaging & Labelling		6	n/a	How will the Food and Drug Act and the Cannabis Act work together for packaging and labelling?	
Secretariat	Packaging & Labelling		6.2	n/a	Section 6.2 says that the maximum packaged amount for cannabis oil is 2.1 litres. Going by the 5.2.2 prescribed limit of 30mg/mL, then, a 2.1 litre bottle of oil would contain 63 grams of pure THC. Assuming an average cannabis THC potency of 10%, that would mean the 2.1 litre bottle would contain the equivalent of 630 grams of dried cannabis.	
AGRI	Packaging & Labelling	Packaging	6.2	n/a	Packaging and labelling requirements should consider personal possession limits. What if Cannabis is pre-packaged in 30 gram amounts and an individual wants to purchase various forms of cannabis?	
Secretariat	Medical Access	Underage Use	7	n/a	Can an individual under 19 be a registered person to grow their own cannabis under the Medical Access Regulation?	
Secretariat	Medical Access	Underage Use	7	n/a	Can an individual under 19 be a designated person to grow for another under the Medical Access Regulation?	
AGRI	Medical Access		7	n/a	Will designated producer licences continue to be issued? Will assist in informing the policy question regarding land use planning on the ALR.	
HLTH	Medical Access		7.1	n/a	How will the federal government prevent incentivizing people to become patients to take advantage medical cannabis rules such as production or possession of large amounts of cannabis?	

Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
					<p>What information related to non-medical cannabis licences does the federal government intend to share with provincial and territorial governments?</p> <p>The federal government has claimed jurisdiction over production for both medical and non-medical cannabis and has relegated jurisdiction of distribution and retail of non-medical cannabis to the provinces while retaining jurisdiction over the distribution and sale of medical cannabis.</p> <p>At the same time the federal government is allowing for operators to hold production licences for both medical and non-medical cannabis. As well, will allow vertical integration of licences (i.e. a producer can hold and processing licence and conduct both operations in the same location).</p> <p>s.13</p>	
AGRI	Medical Access	Information Sharing	7.6	n/a		
Secretariat	Products/ Product Standards	Product Types	8	n/a	When will the sale of cannabis-related health and cosmetic products (e.g. prescription and non-prescription drugs, veterinary drugs, cosmetics, medical devices for consuming cannabis) be permitted? In July 2018 or later?	
Secretariat	Miscellaneous		9	n/a	Page 66: federal regulations will establish qualifications for analysts who are involved in the administration and enforcement of the federal Act. Should we align BC's qualifications for analysts (for provincial control and retail provisions) with those of the federal government's?	

Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority?
Secretariat	Licences/ Authorizations		n/a	n/a	If a province's distribution and retail system would authorize a licensed producer to distribute cannabis or make retail sales, will there be any federal regulations which would prohibit or restrict a federally licensed producer from carrying out the provincially authorized activities?	
LDB	Licences/ Authorizations		n/a	1	On page 2, there's a line on federal and provincial/territorial governments shared responsibility for the oversight and licensing of the cannabis supply chain. At which stage do P/T's get involved? What is this level of responsibility?	
Secretariat	Licences/ Authorizations		n/a	n/a	The Bill C-45 definition of distribute includes "administering" in addition to giving, transferring etc. What did the federal government intend to capture in "administering"?	
Secretariat	Miscellaneous		n/a	n/a	Testimony before the Standing Committee on Health indicated that an individual can only have 1 residence at a time and it the place where they live "the majority of the time" – does the federal government have any interpretation materials, policy or procedures to determine where a person lives "the majority of the time"? Are there any deeming rules?	
MCFD	Products/ Product Standards	Storage	n/a	10	Are considerations being given to providing education and tools to support the safe and secure storage of cannabis (both medical and non-medical) products in private residences (particularly where children and youth reside?). For example, will specific lock boxes be made available for individuals who purchase cannabis products?	
Secretariat	Products/ Product Standards	Product Disposal	n/a	n/a	For the purposes of section 105 of the Act – in what circumstances will the storage or handling of cannabis pose a risk to health or safety so that the cannabis may be disposed of in accordance with the regulations or in the manner the Minister directs?	
Secretariat	Products/ Product Standards	Product Disposal	n/a	n/a	What are the regulations for the disposal of cannabis under section 105?	
LDB	Supply		n/a	12	Are there provisions to address potential supply shortages? Will federal regulations ensure fair access to supply for each P/T?	





Request for knowledgeable person time.

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Page 1044 of 1060

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s.16; s.13

# LEGALIZATION & REGULATION OF CANNABIS

## Stakeholder & Public Engagement Plan

### GOAL & OBJECTIVES

The goal of the Stakeholder and Public Engagement Plan is to consult and engage with key stakeholders and members of the public to inform the development of a provincial legal and regulatory framework for non-medical cannabis, while taking a proactive educational approach that seeks to identify and appropriately address interests and concerns from engagement participants. To achieve this goal, the following objectives have been identified:

- › Identify key stakeholder groups for the provincial government to engage with;
- › Identify areas within the provincial legal and regulatory framework that would benefit from stakeholder engagement and develop engagement topics and questions accordingly;
- › Develop and prioritize engagement activities based on stakeholder groups and topics; and
- › Develop key messaging for stakeholders outlining the engagement objectives, scope, plan, and follow-up activities.

The Stakeholder and Public Engagement Plan will be conducted in collaboration with the Government Communication and Public Engagement (GCPE), the Inter-ministry Working Group, and other ministries, as required. The current federal timeline of July 2018 for the legalization of non-medical cannabis may place some constraints on the scope and extent of the stakeholder engagement process. As a result, this plan outlines options for engagement, which can be tailored to meet existing timelines.

### CONTEXT

The Stakeholder and Public Engagement Plan has been informed by the following engagement activities that have taken place at both federal and provincial level:

#### Task Force on Cannabis Legalization and Regulation

The federal Task Force on Cannabis Legalization and Regulation engaged with a large number of organizations and agencies, including: provincial, territorial and municipal governments; experts; patients; advocates; Indigenous governments and representative organizations; employers; and industry. The Task Force also engaged with the public through an online public consultation that generated nearly 30,000 submissions from individuals and organizations

#### Government of Canada

The Government of Canada conducts a number of surveys that seek to collect data related to the health and wellness of Canadians and may be utilized to establish a baseline to monitor the impact of cannabis use within the new framework. Results from the biennial Canadian Tobacco,

s.13

Alcohol and Drugs Survey (CTADS) are used to understand Canadian trends in tobacco, alcohol, and drug use for the effective development, implementation, and evaluation of national and provincial strategies, policies, and programs. In addition, the Communications and Public Affairs Directorate of Health Canada has conducted a baseline survey and exploratory groups on non-medical use of cannabis and provides framework for ongoing monitoring and evaluation.

### Government of British Columbia (BC)

A BC-specific, cannabis-focussed public engagement activity was conducted by IPSOS Public Affairs on behalf of the Province which included a survey and focus groups. One thousand adult (18+ years) British Columbians were interviewed online between August and September 8, 2016. Four focus groups, including two groups in Surrey and two groups in Kamloops, were also conducted in August 2016 and consisted of 37 adult British Columbians with a varying range of support for the legalization of cannabis. The survey focused on questions pertaining to public approval of cannabis legalization, level of government and control desired, timing of public education (see public engagement section for an overview of survey findings).

Generally speaking, BC based stakeholder engagement has been limited due to the timing of the federal bill and the provincial general election. A number of organizations such as the Union of BC Municipalities, cannabis industry associations, and businesses interested in participating in the cannabis industry have reached out to the provincial government and inquired about various aspects of the provincial regulatory framework.

## ENGAGEMENT PLAN

The Stakeholder and Public Engagement Plan consists of three categories of simultaneous engagement on the provincial legal and regulatory framework for cannabis:

1. Mandatory Consultation on Legislation
2. Stakeholder Engagement
3. Public Engagement

### 1. Mandatory Consultation on Legislation

The legalization and regulation of cannabis will require a number of amendments to various acts and/or regulations, and may also require the creation of new legislation. A preliminary scan has determined that at least acts and/or regulations could be potentially impacted by the legalization of non-medical cannabis. As a result, key government stakeholders and partners will be consulted on draft legislation, adhering to the mandated legislative consultation process and confidentiality protocols.

Mandatory consultation will be required with a number of organizations, such as local governments for any proposed amendments to the *Community Charter* and/or the *Local Government Act*. Mandatory consultation with Indigenous groups and other key stakeholders

will be identified and prioritized once legislative impacts have been assessed. Consultations will be tailored to proposed legislative amendments, led by Ministries' legislative teams, and executed in partnership with the Cannabis Legalization and Regulation Secretariat.

## 2. Stakeholder Engagement

To ensure an effective provincial regulatory framework for legal cannabis, a robust and targeted stakeholder engagement is proposed. The purpose of stakeholder engagement is to gather information and feedback from groups and organizations – outside of the provincial government – on specific topics related to the provincial regulatory framework.

Stakeholder engagement will be conducted in the form of roundtable discussions designed to obtain input from identified stakeholders on a set of specific topic areas tailored to their areas of interest and expertise. In addition, an Advisory Panel comprised of key stakeholders could also be set up to help guide and inform the development of the regulatory framework. The Advisory Panel would be comprised of representatives from a selection of stakeholder groups as outlined in the next section.

Ministries and government statutory agencies (e.g., WorkSafeBC), while not captured as part of this Stakeholder and Public Engagement Plan, will be engaged through direct involvement on the project (i.e., Inter-ministry Working Group) or through focused outreach by the Cannabis Legalization and Regulation Secretariat.

### STAKEHOLDER GROUPS

The attached stakeholder register provides a list of all stakeholder groups identified for the purpose of this engagement plan (see appendix). Stakeholders have been organized into the following two categories:

- A. Government Partners
- B. Additional Stakeholder Groups

#### A. Government Partners

Government partners consist of key stakeholders whose level of impact on and support of the framework is deemed necessary to the successful development of the provincial regulatory framework. Engagement will leverage the use of existing forums such as standing committees, association meetings, and annual conventions to not only expedite the process, but to ensure consistent communication through formalized channels.

##### Local Governments

The Province of British Columbia will engage with local governments through the Union of BC Municipalities (UBCM). A session will be held at the upcoming UBCM Convention

(September 25 to 29, 2017). This will provide an opportunity for the province to elicit local governments' input on specific topics of interest. Input will also be sought on the preferred way to engage with local governments following the UBCM Convention. MCSCD: please provide additional information as you see fit.

### Indigenous Governments and Organizations

The BC Cabinet and First Nations Leaders Gathering on September 7-8, 2017 will provide a forum to engage with BC First Nations organizations.

MARR: please provide additional information as you see fit.

### Law Enforcement

Engagement with police will be conducted through the BC Association of Chiefs of Police (BCACP) and the BC Association of Municipal Chiefs of Police (BCAMCP). A presentation on cannabis legalization and regulation followed by discussions could be tabled at one of BCACP and BCAMCP regular meetings. Discussion will focus on topics of interest to police, as well as identify the preferred method for ongoing engagement (e.g., one of BCACP's standing committees).

RoadSafety BC: Should ICBC be placed in this category? If yes, are there any existing standing committees that could be used as an engagement vehicle (such as the BCACP Traffic Safety sub-committee)?

### Health partners

MOH: Which health partners would we want to engage with (e.g., Health Authorities) under this category and are there any existing forums/committees that could be used as an engagement vehicle?

### Ministry of Agriculture

AGRI: Are there Ministry of Agriculture key partners under this section that we would engage with? If yes, any existing forums/committees we could leverage?  
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**Liquor Distribution Branch (LDB) and Liquor Control and Licensing Branch (LCLB)**

LDB and LCLB: Are there key partners under this section that we would engage with? If yes, any existing forums/committees we could leverage?

**B. Additional Stakeholder Groups**

Additional stakeholder groups consist of organizations and agencies that have a stake in the legalization of cannabis, but unlike government partners, may not have established relationships with the Province of British Columbia. Engagement with additional stakeholder groups will elicit feedback on specific aspects of the provincial regulatory framework that are tailored to their areas of interest. These groups have been broken down into the following three categories:

**1. Existing Cannabis Industry Participants**

These organizations are currently involved within the cannabis industry in various capacities, such as licensed commercial producers of medical cannabis, dispensaries, compassion clubs, or associations representing the interests of cannabis industry, such as the BC Cannabis Trade Alliance. s.13;s.16

s.13;s.16

**2. Interested Cannabis Industry Participants**

These organizations are interested in entering the cannabis industry, either as distributors, retailers, or by offering new business services. Some of these organizations have previously approached the provincial government for consideration in the development of the provincial regulatory framework (e.g., Responsible Marijuana Retail Alliance of BC and the Canadian Association for Pharmacy Distribution Management). Engaging with these organizations will provide the provincial government an

opportunity to hear proposals and gather information on specific aspects of the regulatory framework. It will also provide a forum for these organizations to advocate for their involvement in the cannabis industry, and ask questions about the framework under development.

### 3. Organizations Affected by Cannabis Legalization

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These organizations have expressed concerns about potential harms resulting from the legalization of cannabis in their specific area (e.g., British Columbia Real Estate Association, MADD, etc.). Engagement will focus on hearing their concerns and identifying possible solutions to help inform the development of the provincial regulatory framework.

## ENGAGEMENT TOPICS

Engagement activities will be designed to engage stakeholders for the purpose of identifying questions and issues, defining priorities, and suggesting solutions for the regulatory framework. Discussion topics will focus on various aspects of the provincial regulatory framework, with questions tailored to draw on the expertise and knowledge of stakeholders. Areas of the regulatory framework that fall under the federal government's responsibility (e.g., regulations on production, testing, labelling and packaging of cannabis) will not be the focus of the sessions, unless where there is a direct provincial impact (e.g., cannabis regulation in agricultural land reserve).

Input will be elicited on the following topics:

- › Age of purchase
- › Public consumption, including advertising and promotion restrictions
- › Drug impaired driving
- › Distribution
- › Retail
- › Production issues as they relate to the provincial government
- › Personal production
- › Personal possession limits for adults and youth
- › Workplace considerations
- › Housing considerations
- › Public awareness and education

Direction received from the provincial government on key elements of the regulatory framework, such as distribution and retail models, will help inform the engagement questions.

### 3. Public Engagement

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## CONTEXT

**Confidential Draft** – For Discussion Purposes Only

Page 6 of 12



Last September 2016 IPSOS Public Affairs conducted a survey on behalf of the Province regarding cannabis policy within British Columbia. The survey resulted in the following findings:

- › The majority of respondents approve of cannabis legalization
- › Most want strong government regulation and control
- › Most want public education before and after legalization
- › There is little consensus about who should be producing cannabis, whether grown at home for personal use, grown by large industrial growers or grown by small scale growers.
- › Not all products are viewed equally and opinions were much more divided when it came to products such as edibles, concentrates and tinctures
- › Pharmacies and specialty stores (i.e., dispensaries) are most supported retailers with a slight majority (54%) approving of allowing marijuana to be sold in liquor stores (government or private). There was less approval for allowing marijuana to be sold out of private homes, at farmers markets, sold like tobacco (e.g., convenience stores, food stores) or through delivery by mail, ordered by phone or internet.
- › Most want government run stores and limitations on retailers such as store location (e.g., proximity to schools), number of stores in a neighbourhood, hours of operations, and store signage and appearance from the exterior.
- › No consensus on minimum age for purchase and consumption although 19 years is the median minimum age preferred.

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Public surveys and focus groups on cannabis use are also conducted in British Columbia, including the McCreary Centre Society's BC Adolescent Health Survey and the British Columbia Centre on Substance Use survey into dispensaries' users. The McCreary Centre Society conducts the BC Adolescent Health Survey every five years gathers information regarding the physical and emotional health of youth within British Columbia, including the amount of alcohol and drug use amongst youth, as well as the prevalence operating motor vehicles after consuming alcohol and drugs. Additionally, the McCreary Centre Society released a report entitled *Blunt Talk*, which describes cannabis use amongst British Columbia youth and identifies negative health consequences, while providing a baseline description prior to the legalization of non-medical cannabis.

The British Columbia Centre on Substance Use, in partnership with the British Columbia Centre for Excellence in HIV/AIDS, is conducting an online study to understand the reasons Canadians use cannabis by asking those who have purchased cannabis from dispensaries in Vancouver. The study is hoping to find out which ailments people tend to use cannabis for, such as anxiety, depression, or chemotherapy side-effects, as well as the benefit of people using cannabis instead of other medications. Preliminary results are expected in August 2017.

## PUBLIC ENGAGEMENT STRATEGIES

Seeking feedback from British Columbians on specific aspects of the provincial cannabis regulatory framework will provide them an opportunity to voice their opinion and present them

with an open and transparent view of how the provincial framework is developed. Engagement can also be used as a way to educate the public about the upcoming legalization of cannabis and the specific aspects of the regulatory regime, such as cannabis use amongst children and youth, cannabis impaired driving, and other important topics.

The following public engagement strategies could be conducted concurrently, permitting the time constraints imposed by the July 2018 legalization timeline are considered. Alternatively one or more of the following strategies could be selected as the main approach to public engagement.

## 1. Online Engagement

govTogetherBC (<http://engage.gov.bc.ca/govtogetherbc/>) will be used as the online channel to invite feedback from the public on aspects of the cannabis legalization and regulation framework. govTogetherBC is the hub for government engagement opportunities in British Columbia. This site offers a platform where the public can read about the results of the Province's engagements, find out information about upcoming changes, or browse through open projects to explore opportunities to contribute feedback on topical issues. govTogetherBC supports the government in its objective to become transparent and accessible.

### A. Blog Content Development Strategy

The primary blog content will be two-week long "conversations", centred on a particular key question that is opened for discussion, moderated by govTogetherBC, and then closed and reported out to GCPE and the Secretariat. A posting schedule will be developed to inform the public when there is new content added for feedback. Where appropriate, a 3-5 sentence introduction will be included to provide a narrative, followed by the specific question. Where ever possible, the post will also include a link to relevant background information that is available online.

Questions will be developed in collaboration with GCPE and the Secretariat, and may also be derived from other forums, such as stakeholder engagement meetings. The blog will also be punctuated by strategic posts that will respond to high profile issues or developments. GCPE will provide advice on content opportunities, such as ties to other government announcements or initiatives. GCPE will also ensure other stakeholder ministries are made aware of emerging issues that fall outside the scope of this project. The govTogetherBC moderator will analyze public comments posted within the blog and identify themes, suggestions, and ideas which will then be summarized and posted back on the website for public access.

### B. Social Media Strategy

British Columbians will be encouraged to participate in the online consultation through social media networks such as Facebook and Twitter. The social media strategy will

leverage stakeholder networks and web-presence to centralize government's conversation on the interactive web site. By directing British Columbians to participate in the blog, public opinion will be monitored and feedback moderated.

Stakeholders will also be asked to support engagement by encouraging those in their networks to engage directly on the site. Cross-government Twitter and Facebook page administrators can also encourage public participation by re-tweeting public questions or posts that are relevant to cannabis legalization and regulation, as well as any additional posts from government and/or stakeholders that address the initial question. A twitter account could be created with a relevant hashtag to be incorporated into messaging so that government can nurture and monitor related feedback on Twitter.

### C. Twitter Town Halls

Twitter Town Halls can also be organized as an additional online public engagement tool to converse about specific topics and issues. Twitter Town Halls are easier and more cost effective to organize than physical Town Hall meetings, and have the ability to reach out to the public across the province regardless of where they live thereby avoiding physical access issues. Twitter Town Halls would be moderated by a govTogetherBC expert moderator with a set of questions identified in advance.

## 2. Survey

An online survey similar to the September 2016 IPSOS could be conducted. An online survey is being proposed as this method is more cost effective and faster than a typical telephone survey. If conducted in the same manner as the 2016 IPSOS survey, the survey would have a sample size of 1,000 respondents, proportional to BC's population, with a robust regional break consisting of:

- › 500 interviews in Metro Vancouver (150 in Vancouver, 200 in South Fraser and 150 in Metro Vancouver)
- › 200 interviews on Vancouver Island
- › 200 interviews in Southern Interior
- › 100 interviews in the North

The online questionnaire would be 15 minutes in length, based on the number of questions asked. IPSOS would develop the questionnaire and informed by topics provided by the Secretariat, survey programming, survey fielding, tables' coding, and reporting. The proposed survey could be conducted within a month.

Estimated budget for the online survey: approximately \$30,000.

The survey could be reduced or expanded by adding questions and/or number of interviews, which would have an impact on the estimated budget.

### 3. Focus Groups

Focus groups could be used as an additional tool to gather feedback from the public on aspects of the regulatory framework. Questions asked online and/or through the survey could be the subject of a more focussed, detailed and inter-active conversations within small groups of people. This forum would encourage group participants to share their perspectives with other participants and could provide useful insight into aspects of the framework.

Discussions would be facilitated by a professional moderator. Groups would consist of a maximum of 8 to 12 people, with a cross representation from the BC population including various age groups, income brackets, cannabis users versus non-cannabis users, etc. Sessions would run from 1.5 to 2 hours in length. Participants would be compensated for their time (\$75 each). Focus groups would be conducted across the province broken down as follows:

- › Two focus groups in Metro Vancouver outside the downtown core
- › Two focus groups in the Southern Interior
- › Two focus groups in the North
- › Two focus groups on Vancouver Island

Estimated budget: \$45,000 (including moderator's fee and participants' incentives).

The number of focus groups could be reduced or increased which would have an impact on the estimated budget.

Sample questions for public engagement would focus on the following topics:

- › **Age of purchase:** What age should the government set as a minimum age for consumption and purchase of cannabis? 18, 19, 21 or over 21?
- › **Public consumption:** Where should government allow consumption of smoked cannabis products? Should smoking of cannabis be restricted like smoking of tobacco? Where should government allow consumption of non-smoked cannabis products?
- › **Advertising and promotion restrictions:** What kind of advertising and promotion restrictions should be used for cannabis?
- › **Drug impaired driving:** Questions related to penalties for cannabis impaired driving
- › **Distribution:** Questions related to distribution if deemed appropriate
- › **Retail:** What restrictions should be placed on storefronts (e.g., hours of operation, store location, store signage and appearance from exterior, size of stores, etc)?
- › **Personal production:** Should government regulate the personal production limit of 4 plants?

**Comment [MSBJ9]:** I have fleshed out this section

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Other topics for consideration could include workplace considerations, housing considerations and public awareness and education.

## STAKEHOLDER & PUBLIC ENGAGEMENT TIMELINE

DATE	ACTION	OUTCOME	LEAD PARTICIPANT
<b>Consultation on Legislation</b>			
Ongoing as legislation is developed	Mandatory stakeholder consultation	Fulfilling legislated requirement of mandatory consultation; Opinion to inform the provincial regulatory framework; Briefing, Information, and Decision Notes	Legislative Unit and impacted Ministries' legal teams
<b>Stakeholder Engagement</b>			
June 1, 2017 – July 31, 2017	Identify and prioritize stakeholder groups and organizations; Determine appropriate forum for each engagement session	Schedule of proposed engagement sessions with stakeholder groups; Established participant list for roundtable discussions	Cannabis Legalization and Regulation Secretariat Inter-ministry Working Group
August 1, 2017 – August 31, 2017	Develop clear and measurable questions that will obtain desired information from engagement sessions	Stakeholder engagement questions document	Cannabis Legalization and Regulation Secretariat Inter-ministry Working Group
September 2017 – January 2018	Stakeholder consultation and engagement – dates and stakeholder groups to be determined	Information to inform the provincial regulatory framework; Briefing, Information, and Decision Notes	Cannabis Legalization and Regulation Secretariat Inter-ministry Working Group and other impacted Ministries as required
<b>Public Engagement</b>			
May 31, 2017 – June 30, 2017	Identify information and format required to inform provincial	Create a public engagement document outlining key	Cannabis Legalization and Regulation Secretariat & GCPE

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DATE	ACTION	OUTCOME	LEAD PARTICIPANT
	regulatory framework through public engagement sessions	information the Province would like to gather regarding the regulatory framework and engagement methods (online, survey, etc.)	
July 1, 2017 – August 31, 2017	Develop clear and measurable questions that will obtain desired information	Key questions document	Cannabis Legalization and Regulation Secretariat & GCPE
September 2017 – January 2018	Public consultation and engagement – dates and forums to be determined	Information to inform the provincial regulatory framework; Briefing, Information, and Decision Notes	GCPE

**Status Quo Option with implications**

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# Cannabis Briefing – February 20, 2018

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Prepared by s.15;s.19

## Key Facts & Considerations

- Currently, medical cannabis production with a federal license is a designated farm use on the ALR (s. 2(2)(p) ALRUSPR). As such, local and treaty First Nations governments cannot prohibit it on ALR land within their respective jurisdictions.
- The Federal government has indicated that it will allow indoor and outdoor production for all types of cannabis production ("cultivation") licenses (Health Canada Report: Proposed Approach to The Regulation of Cannabis, Article 2.3.3).
- s.14

## Summary of Legal Opinions Respecting Cannabis

s.14

**From:** s.15;s.19 [AGRI:EX](#)  
**To:** s.15;s.19 [AGRI:EX](#)  
**Cc:** s.15;s.19 [AGRI:EX](#); s.15;s.19 [AGRI:EX](#); s.15;s.19 [AGRI:EX](#)  
**Subject:** ADM cannabis meeting  
**Date:** Tuesday, January 16, 2018 15:01:15  
**Attachments:** 1 2018-01-16 ADM PSIC Agenda.docx

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s.15;s.19  
s.13

s.15;s.19 going to start working on the AGRI slides to be prepared.  
s.15;s.19

Ministry of Agriculture  
s.15;s.19

**From:** s.15;s.19 [GRI:EX](#)  
**To:** [GRI:EX](#)  
**Subject:** AGRI Presentation for s.15;s.1 Cannabis\_jan 25 18 - Final Draft.pptx  
**Date:** Friday, January 26, 2018 09:54:22  
**Attachments:** AGRI Presentation for s.15;s.1 Cannabis\_jan 25 18 - Final Draft.pptx

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Had a quick conversation with s.15; added a few points. How does this look to you?

Thanks!

**From:** s.15;s.19 [\AGRI:EX](#)  
**To:** [\AGRI:EX](#)  
**Cc:** s.15;s.19 [\AGRI:EX](#)  
**Subject:** AGRI Presentation for **S.15;s.1** \_Cannabis\_jan 26 18 - Final Draft.pptx  
**Date:** Friday, January 26, 2018 15:32:28  
**Attachments:** [AGRI Presentation for \*\*s.15;\*\* Cannabis\\_jan 26 18 - Final Draft.pptx](#)

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Policy considerations reduced. Slides now called Key Issues/Consideration to differentiate from Min of Agriculture Policy Questions. Hope this works for you!  
Speaking notes being updated...let us know timing for those!  
THANKS TO **s.15;s.1** !!

**From:** s.15;s.19 :EX  
**To:** s.15;s.19 AGRI:EX s.15;s.19 PSSG:EX;s.15;s.19 AGRI:EX;s.15;s.19 PSSG:EX;  
AGRI:EX AG:EX  
**Subject:** s.12;s.13  
**Date:** Friday, June 8, 2018 15:36:18

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Hi s.15;s.19

s.12;s.13

s.15;s.19

Cannabis Legalization and Regulation Secretariat  
Policing and Security Branch  
Ministry of Public Safety and Solicitor General

s.12;s.13

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**From:** s.15;s.19 | ALC:EX  
**To:** - AGRI:EX  
**Subject:** Approach to limiting structures in the ALR  
**Date:** Thursday, March 8, 2018 15:52:02

---

H/s.15;s.19

Just to re-iterate, to approach the greenhouse/cannabis regulation problem, I suggest a regulation  
**s.13**

Greenhouses should be defined as a structure whose entire walls and ceiling are constructed of glass.

Regards

s.15;s.19

**Agricultural Land Commission**  
s.15;s.19

*Our address is changing as of April 3, 2018 – we are moving upstairs to #201, 4940 Canada Way  
Burnaby, V5G 4K6*

s.15;s.19



**From:** s.15;s.19 PSSG:EX  
**To:** s.15;s.19 L PREM:EX;s.15;s.19 FIN:EX:s.15;s.19 IRR:EX:s.15;s.19 AGR:EX:s.15;s.19  
s.15;s.19 EX;s.15;s.19 JAG:EX:s.15;s.19 M MAH:EX:s.15;s.19 P HLTH:EX;s.15;s.19  
PSSG:EX;s.15;s.19 PSSG:EX;s.15;s.19 PSSG:EX;s.15;s.19 PSSG:EX  
**Cc:** s.15;s.19 PSSG:EX  
**Subject:** Bilateral meeting between BC and the Gov of Canada - Fri, Dec 15th @ 9:00am  
**Date:** Wednesday, December 13, 2017 16:20:47  
**Attachments:** [EDMS-#669798-v1-BC Bilat Agenda.doc](#)  
[EDMS-#665149-v1-Overview Deck.pdf](#)  
[Health Canada Consultation Discussion Paper.pdf](#)  
[EDMS-#665170-v1-Production Info Graphic.pdf](#)  
[EDMS-#665177-v1-Info Graphic B.PDF](#)  
[Questions re Federal Proposed Regulations Dec 13 2017.docx](#)  
[Comments re Federal Proposed Regulations Dec 13 2017.docx](#)

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Good Afternoon,  
Please find attached the agenda and materials for the Bilateral meeting between BC and the Government of Canada on Friday, December 15<sup>th</sup> at 9:00am.  
Kind Regards,  
s.15;s.19

Cannabis Legalization and Regulation Secretariat  
s.15;s.19  
Policing and Security Branch  
Ministry of Public Safety and Solicitor General  
s.15;s.19

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**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Cannabis AGRI Legislation Impacts UPDATE  
**Date:** Wednesday, March 8, 2017 14:36:31  
**Attachments:** S.13

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His.15;s.19  
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s.15;s.19

Corporate Governance, Policy & Legislation Branch  
Ministry of Agriculture  
s.15;s.19

**From:** ~~s 15's 19~~ AGRI:EX  
**To:** ~~s 15's 19~~ AGRI:EX  
**Cc:** ~~s 15's 19~~ AGRI:EX; ~~s 15's 19~~ AGRI:EX; ~~s 15's 19~~ AGRI:EX  
**Subject:** cannabis consumption  
**Date:** Wednesday, March 21, 2018 11:21:23

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I did some rough figuring on the estimated consumption and production capability of cannabis in Canada.

The last federal deck gave a high end projection for demand of 800,000kg. That equates to approximately one ounce per year consumed for every person between the ages of 19 and 75. That seems like a lot of pot given the very high percentage of non-users and occasional users. This seems like a logical reasonableness test on the Federal estimate on consumption. I don't believe the consumption estimate of 800,000 kg is too low.

800,000 kg equates to \$7 billion @ the \$9/gram price point so the federal estimate of \$5 billion in 2017 is using a lower price point.

A previous federal deck that went to deputy ministers stated the required production area to meet demand is 8 million square feet. This equates to 100 grams ( less than 4 ounces) of production per square foot to get to the 800,000 kg to meet demand. This is at the high end of available production reports but within reason.

The latest federal deck estimates current and expected production sites to be able to produce 1.5 million kilograms. This means they are estimating 15 million square feet (344 acres) of production space. I believe this estimate to be low.

Anecdotal reports in BC from the vegetable greenhouse sector alone project a shift in production space of at least 100 acres. This number could actually be closer to 200 acres as more producers investigate the possibilities. This does not include production from existing and expanding medical marijuana producers or the numerous companies announcing new production facilities.

BC producers either have in place or have announced plans for production facilities capable of meeting most of the national demand.

From a policy perspective

- The required acres (344 nationally) is miniscule and does not present any significant threat to food security. This is especially true when you consider that much of the production will be done on land currently not used for agriculture and some of the shift in greenhouse use could come from ornamental plant producers or floriculture.
- The expectation that production will quickly outstrip demand seems reasonable. There does not seem to be a need to make any special provision or compromise other public policy objectives to facilitate cannabis production.

**From:** s.15;s.19 [GRI:EX](#)  
**To:** s.15;s.19 [AGRI:EX](#)  
**Cc:** s.15;s.19 [\GRI:EX](#)s.15;s.19 [\GRI:EX](#);s.15;s.19 [AGRI:EX](#)  
**Subject:** s.12;s.13  
**Date:** Tuesday, June 5, 2018 10:53:31  
**Attachments:** [image001.jpg](#)

---

Hi s.15;s.19

Further to the conversation s.15;s.19 and I just had with you, I write to confirm direction for the s.12;s.13

Please confirm that this is acceptable at your earliest convenience.

Thank you for your guidance and leadership!

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15;s.19



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** Cannabis direction  
**Date:** Friday, December 22, 2017 13:58:40

---

s.15;s.19

s.12;s.13

s.15;s. anything to add?

s.15;s.19

Ministry of Agriculture

s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Cannabis Fact Sheet (internal)  
**Date:** Tuesday, February 13, 2018 09:09:34  
**Attachments:** 2018 FS Cannabis.docx

---

H;s.15;s.19

As we discussed previously, I was asked to prepare a fact sheet on cannabis. The industry specialists produce annual fact sheets for each of their sectors. They provide an overview of the sector for executive...and are only for internal use.

I have completed the first draft of the cannabis fact sheet. Would you have time to take a look at it? The fact sheets are to be kept to no more than 3 pages, thus it is difficult to include too much detail. Thanks.

s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 GRI:EX  
**Subject:** Cannabis Growers of Canada report for the Standing Committee on Health  
**Date:** Wednesday, December 6, 2017 15:59:32

---

His.15;s.19

I was looking at the "what we heard" document for BC and noticed that the written comments are attached to the report. Here is a link to the report submitted by Cannabis Growers of Canada:  
<http://engage.gov.bc.ca/app/uploads/sites/217/2017/11/Cannabis-Growers-of-Canada.pdf> It gives you a bit more information on their views of cannabis regulation in BC and may be useful for your meeting on the 15<sup>th</sup>.

Regards,

s.15;s.19



Page 016 of 381

Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 PSSG:EX  
**To:** s.15;s.19

**Subject:** Cannabis Legalization - Discussion Paper for your review  
**Date:** Friday, September 8, 2017 12:29:37  
**Attachments:** Discussion Paper - V.04.docx  
**Importance:** High

---

Dear Working Group members:

As discussed at the last Inter-Ministry Working Group meeting, I have attached a draft copy of the discussion paper that will be distributed to local governments, indigenous governments and organizations and stakeholder groups as part of the stakeholder engagement. This is the penultimate draft, inclusive of feedback from Legal Services and GCPE. This document is intended to be in plain language. I would like to ask you to focus your edits and comments on anything that you think may be missing or inaccurate. Could you please provide your comments by **1 pm on Monday, September 11<sup>th</sup>**?

Thank you for your prompt review and feedback. Please let me know if you have any questions.

Kind regards.  
s.15;s.19

Cannabis Legalization and Regulation Secretariat  
Policing and Security Branch  
Ministry of Public Safety and Solicitor General  
s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 GRI:EX;s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 GRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** Cannabis production and Greenhouses in the ALR  
**Date:** Thursday, March 22, 2018 12:04:14

---

Hi s.15;s.19

The Minister's Advisory Committee just met with UBCM Executive and cannabis and greenhouses came up as well as their contributions to the cannabis secretariat's JCCR. AGRI needs an immediate policy discussion with MAH and ALC.

s.15;s.19 ) set up a multi-group mtg on this a few weeks back and it was cancelled s.13 Can you please set up, for early next week, a meeting with you, me, s.15;s.19 (ALC) s.15;s.19 (MAH) and your key cannabis secretariat contact at MAH (I forgot her name!), the MAH director of planning (I forgot her name!), s.15;s.1 and her team (planners, she can confirm who), and s.15;s.19 Is there anyone else at AGRI we should include?

I can help with the agenda on Mon. To hold the meeting time, please note this is a policy discussion on LG issues and tools respecting cannabis production in the ALR. We need to better understand the range of concerns, issues and options as soon as possible and across the three agencies s.15;s. can help with a room. Thank you so much.

s.15;s.19 19

Sent from my iPhone

On Mar 22, 2018, at 9:32 AM, s.15;s.19 GRI:EX s.15;s.19 <[s.15;s.19@gov.bc.ca](mailto:s.15;s.19@gov.bc.ca)> wrote:

s.15;s.19 I would also strongly recommend a reach out to MAH. I think the options for the cannabis should be shared with them as well as they will impact LG's if they have not already. We should be seeking their feedback as we develop options so that when the info goes forward, we know that MAH will be supportive.

Thanks

s.15;s.19

Ministry of Agriculture

s.15;s.19

---

**From:** s.15;s.19 GRI:EX  
**Sent:** Wednesday, March 21, 2018 4:51 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 GRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 GRI:EX  
**Subject:** Designation of Greenhouses on ALR\_DRAFT  
s.15;s.19 I've reviewed s.15;s.19 note which had support from s.15;s.19  
It's a great note. A question for you: s.12;s.13  
s.12;s.13  
Thanks – great work, s.15;s.1

**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** Cannabis production policy  
**Date:** Wednesday, February 21, 2018 08:34:31

---

Hs.15;s.1 I've been thinking about this, wondering if you think we're missing a policy working group on cannabis productions.12;s.13

s.12;s.13 after the temperature check. I'm thinking a WG comprised of AGRI staff (some of your current internal group), plus UBCM reps, MAH, ALC staff, etc. This would be run by you (with help from other policy staff and others as needed) for the purpose of informing the development of provincial policy on production including potential leg/reg changes. It would also identify the key people to lead the development of the operational policy once the over-arching policy is set. What do you think? I think we need to bring some immediate WG attention to this issue so the recommendations we make to the province are solid and based on the real issues/challenges that could arise for those that will be involved in regulation in some way.

Let me know what you think. Hope you have a good day :)

s.15;s.19

Sent from my iPhone

**From:** s.15;s.19 [AGRI:EX](#)  
**To:** s.15;s.19 [AGRI:EX](#) s.15;s.19 [AGRI:EX](#) s.15;s.19 [AGRI:EX](#) s.15;s.19 [AGRI:EX](#)  
**Subject:** Cannabis  
**Date:** Thursday, May 10, 2018 17:54:08

---

s.13

Thanks so much for everyone's work on this. A+

Sent from my iPhone



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Defining soil based production\_meeting Minutes May 16 2018\_s.15;s.19  
**Date:** Friday, May 18, 2018 11:12:26  
**Attachments:** Defining soil based production\_meeting Minutes May 16 2018\_s.15;s.19

---

Hi s.15;s.19. Please find my comments on the discussion from Wednesday's call.  
s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** GRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** s.12;s.13  
**Date:** Wednesday, March 21, 2018 16:51:20  
**Attachments:** s.12;s.13

---

Hi s.15;s.19. I've reviewed s.15;s.1 note which had support from s.15;s.19  
note. s.13 It's a great  
for the Minister's information? be appended  
Thanks – great work, s.15;s.19  
s.15;s.19



**From:** s.15;s.19 PSSG:EX  
**To:** \GRI:EX  
**Cc:** s.15;s.19 PSSG:EX  
**Subject:** s.12;s.13  
**Date:** Monday, April 30, 2018 14:00:29  
**Attachments:** s.12;s.13

---

Hi s.15;s.1  
a

Please note my comments in the attached. I will review the second one shortly.

s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX s.15;s.19 GRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** DRAFT cannabis drafting instructions (3CD)  
**Date:** Wednesday, May 30, 2018 12:06:16  
**Attachments:** image001.jpg  
s.12;s.13  
**Importance:** High

---

Hi team –

Here's my first kick at the drafting instructions can. I'd love to hear your thoughts. I have highlighted in yellow the portion that needs a lot more work -s.12;s.13

s.12;s.13

Please provide feedback by **2pm** if at all possible. I need to send these instructions to the Office of Leg Counsel asap in order to get us into the drafting queue.

Thank you kindly for your thoughts and feedback,

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15;s.19

Agri Logo



**From:** s.15;s.19 PSSG:EX  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Federal regulation questions  
**Date:** Monday, January 22, 2018 11:33:37

---

H<sub>q</sub> s.15;s.1

You may have these answers already, seeing as how you were at the meetings with us in Vancouver. But, for my own confirmation purposes, here are the answers we have so far to the questions you submitted about the proposed federal regulations. If you've managed to answer any others please let me know so I can update my list. We're still working on setting up a meeting with HC to go over these.

Thanks,

s.15;s.

Table 1, page 19: Would 3rd party service providers e.g. transportation company be covered by other's (e.g. the cultivator or processor) license?	s.13;s.16
---	-----------

Needed to inform the provincial policy development on the distribution and retail system.

Will industrial hemp cultivation licence holders be able to hold a micro processing licence (e.g. processing CBD products)?
---

What does the requirement to notify local authorities include? Is granting of a federal licence dependent upon approval from local authorities? (i.e. proposed operation meets all provincial and municipal regulations and bylaws?)
--

Not clear what the policy intention is given there is a lack of information on what the notification includes and is intended to achieve. What is the outcome that is expected?

This information will assist in informing provincial policy on the role of local governments in decisions related to land use and cannabis in municipalities across the province, and whether there will be the ability to prohibit or restrict cannabis operations in BC.

To avoid that producers use the federal legislation to trump provincial legislation, production and processing operators should be in compliance with provincial land use and agricultural regulations.

Is there an expectation that other practice recommendations e.g. waste management will be put in place on national scale or established at provincial/local scale?
--

Since not all parts of the plant are utilized, what
---

requirements would apply to the waste portion of these plants? Would it be burned, composted, baled or used in manufacturing for some other purpose? Can it be integrated into agricultural production systems without a licensing requirement?

s.13;s.16

Will there be a federal program in place to respond to complaints of all types of cultivation, including 'designated producer' sites? What will be the process for concerns expressed by those impacted from production practices (i.e. neighbourhood odour complaints)? What enforcement resources will be provided and how?

Would provincial staff who provide industry support require security clearances in order to enter licensed production and processing facilities e.g. Regional Agrologists?

Clarity on how the province will need to interact with these types of licensed operations requiring security clearance is required and would be very problematic if they are required for Provincial Regional Agrologists to inspect the operations in response to a nuisance complaint.

s.15;s.19

Cannabis Legalization and Regulation Secretariat

Policing and Security Branch - Ministry of Public Safety and Solicitor General

s.15;s.19

**From:** s.15;s.19 [GCPE:EX](#)  
**To:** s.15;s.19 [AGRI:EX](#)  
**Cc:** s.15;s.19 [AGRI:EX](#); s.15;s.19 [GCPE:EX](#); s.15;s.19 [AGRI:EX](#)  
**Subject:** FINAL IB-Cannabis Regs tomorrow at 9 AM-need confirmation that OIC will be published  
**Date:** Thursday, July 12, 2018 11:02:28  
**Attachments:** [2018AGRI0050-001390.pdf](#)  
**Importance:** High

---

Hi there, attached is the final IB for tomorrow on the cannabis on ALR regulatory change.  
Can you please confirm that the OIC will be deposited by then? I don't want the release out without the OIC published.  
The time we currently have for release is 9 AM.

Thanks!  
s.15;s.19

s.15;s.19

Ministry of Agriculture  
Government Communications and Public Engagement  
s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** Follow up: RE: Intensive Indoor Agriculture  
**Date:** Monday, November 20, 2017 15:33:00

---

Hi s.15;s.

A few initial bullets for your consideration:

- Here's the Strengthening Farming Program [webpage](#) on OCP Development Permit Areas for the protection of farming. There's a linked example from Nanaimo as well. *Local Government Act* section 491(6) states that they may be applied to "provide for the buffering or separation of development from farming on adjoining or reasonably adjacent land." I would anticipate (and encourage) however that a local government pursuing to adopt such an OCP amendment would do so in a long-term and all-inclusive manner for the benefit of agriculture, rather than a site specific approach.
- I'd also suggest clarifying that Minister's Bylaw Standards are not regulations, they're more like guidelines that the Ministry encourages local governments to employ when they're developing their own bylaws. From *Local Government Act* Section 551.
- I did a search on BCFIRB's website and found their April 2017 Adjournment Decision which references cannabis farm practices and odour which I hadn't read yet. If you haven't seen it, it's located here: [https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/organizational-structure/boards-commissions-tribunals/bc-farm-industry-review-board/farm-practices/complaint-decisions/preliminary-decisions/2017\\_apr\\_20\\_-\\_kaye\\_et\\_al\\_v\\_chang\\_yu\\_xu\\_adjournment\\_decision.pdf](https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/organizational-structure/boards-commissions-tribunals/bc-farm-industry-review-board/farm-practices/complaint-decisions/preliminary-decisions/2017_apr_20_-_kaye_et_al_v_chang_yu_xu_adjournment_decision.pdf)

s.15;s.19

British Columbia Ministry of Agriculture

s.15;s.19

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, November 17, 2017 4:22 PM  
**To:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** Fwd: Intensive Indoor Agriculture  
What I wrote, then learned from s.15;s.1 I'll talk s.15; next week and follow up with you the following week s.15;s. Any ideas or suggestions you have are welcomed.

s.15;s.19

Begin forwarded message:

**From:** s.15;s.19 <[@rdck.bc.ca](mailto:@rdck.bc.ca)>  
**Date:** November 17, 2017 at 5:09:05 PM MST  
**To:** s.15;s.19 AGRI:EX;s.15;s.19 <[@gov.bc.ca](mailto:@gov.bc.ca)>  
**Subject:** Re: Intensive Indoor Agriculture

Thank you for your reply. I have been learning more since I wrote so apologies for being vague.

RDCK Area E doesn't have zoning.

I went through a 6 year process to create an official community plan which was established in 2014. The length of time was due to staff changes and internal re-prioritization and therefore zoning is not established.

The OCP contains Development Permits for industrial and riparian areas but none for ALR. land.

I hope to have staff develop a development permit for set backs and form and character that is acceptable to the ALC. and Ministry of Agriculture.

Directors have been instructed by staff that zoning is the only tool to guide MM facilities however page 16 and 17 of the Bylaw Standard Guide indicates that Development Permits can as well.  
Do you believe that to be correct?

The buildings are 2 and they are 40 by 80 structures which will be enclosed. They were too small to be of concern to the ALC but large enough to have an impact on land and water use.

There is a residence on the property which I am told makes it not eligible for licensing as indicated in the Bylaw Standard page 14.. \*\*\*This is a problem for small lot agriculture that has a primary residence and wants to grow licensed medical or recreational marijuana  
The west Kootenays have many 25 to 50 acre parcels with a house. on them and there are unzoned areas in 6 of the 11 electoral areas in the RDCK.

It is local knowledge that the proponent had a license under MAPR in a different community and perhaps is in the re-registrition process. so ACMPR is not in place. I have not seen the file but RDCK planning staff confirmed there is no current MMPR. license.

We have no guidelines other than industrial building permit with code risk F3 on these buildings, one of which is 50 feet from the neighbours home. Between Right to Farm and no license under MMPR or ACMPR there are few tools. This is an unimpregnable way to set up marijuana production with no rules. to safeguard neighbours.

The current situation leaves the electoral areas without zoning in the position of becoming open to increasing unlicensed facilities again I fear. and with recreational use coming on stream it will only build.

Respectfully I hope the Ministry of Agriculture Solicitor General and ALC can assist Regional Districts in dealing with this phenomena and I will do what I can to make room for both licensed facilities and preserving homes and farms that are potentially affected.

The proponent was planning to use their domestic water license of 250 gallons on a creek that is small and serves 9 or so houses. That was alarming to more than immediate neighbours. The waterusers are following up with that.

Thank you for your time.  
s.15;s.19

Electoral Area E  
Regional District Central Kootenay

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: s.15;s.19 AGRI:EX" s.15;s.19 @gov.bc.ca>  
Date: 2017-11-17 12:38 PM (GMT-08:00)  
To: s.15;s.19 @rdck.bc.ca>  
Subject: Re: Intensive Indoor Agriculture

Hi s.15;s.19

Regarding your email about Intensive Indoor Agriculture

“Subject: Intensive indoor agriculture

Dear AgriService BC

I have a number of questions regarding the use of ALR land for intensive industrial indoor agriculture and the ability to implement distances from lot lines of neighbouring property's residences also on ALR land.

A the elected director of a rural electoral area with an official community plan that contains an industrial development permit requirement I am trying to find a mechanism to bring comfort to neighbours who also farm fruit vegetables horses etc.

Despite the use on the application to our building department to which the ALC had no comment it is widely understood in the community that the intensive indoor agriculture will be cannabis and unlicensed. Two buildings equaling 14000 square feet are reported to be the installation.

I have read the Bylaw Standard and would like to understand the mechanism to address nuisance factors associated with the ALC permitted farm use of intensive indoor industrial agriculture such as noise and odour by creating appropriate distance and screening from adjacent households but am very clear the farm use is not prohibited.

Thank you for your assistance in this matter.”

My initial response:

I am not certain what questions you are hoping to have answered but offer the following suggestions:



I suggest the RDCK consider its existing zoning bylaws concerning construction of buildings within the ALR and seeing if these bylaws provide setbacks and screening requirements that will help address complaints or concerns of the property owners neighbouring this site. If the existing bylaws do not contain any guidance on building setbacks or screening then the RDCK could consider introducing a zoning bylaw that is consistent with the legal framework of the local government act and farm practices protection act to help reduce the chance for conflict between landowners.

I have several questions about the proposal that might help me understand the situation better. Are the proponents modifying existing buildings or building new structures? Are they planning to build greenhouses or structures fully dependent on artificial lighting? Do you believe that the proponents are hoping to grow and sell recreational rather than medicinal marijuana? Has the RDCK talked to the proponent about minimizing conflict with neighbours around issues of lighting, noise and odour?

The current Federal regulations concerning production of medicinal marijuana include several requirements that would help reduce conflict between neighbours and are likely a good starting point for anyone considering recreational marijuana production. Air scrubbing to reduce odours is required under the federal regulation concerning medical marijuana. The “Access to Cannabis for Medical Purposes Regulation” (ACMPR) is a good source of information on this topic.

As you indicate in your note the ALC has indicated that medical marijuana can be grown on ALR lands. The Ministry’s discussion paper and bylaw standard for medical marijuana production facilities in the ALR is found at: [https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/agriculture-and-seafood/agricultural-land-and-environment/strengthening-farming/local-government-bylaw-standards/medical-marihuana/medical\\_marihuana\\_discussion\\_paper\\_march\\_2\\_2015\\_final.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/agriculture-and-seafood/agricultural-land-and-environment/strengthening-farming/local-government-bylaw-standards/medical-marihuana/medical_marihuana_discussion_paper_march_2_2015_final.pdf) A range of possible setback distances from marijuana production facilities and other structures and boundaries is found on Page 17.

This discussion paper was written when the Federal Medical Marihuana Production Regulation was in force, it has since been replaced by the ACMPR regulation noted above.

If you have future questions for the Ministry of Agriculture that I can help with as  
s.15;s.19 please feel free to write/call me  
directly.

Regards,

s.15;s.19

– BC Ministry of Agriculture

s.15;s.19

**From:** s.15;s.19 PSSG:EX  
**To:** s.15;s.19

**Cc:**  
**Subject:** For your information : Alberta Cannabis Framework  
**Date:** Thursday, October 5, 2017 13:23:24  
**Attachments:** [image001.jpg](#)  
[Draft Alberta Cannabis Framework - Embargoed until 1030am MDT.pdf](#)  
[Summary of Alberta Strategy.docx](#)

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Good afternoon,

Attached you will find the Draft Alberta Cannabis Framework and a one page word document prepared by the Secretariat of the highlights of their framework.

Sending along for your interest/ information.

s.15;s.

---

**From:** Ethan Bayne [mailto:Ethan.Bayne@gov.ab.ca]  
**Sent:** Wednesday, October 4, 2017 10:44 AM

**Subject:** Alberta Cannabis Framework  
Colleagues,

I am pleased to share with you that this morning, Alberta's Minister of Justice, Kathleen Ganley, released the [draft Alberta Cannabis Framework](#) at a news conference in Calgary. The draft Framework outlines Alberta's proposed approach to cannabis legalization, and a pdf version is attached here for your information.

The public release of the draft Framework marks the beginning of the Government of Alberta's second phase of engagement on cannabis legalization. All Albertans and stakeholders are invited to take an online survey about the draft Framework at [www.alberta.ca/cannabis](http://www.alberta.ca/cannabis), or provide their thoughts via a written submission to the Alberta Cannabis Secretariat. Survey responses and written submissions will be accepted until midnight on October 27, 2017.

It is anticipated that the final version of the Alberta Cannabis Framework will be released later this fall.

If you have any questions, please don't hesitate to contact me.

Regards,

Ethan

**Ethan Bayne**

Executive Director, Strategy and Planning  
Alberta Cannabis Secretariat  
Government of Alberta  
Cell: 780-217-1826  
Email: [ethan.bayne@gov.ab.ca](mailto:ethan.bayne@gov.ab.ca)



This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This message contains confidential information and is

**From:** Hayward, James  
**To:** s.15;s.19 : AGRI:EX; "Dijby.Sall@mapag.gouv.qc.ca"; s.15;s.19 AGRI:EX; "anna.ilnyckyj@ontario.ca"; "cmmorrison@gov.pe.ca"; "Ryan.Bourgeois@gnb.ca"; "Katie.Sandhu@gov.mb.ca"; "Shiferaw.Adilu@gov.ab.ca"; "Robert.Moss@gov.sk.ca"; "Bruce Brolley"; "Fernandes, Tamara (OMAFRA)"; "Penner, Jason AG (jason.penner@gov.sk.ca)"  
**Cc:** Rattray, Brian; Trickey, Mike  
**Subject:** FPT Working Group on Cannabis  
**Date:** Wednesday, June 20, 2018 07:14:33  
**Attachments:** Cannabis MIN DM Annual Conference juin 19 - FRE.ppt  
Cannabis MIN DM Annual Conference June 19 - ENG.ppt

---

Hello all,

My apologies for not distributing sooner but I have attached the current deck (now out of date after last night's vote) on cannabis that will be discussed at an ADM level meeting tomorrow.

Happy to receive comments or schedule a call. My suggestion would be to discuss early next week and I could debrief on the ADM discussion and next steps.

Regards,

James

James Hayward

Acting Director, Strategic Policy Branch

Agriculture and Agri-Food Canada / Government of Canada

[James.Hayward@agr.gc.ca](mailto:James.Hayward@agr.gc.ca) / Tel: 204-259-4198 / TTY: 613-773-2600

Directeur par intérim, Direction générale des politiques stratégiques

Agriculture et Agroalimentaire Canada / Gouvernement du Canada

[James.Hayward@agr.gc.ca](mailto:James.Hayward@agr.gc.ca) / Tél. : 204-259-4198 / ATS : 613-773-2600

**From:** s.15;s.19 GRI:EX  
**To:** s.15;s.19 GRI:EX  
**Cc:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** FW: Cannabis briefing / Présentation sur le cannabis  
**Date:** Monday, June 4, 2018 09:15:26

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FYI – this just came in from AAFC addressed to the FPT ADMs.

Not sure s.15;s.1 plans on dialing in yet, if we are interested in listening in let me know.  
s.15;s.19

---

**From:** INTERGOV (AAFC/AAC)  
**Sent:** 04 June 2018 09:00:00 (UTC-08:00) Pacific Time (US & Canada)  
**To:** Bernard Verret ; bernie MacIsaac ; Brian Matheson ; Cammy Colpitts; Cathy LaRochelle; Corriveau, Pierre; Dave Burdek ; David Hunt ; Ernest ; Gray, Brian;s.15;s.19 AGRI:EX; Jurgutis, Steven; Keith Deering ; kelly Kaylo; kim.embleton@gnb.ca; Lee Auten ; Loretta ; Manon Moreau ; phi ; Rosser, Tom; Sadie Perron ; Saindon, Gilles; Seppey, Frédéric; Shawn Jaques ; Taylor, Jane; Tracy St.Denis ; William  
**Cc:** Lloyd, Rosser; Del Bianco, Francesco; MacDonald, Katherine; Hayward, James; Martin, Susan; Trickey, Mike; Proctor, Jody; Martin, Sylvie; Wake, Alex; Kirkish, Doli; Gerrard, Chelsey; O'Regan, Lee Ann; Donihee, Lauren; Campbell, Carolyn; Andrée-Josée Baril; Andrew Breau ; Basia ; brendan ; christine.west; Deidre Plosz Rowley; Dian Ling; Helen ; Janette Leask; Josée Morin; Kirsty Morskyi; Laurie Williamson ; lisa ; Lisa Devine ; Marjorie ; Mathew Ball ; Melanies.15;s.19 AGRI:EX; Pat Bowes ; Patrick Muzzi; Renee; Roberta Goodfellow;s.15;s.19 GRI:EX; Shirley Stuible; Susan Murray ; Tammy Smith ; Temesha  
**Subject:** Cannabis briefing / Présentation sur le cannabis

Good morning,

As requested at previous meetings, a briefing from Health Canada officials on security related to outdoor cannabis production has been scheduled for Wednesday, June 6, from 12:30 – 1:15 p.m.

**Dial-in number: 1 877-413-4781**

**Conference codes:** s.15;s.16

Thank you

.....  
Bonjour,

Comme demandé lors de la réunion précédente, une présentation en matière de caution sur les plantations extérieures du cannabis sera donnée par des représentants de Santé Canada et est prévue pour mercredi le 6 juin de 12 h 30 à 13 h 15.

**Numéro de téléphone : 1 877-413-4781**

**Code d'accès :** s.15;s.16

Merci

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** Fw: 300FECAE-AB8F-47E0-9716-F43888715A7B  
**Date:** Wednesday, November 1, 2017 06:29:24  
**Attachments:** s.13

---

Sent from my BlackBerry 10 smartphone on the TELUS network.

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, November 1, 2017 6:03 AM  
**To:** s.15;s.19 RI:EX; s.15;s.19 AGRI:EX  
**Subject:** 300FECAE-AB8F-47E0-9716-F43888715A7B

---

Have you guys seen this memo? Will be discussed during DM Working Group this morning.

Page 037 of 381 to/à Page 038 of 381

Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 ²SSG:EX  
**To:** s.15;s.19 [AGRI:EX](#)  
**Subject:** FW: AGRI Cannabis - Cost projections and policy implications - by Nov 20  
**Date:** Friday, February 16, 2018 11:09:14  
**Attachments:** Cost projections for Ministry of Agriculture fiscal 2018.docx

---

Here it is.

**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** FW: AGRI Presentation fS.15;s.19\_Cannabis\_jan 26 18 - Final Draft.pptx  
**Date:** Friday, January 26, 2018 14:45:45  
**Attachments:** AGRI Presentation foS.15;s.19Cannabis\_jan 26 18 - Final Draft.pptx

---

Sorry – missed you!!

---

**From:** S.15;S.19 AGRI:EX

**Sent:** Friday, January 26, 2018 2:45 PM

**To:** S.15;S.19 AGRI:EX

**Subject:** AGRI Presentation foS.15;s.19 \_Cannabis\_jan 26 18 - Final Draft.pptx

Hs.15;s. - there were a number of issues/corrections, we tried to address some of it by building up front what will happen when all cannabis is legalized. s. 13

s.13 :tc. Also, there is no status quo because of the change that will come. I can walk through this with you – withs.15;s. – if that helps.



Page 041 of 381

Withheld pursuant to/removed as

s.13; s.14; s.12

Page 042 of 381

Withheld pursuant to/removed as

s.12; s.13; s.14

**From:** s.15;s.19 :PSSG:EX  
**To:** s.15;s.19 :AGRI:EX  
**Cc:** s.15;s.19 :PSSG:EX;s.15;s.19 :AGRI:EX  
**Subject:** FW: BC LPs  
**Date:** Tuesday, August 15, 2017 14:05:11  
**Attachments:** EDMS-#572257-v1-List of LPs in BC and publicly available contact info.docx

---

Hi s.15;s.19

Further to our conversation regarding Health Canada licensed producers on ALR, the Office of Medical Cannabis was only able to provide the information that is publicly available on the ACMPR website. As per the comments below, they provided a list of the available information, which was done for other provinces and territories on similar requests.

We will have to contact the individual licensed producers to find out their physical locations within British Columbia, provided they voluntarily disclose the information. Hopefully the information attached will be useful to the Ministry of Agriculture.

Please let me know if you require any further information.

Thanks,

s.15;s.19

---

**From:** s.15;s.19 :PSSG:EX  
**Sent:** Monday, August 14, 2017 7:02 AM  
**To:** s.15;s.19 :PSSG:EX  
**Cc:** s.15;s.19 :PSSG:EX  
**Subject:** BC LPs  
Hi s.15;s.19

Here is the info from Health Canada regarding BC licensed producers. Please pass on to agriculture.

Thanks

s.15;s.19

a

---

**From:** Apse, Krista (HC/SC) [<mailto:krista.apse@canada.ca>]  
**Sent:** Monday, August 14, 2017 6:44 AM  
**To:** s.15;s.19 :R PSSG:EX  
**Subject:** s.15;s.19

My colleagues in the Office of Medical Cannabis have provided this list.

It is the information that is available publicly, which is what we are able to share with you/your colleagues.

Another P/T had made a similar request, and this is what was provided to them.

s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** FW: Cab Sub Cannabis Legal Summary  
**Date:** Wednesday, April 11, 2018 13:57:26  
**Attachments:** s.14

---

Hi s.15;s.1

Please see our edits. We have attached all the legal opinions on cannabis and not included them as they are very long and numerous.

I hope these help.

s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, April 10, 2018 2:16 PM  
**To:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Cannabis on ALR cab sub  
Hi s.15;s.19

As discussed, here is the first of two cab subs. I should have the second to you by end of day. I told s.15;s.1 that I've have them to her by end of day tomorrow.

Please review and suggest any required changes. Please note the format is from a template (attached) suggested for use by the Secretariat and s.15; has requested I insert legal opinions as an Appendix.

Thanks, s.15;s.1

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15;s.19

Page 045 of 381

Withheld pursuant to/removed as

s.12; s.13

Page 046 of 381

Withheld pursuant to/removed as

s.13; s.12

**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** FW: Cannabis Briefing for Alternative Minister  
**Date:** Monday, January 15, 2018 14:40:02

---

FYI

I'm not sure what this means for timing of your materials. We would want s.15;s.19 to see your papers before the draft framework, I would think. Thoughts?

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, January 15, 2018 10:28 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** FW: Cannabis Briefing for Alternative Minister

Direction has come forward to engage with s.15;s.19 on the agriculture policy issues related to cannabis legalization.

s.15;s.19

Ministry of Agriculture  
s.15;s.19

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, January 15, 2018 10:26 AM  
**To:** s.15;s.19 PSSG:EX  
**Cc:** s.15;s.19 SSG:EX; s.15;s.19 PSSG:EX; s.15;s.19 PSSG:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: Cannabis Briefing for Alternative Minister  
s.15;s.19

I am good either way in working with s.15;s.19 office.  
Perhaps if you could give me an idea with the briefing materials are ready, and then my office can reach out to s.15;s.19 and arrange the briefing. Might also involve MLP's senior MA as well.  
s.15;s.19

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**From:** s.15;s.19 PSSG:EX  
**Sent:** January 15, 2018 9:30 AM  
**To:** s.15;s.19 AGRI:EX <s.15;s.19@gov.bc.ca>  
**Cc:** s.15;s.19 PSSG:EX; s.15;s.19 @gov.bc.ca; s.15;s.19 PSSG:EX  
s.15;s.19 @gov.bc.ca; s.15;s.19 PSSG:EX; s.15;s.19 @gov.bc.ca  
**Subject:** Cannabis Briefing for Alternative Minister

Good Morning s.15;s.19 - following up discussion at last week's dm working group, the secretariat will put together a ppt for purpose of updating s.15;s.19 on the cannabis file, generally, and work with your staff to identify the Ministry of Agriculture specific issues (particularly those two points captured in last week's project report). Would you like us to engage with s.15;s.19 office for purpose of setting a time for a briefing or leave that to your office? I don't think it's a rush but it'd be good to get it done in

next couple of weeks prior to release of the framework document.

s.15;s.1 I've advised s.15;s.19 office we'll be briefings.15;s.19

s.15;s.19 let's keep his office looped in on when that happens. One of the

M.A.'s may wish to sit in.

s.15;

s.19



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** FW: Cannabis Cab subs  
**Date:** Tuesday, February 13, 2018 16:27:18  
**Attachments:** s.12;s.13

---

This includes the attachments that were part of the first email, although I'm sure s.1 is keeping you in the loop. 5:s.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Friday, February 9, 2018 5:07 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** Cannabis Cab subs

Hi s.15;s.

As discussed, I have asked s.15; to schedule a discussion for us on Tuesday next week to review the cannabis cab subs. Note: these are not official drafts I am submitting to you as my ED but rather a draft version requiring manager guidance. Content for these cab subs has been provided by the AGRI Cannabis working group and s.15; has reviewed the s.12;s.13

I have attached both cab subs. 12

Thanks s.15;s.19

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** s.12;s.13  
**Date:** Friday, June 8, 2018 07:43:47  
**Attachments:** image001.jpg

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fyi

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, June 7, 2018 4:40 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** Re: s.12;s.13

s.15;s.19 and I spoke about this and confirmed the proposed approach.

Thanks for this,

Sent from my iPhone

On Jun 7, 2018, at 12:19 PM s.15;s.19 AGRI:EX <s.15;s.19 @gov.bc.ca> wrote:

s.15;s.19 as discussed, below is the proposed approach s.12;s.13;s.14  
s.12;s.13;s.14

well,

Thank you.

s.15;s.19

Ministry of Agriculture  
s.15;s.19

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, June 5, 2018 10:54 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** s.12;s.13  
Hs.15;s.19

Further to the conversations s.15;s.19 and I just had with you, I write to confirm  
direction for s.12;s.13

s.12;s.13

Please confirm that this is acceptable at your earliest convenience.

Thank you for your guidance and leadership!

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.12;s.13

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** AGRI:EX  
**Subject:** rev: cannabis policies  
**Date:** Friday, March 23, 2018 14:16:28  
**Attachments:** s.12;s.13;s.19

---

s.15;s.19

Ministry of Agriculture  
s.15;s.19

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, March 20, 2018 8:43 AM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** cannabis policies  
s.15;s.19

The attached ppt is for the agri cannabis policies. It will be revised in two ways, the first is that the question on AGRI programs will be informative vs asking questions which is a good outcome. The second is that the implications in the production options need to be tightened as they do not clearly outline some of the implications of the options clear enough.

Will be putting together a revised version quickly as s.15 is briefing the MO staff on the cannabis file this week. He is asking a staff from the Secretariat to provide the overview so there is an understanding of the provincial direction.

s.15;s.19

Ministry of Agriculture  
s.15;s.19

**From:** s.15;s.19 / PSSG:EX  
**To:** s.15;s.19 / AGRI:EX  
**Subject:** FW: Cannabis Secretariat follow-up  
**Date:** Wednesday, January 31, 2018 16:31:27

---

Hi s.15;s.19

I understand you've been working with the Cannabis Secretariat Policy team on ALR issues. s.15;s.19  
s.15;s.19, presented at the Union of BC Municipalities Electoral Area Directors meeting yesterday and received a question regarding cannabis production facilities on ALR land.

I'm hoping you may be able to provide some context/clarification around the concerns the s.15;s.19 has outlined below. Any info you can provide is appreciated. Please give me call if you have any questions.

Thanks!

s.15;s.19

- -  
Cannabis Legalization and Regulation Secretariat  
Policing and Security Branch | Ministry of Public Safety & Solicitor General  
Direct s.15;s.19

-----Original Message-----

From: Ramona Faust [mailto:RFaust@rdck.bc.ca]  
Sent: Wednesday, January 31, 2018 3:25 PM  
To: s.15;s.19 / PSSG:EX  
Subject: Re: Cannabis Secretariat follow-up

Dear s.15;s.19

Thank you so much for contacting me.

I represent a rural area adjacent to the City of Nelson in the Regional District of Central Kootenay. The area is unzoned and has a Official Community Plan in the eastern portion of the electoral area.

There is a fair amount of land in the Agricultural land reserve throughout Area E.

The issue is as follows

1. the medical marijuana licenses have had two or three iterations.

The first program MMAR did not allow local government or police notification or provide any rigour.

Those licenses still exist but can't be moved or volume increased and I have been told license holders can migrate them into a new license format. This license was easily attainable and legitimized many Mom and Pop growers and also a underground unregulated sharing economy with unauthorized buildings. One such facility burnt in my area taking the life of a young man. These are still very prevalent on ALR and Rural Residential land.

The second iteration AMMR? was a more rigorous program and excluded Mom and Pop growers by virtue of the rigour and cost of investment required. Also given most ALR land has a home and is not eligible for consideration to be licensed under the Ministers Bylaw Guidance Document and Health Canada.

In the RDCK Area E most specifically we have had applications for building permits indoor intensive agriculture on ALR land with a home on the property and in an area with households on either side. It is a shared domestic water system. The proponent has told neighbours it will be a licensed marijuana facility. Currently it would be impossible for this facility to be licensed because of residential proximity.

Because the buildings are deemed farm buildings there are no provisions for ensuring a livable distance from neighbouring homes, property lines no requirement for screening fencing nor odour control and the water for o

other small mixed farms are in question on this unincorporated water system.

Our staff referred the two 40x80 buildings to the ALC with the stated use of indoor intensive agriculture and the ALC had no concerns because the buildings were too small.

s.22

Staff have said there are 16 such facilities looking for building permits in the RDCK all with different circumstances and not all on ALR land and likely waiting to migrate old licenses but without new regulations applied.

This is a very dynamic situation but the propensity to use the "farm building" category on ALR land with residences gives way to locating recreational marijuana facilities in agricultural residential neighbourhoods without the rigours of those engaged in AMMR

The Ministers 2014 Bylaw Guidebook for Medical Marijuana made provision on page 16 and 17 for development permits for MM and RM on agricultural land I have asked staff to develop this tool in the area covered by an OCP in Area E.

The ALC had cautioned me that we shouldn't be looking to prevent the establishment of licensed facilities so I am concerned their acceptance of these tools may be in question.

This is not the intent to prevent them...its to prevent criminality and keep livable communities for long time taxpayers and entice new families to safe communities. Marijuana has been present in rural areas for four decades and we have seen the good the bad and the ugly.

I look forward to a society where it is just a preference and not a crime.

Thank you for your interest.

Ramona Faust  
Director RDCK Area E

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: s.15;s.19 PSSG:EX" s.15;s.19

Date: 2018-01-31 9:40 AM (GMT-08:00)

To: Ramona Faust <RFaust@rdck.bc.ca>

Subject: Cannabis Secretariat follow-up

Hi Ramona,

Thank you for attending s.15;s.19 presentation on Cannabis Regulation in BC yesterday afternoon. As discussed, I'm following-up on your question regarding cannabis production facilities on ALR land. You mentioned the province's Farm Practices Protection (Right to Farm) Act and spoke about medical cannabis facilities currently in operation.

Are you able outline your questions, or provide more information about your specific concerns? Bullet form is fine.

Thank you again for taking the time to bring your concerns to our attention. I look forward to hearing from you.

s.15;s.19

Cannabis Legalization and Regulation Secretariat Policing and  
Security Branch | Ministry of Public Safety & Solicitor General  
Direct: s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Subject:** FW: CAP Eligibility - Cannabis (Ontario)  
**Date:** Thursday, March 15, 2018 08:57:41

---

**From:** Rutgers-Kelly, Amy (OMAFRA) [mailto:Amy.Rutgers-Kelly@ontario.ca]

**Sent:** Thursday, March 15, 2018 8:49 AM

**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX

**Cc:** Florio, Basia (OMAFRA)

**Subject:** RE: CAP Eligibility - Cannabis (Ontario)

Hi s.15;s.19

Please find below Ontario's responses for the cannabis inquiries.

- Have you made a decision to include, exclude or selectively restrict eligibility of recreational cannabis in CAP designated programs?
  - At this point in time, cannabis will be eligible for Ontario's CAP strategic initiatives programming, provided applicants comply with broader program eligibility requirements (e.g. provide a Farm Business Registration number, are in compliance with the law, etc.).
- If you have made a decision to include, what types of designated programs are eligible?
  - As above. Cannabis is eligible for all designated programs offered in Ontario provided eligibility requirements are met.
- Will hemp receive a renewed or increased focus, if so in what areas?
  - At this time, hemp does not receive renewed/increased focus in Ontario's designated programs.
- Are you aware of any plans related to cannabis in BRM and/or other insurance-type products that are offered?
  - Cannabis and BRM/insurance type programs is under discussion in Ontario.

---

**From:** s.15;s.19 AGRI:EX [mailto:s.15;s.19@gov.bc.ca]

**Sent:** March-08-18 1:20 PM

**To:** 'Lesiuk, Mike (AGR)'; 'Bourgeois, Ryan (DAAF/MAAP)'; 'MacDonald, Cindy'; 'Alexandra Poirier (alexandra.poire@mapag.gouv.qc.ca)'; Rutgers-Kelly, Amy (OMAFRA); Florio, Basia (OMAFRA); 'Bobby Cameron'; McKay, Brendan (OMAFRA); 'Carla (New) (clmillar@gov.pe.ca)'; 'cmmorrison@gov.pe.ca'; 'Darren Chase'; 'David Loewen'; 'Ernest Walker'; 'Laureen Kennedy'; 'Mathew Ball'; 'Sarah-Sophie Julien'; 'Wendy McCormick'

**Cc:** 'Carnegie, Wendy (AGR)'; 'Arrus, Katia (AGR)'; 'Lalla, Mike (AGR)'

**Subject:** CAP Eligibility - Cannabis

Hello all,

We are wondering the status of other PTs decision making related to cannabis eligibility under CAP designated programs, especially after the FPT DM Retreat. To date, BC has not made any decisions in these areas.

The questions are:

- Have you made a decision to include, exclude or selectively restrict eligibility of recreational cannabis in CAP designated programs?
- If you have made a decision to include, what types of designated programs are eligible?
- Will hemp receive a renewed or increased focus, if so in what areas?

- Are you aware of any plans related to cannabis in BRM and/or other insurance-type products that are offered?

**s.12;s.13**

Thanks in advance,  
**s.15;s.19**

Corporate Governance, Policy & Legislation Branch  
Ministry of Agriculture  
Government of British Columbia  
**s.15;s.19**



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 FIN:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** FW: CONFIDENTIAL: Cannabis Presentation  
**Date:** Thursday, September 7, 2017 14:14:37  
**Attachments:** s.12;s.13

---

Please see cabinet presentation on cannabis scheduled for Sept 13<sup>th</sup>.

I'd like to send a short key messages to the Minister on Sept 11<sup>th</sup> (I can review them on the 13<sup>th</sup>).

Basically we just need some messages around:

s.12;s.13

s.15;s.19

*Ministry of Agriculture*  
s.15;s.19

s.14

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** FW: Decision documents  
**Date:** Friday, May 11, 2018 11:53:31  
**Attachments:** Key Decisions one-pager AGRI items.docx  
Draft DN AG SG re AGRI.docx

---

Can you take a look and get back to me?

---

**From:** s.15;s.19 PSSG:EX  
**Sent:** Friday, May 11, 2018 11:49 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 PSSG:EX  
**Subject:** Decision documents

Hi s.15;s.19 - Further to our conversation last night, I put together the attached notes to support taking the AGRI decisions to a joint AG/SG meeting. The first would be used at the meeting in addition to your two BNs. The second would go to the SG and AG after the meeting (assuming support for the recommended options) to document their support; it assumes prior sign-off of your BNs by s.15;s.19 s.15;s.19

If you are satisfied that these notes accurately capture your recommendations (and subject to approvals on our end), and once s.15;s.19 has approved your BNs, we can arrange for this to go on the agenda for a joint SG/AG meeting.

Please let me know if you have any questions or concerns.

Thank you,  
s.15;s.19

Cannabis Legislation and Regulation | Policing and Security Branch  
Ministry of Public Safety and Solicitor General | s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Subject:** FW: DUE JULY 13 - RE: Cannabis production figures for BC and Canada  
**Date:** Wednesday, January 11, 2017 14:49:53

---

Our limited stats information.

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, July 13, 2016 10:36 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** RE: DUE JULY 13 - RE: Cannabis production figures for BC and Canada

Good morning,

No statistics are collected specifically for cannabis production in BC and Canada.

Estimates on the sale and production of Medicinal Marijuana is not currently available due to the following reasons:

- 1) With regard to Statistics Canada's Census of Agriculture and Field Crop Survey:
  - Although the sale and production of Medicinal Marijuana **may** have been captured in the Statistics Canada's Census of Agriculture and in their field crop survey (**if sampled**).
    - For field crops it may have been captured under "*All other miscellaneous crop farming category*", NAICS 111999 [Link NAICS 111999 All other Misc Crops](#)
    - For the Census of Agriculture, if medical marijuana is grown in a greenhouse facility, it may have been captured under "*other greenhouse products*" [NAICS 11141 GH Nursery Floriculture](#)
    - If estimates were captured, they would be combined in these 2 categories, and therefore would not be available.
- 2) With regard to Statistics Canada's Greenhouse, Sod and Nursery Survey:
  - Complete data for this commodity has yet to be fully captured in Statistics Canada's Greenhouse, Sod and Nursery survey, under
    - Other food crops grown under cover NAICS 111419 [Link NAICS 11141 GH Nursery Floriculture](#); or
    - Nursery and tree production: [NAICS 111421 Link NAICS 1142 Nursery & Tree Production](#)
    - In July 2014, Statistics Canada's Standards Division (Horticulture unit) agreed to do a revision in 2017 in their Greenhouse, Sod and Nursery survey to add "*Medicinal Marijuana grown under cover*" in order to capture this evolving industry .
      - Details of the amount of information to be collected (seeded/harvested area, value, NAICS code etc.) are yet to be determined.
- 3) With regard to Manufacturing:
  - Medicinal Marijuana has not been included in [NAICS 325410](#) (Pharmaceutical and medicine manufacturing).

We have no other information to add at this time, except to say that we will ask for an update at Statistics Canada's annual Federal-Provincial-Territorial meeting in Ottawa in October 24-25, 2016.

Regards,  
s.15;s.19

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, July 13, 2016 9:29 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** DUE JULY 13 - RE: Cannabis production figures for BC and Canada  
**Importance:** High

Hi s.15; – Please see s.15;s.19 request below. I haven't heard anything new on this since in 2014 we learned that Statistics Canada will be doing a revision in 2017 and will be adding a new category for "Medicinal Marijuana grown under cover".

Until then it's my understanding that there are no statistics collected specifically for this crop yet. Where it is collected at all it would fall under some general categories:

- Grown as a field crop : NAICS 111999
- Grown under cover: NAICS 111421
- Census would only be including it if it had been reported as an 'other field crop'.

However, things may have changed. There's nothing on the Health Canada website both s.15;s.19 and I have looked.

Please provide response before end of day today.

---

At some point we should also nail down answers to the following questions - if you have time today, great otherwise bring forward to follow-up before end of December 2016:

Would this eventually be included in the FCR for greenhouses? If not then where?

What processing category will it fall in to?

Thank you,

s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, July 13, 2016 8:36 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Cannabis production figures for BC and Canada  
Hi s.15;s.19

Do you have any stats on the cannabis production in BC and Canada? Looking for area of production.

All I've been able to dig up from Health Canada is the number of licences for medical purposes...

currently BC has 8 but I was hoping to put a production amount attached to those licences.

Anything you can dig up would be great, if possible by tomorrow?

Thanks so much.

s.15;s.19

|BC Ministry of Agriculture| s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** FW: Follow up: Medical Marihuana local government bylaw monitoring - March 2017 update  
**Date:** Wednesday, April 19, 2017 09:51:20  
**Attachments:** 2017 March - draft LG MM Bylaw Status.xlsx

---

Hi s.15;s.19 – for your information.  
s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, March 30, 2017 2:22 PM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Follow up: Medical Marihuana local government bylaw monitoring - March 2017 update  
Hi s.15;s.19 – a brief March update on local government bylaws with regards to medical marijuana. Following up from the last November 2016 update, it appears there have been changes with two communities where the actions being undertaken are inconsistent with the bylaw standard or reaffirm their bylaws to prohibit in the ALR.  
**District of Peachland** – (Adopted 12 December 2016) Zoning Bylaw 2100, 2014 by Council. Requires a 100m setback from any ALR boundary. This is typically a 'Farm Bylaw' standard only available 'RTF' Regulated communities with Minister's approval. Peachland's actions are a continuation of their earlier activities.  
**West Kelowna** – February 15, 2017 Council gives first reading to require air filtration in all facilities and to not allow medical marijuana production in greenhouses, plant nurseries or multiple occupancy buildings. These provisions are primarily to address the 'designated' producer facilities that are now included in the federal ACMP regulations (and not found in the older MMP regulations). West Kelowna currently prohibits medical marihuana production in the ALR and requires a 150m setback from Parks and Open Space (P) Zones and from Zones that permits dwellings as a principle use.  
The March 2017 spreadsheet is attached for your consideration. Please let me know if you'd like to discuss further.

Cheers  
s.15;s.19

British Columbia Ministry of Agriculture  
Phone: s.15;s.19 @gov.bc.ca

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, November 22, 2016 1:46 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** Medical Marihuana Update  
Hi s.15;s.19

The following is a short summary of November's medical marihuana update. There have been changes occur with respect to three communities or districts but in each case the actions being undertaken are inconsistent with the bylaw standard.

- **Kitimat Stikine Regional District** - (Oct 21, 2016) the Regional District Board gave final adoption to Bylaw 676, 2016. MMPRs are allowed in the ALR, however several minor bylaw provisions are inconsistent bylaw standards. These are a 150m setback from property lines from community halls and churches.
- **District of Peachland** – (Sept 20, 2016) Zoning Bylaw 2100, 2014 third reading was approved by

Council. Requires a 100m setback from any ALR boundary. This is typically a 'Farm Bylaw' standard only available 'RTF' Regulated communities with Minister's approval. Peachland's actions are a continuation of their earlier activities.

- **Squamish-Lillooet Regional District Electoral Area D** – (Aug 24, 2016) Zoning Bylaw 1350 was adopted by Council. Requires a MLS 60ha (AF Zone) and 10ha (RR Zone).

Additional information is available. Please let me know if you require more detail or a copy of the community "table" document.

Regards

s.15;s.19

Ministry of Agriculture

s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
**Subject:** FW: Greenhouses chat  
**Date:** Friday, May 25, 2018 17:01:09

---

Hi s.15;s.19

Here is the email I referenced but I notice that s.15;s.19 will be  
back Tuesday so can let us know if he received a response.

s.15;

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, May 24, 2018 9:19 AM  
**To:** s.15;s.19 OHCS:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Greenhouses chat

s.15;s.  
Hi,

Nice chatting with you this AM, long time no see.

I thought of you yesterday when I was in a meeting where we were discussing different types of greenhouses, construction and design, regulation, etc.. None of us in this meeting had a code or construction background, and when terms like building bylaws, Farm Code, etc. were coming up with no experts in the room we wondered if there was someone in government who might be able to guide us a bit around some of these issues.

We're primarily concerned with construction typologies, distinctions between concrete based and soil based/open bottom. Is this something which you have much of a familiarity with, such that you could sit in on a meeting to guide us a little? Or if not, is there someone else in government who you might be able to recommend?

Feel free to give me a call later to discuss.

Thanks  
s.15;s.19

British Columbia Ministry of Agriculture  
s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX s.15;s.19 LAGRI:EX  
**Subject:** FW:s.15;s. COGA presentation  
**Date:** Tuesday, January 2, 2018 13:44:28  
**Attachments:** Speaker info Shee s.15; docx

---

s.15;s.19 has been asked to present on cannabis on Feb 1<sup>st</sup>. s.22  
s.22 do not see this happening, but flagging just in case.  
s.15;s.19

Ministry of Agriculture  
s.15;s.19

**From:** Kristianne Hendricks [mailto:s.22]  
**Sent:** Tuesday, January 2, 2018 12:08 PM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** s.15;s. / COGA presentation  
Hello s.15;s.1

I've taken over for Kathleen Zimmerman as the general manager for the BC Council of Management Boards, which operates the Center of Governance in Agriculture (COGA). COGA puts on information/training sessions for our producers, as well as government attendees and other interested parties.

In the information given to me, I have s.15;s.19 scheduled to speak at our February 1st COGA session, on the provincial role in the legalization of marijuana. His email message has directed me to you, s.22 and that you are acting on his behalf.

As his previous conversations were with Kathleen, I'm not sure as to the best way to proceed with some of the details in his absence- confirming his attendance &/ finding someone else who is willing/able to speak in his place s.22, etc. I am attaching the information sheet that I sent to him for your information. Could I get a phone number from you, as well as a time later this week that we could connect about this?

Thanks so much,  
Kristianne

--

Kristianne Hendricks, MA  
General Manager, COMB  
Shorlia Consulting  
Cell: 604-226-5451



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**From:** s.15;s.19 / PSSG:EX  
**To:** s.15;s.19 AGRI:EX  
**Subject:** FW: JCCR Meeting March 2, 2018  
**Date:** Tuesday, February 20, 2018 07:49:07

---

Hi s.15;s.1

Sorry for the multiple emails. After I sent the last email, I went through my notes from the last JCCR meeting, and remembered that local government members of the JCCR wanted to discuss current rules regarding the ALR. I think there may be some confusion around general rules for production on the ALR, as well as current rules for medical cannabis and role of local governments. This will be an item on the agenda, and after you provide an overview of the current rules, there will likely be questions from local government members.

s.15;s.1

---

**From:** s.15;s.19 PSSG:EX  
**Sent:** Tuesday, February 20, 2018 7:39 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** RE: JCCR Meeting March 2, 2018  
Hi s.15;s.19

I don't believe there are AGRI specific questions at this time (most are regarding retail), but rather s.15;s.19 wanted you (or another representative from AGRI) at the meeting to answer any AGRI related questions that may come up during discussions. However, when I have the questions compiled I will ensure that I send your way immediately.

Thanks,

s.15;s.1

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, February 19, 2018 3:22 PM  
**To:** s.15;s.19 PSSG:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** RE: JCCR Meeting March 2, 2018

Okay thanks s.15;s.1. As responses to the questions may need higher level approval and or input from other ministry staff, I would appreciate the questions well in advance of the meeting so that my responses are as thorough as possible.

Thank s.15;s.19

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**From:** s.15;s.19 PSSG:EX  
**Sent:** Monday, February 19, 2018 1:14 PM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** JCCR Meeting March 2, 2018  
Good afternoon s.15;s.1

Some local government members of the JCCR have provided s.15;s.1 with questions regarding the provincial framework, which she plans to table at the next JCCR meeting and provide responses verbally. s.15;s.1 has requested that AGRI be present for the JCCR meeting to participate in discussions – I will put together the questions into one document and ensure you have them available prior to the meeting.

The next JCCR meeting is on Friday March 2, 2018 and will be held in the Vancouver and Victoria (10<sup>th</sup> floor Sussex) PSB boardrooms as a video conference. I will follow this email with the meeting invite, but please let me know if you're able to attend.

Thanks,

s.15;s.19

Cannabis Legalization and Regulation Secretariat  
Policing and Security Branch | Ministry of Public Safety and Solicitor General  
s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s. @ubcm.ca"  
**Cc:** Gary MacIsaac; s.15;s.19 AGRI:EX  
**Subject:** FW: Local governance and cannabis production - technical/operational discussion  
**Date:** Tuesday, April 3, 2018 18:10:05  
**Importance:** High

---

Hi s.15;s.19

s.15;s.19 BC Ministry of Agriculture. I was speaking with Gary MacIsaac recently and mentioned UBCM's concerns about cannabis production and the need for a more informed discussion about related local government tools. I've reached out to policy and planning colleagues at Agriculture, Municipal Affairs & Housing, and the Agricultural Land Commission (see email below), to start a technical/operational discussion with all local governance parties. The provincial leads for the JCCR and Cannabis Secretariat support this deeper dive, and will have a representative participate in this discussion. It will better inform the Secretariat's understanding of local governance issues, and we will also report back into the JCCR. Gary asked that I contact you for UBCM's participation. Just a reminder that we are hoping for a solid technical/operational discussion about local governance-related issues, tools and gaps. Planning and policy practitioners would be very helpful. Please let me know if you need any further information. We hope to initiate this discussion in the next two weeks.

Thanks for your help,  
s.15;s.19

Corporate Governance, Policy & Legislation Branch  
BC Ministry of Agriculture  
s.15;s.19

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, March 27, 2018 6:53 PM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 ALC:EX; s.15;s.19 MAH:EX; s.15;s.19  
ALC:EX; s.15;s.19 MAH:EX; s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 ALC:EX; s.15;s.19  
MAH:EX

**Subject:** Local governance and cannabis production - technical/operational discussion

Hi everyone,

Most of you have been involved in policy discussions around cannabis production in the ALR, either directly with s.15;s.19, or at the Joint Provincial-Local Government Committee on Cannabis Regulation (JCCR). We'd like to work with you to better understand local governance-related issues at a more operational level so we are clear about existing tools, gaps, etc. We intend to invite the UBCM s.15;s.19 to participate. Working with partners is always critical in policy development, but we are confirming JCCR protocol because of its policy role.

Can you please identify who from your group could participate in these discussions? Timing would be to start in the next two weeks, depending on schedules.

Thanks in advance for your help!  
s.15;s.19

**s.15;s.19**

Corporate Governance, Policy & Legislation Branch

BC Ministry of Agriculture

**s.15;s.19**

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** FW: 1 speaking points for s.12;s.13 at CCSSP 9/13  
**Date:** Tuesday, September 12, 2017 10:34:15

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FYI

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Monday, September 11, 2017 5:16 PM  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** s.15: speaking points for s.12;s.13 at CCSSP 9/13

Some key messages for discussions.12;s.13 at Sept13th Cabinet Committee on Shared and Sustainable Prosperity

---

**Suggested Response:**

s.12;s.13

s.12;s.13

s.15;s.19

*Ministry of Agriculture*

s.15;s.19

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Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Subject:** FW: Note request  
**Date:** Tuesday, March 20, 2018 14:21:40

---

s.15;s.19

Ministry of Agriculture  
s.15;s.19

-----Original Message-----

From: s.15;s.19 AGRI:EX  
Sent: Tuesday, March 20, 2018 12:21 PM  
To: s.15;s.19 AGRI:EX  
Subject: FW: Note request

s.15; we have been tasked at creating an info note on s.13 s.15;s.19 is going to draft and reach out for information to inform the note. I spoke briefly with s.12;s.13 and he mentioned that you have good background informations.13 . Can you please send to me so we don't have to re-create?

I will share draft with you once it gets close to final as if we move forward on this and LG's have the decision making authority, a bylaw standard would most likely be required to assist LG's. the other issue is that we have s.13

s.15;s.19

Ministry of Agriculture  
s.15;s.19

-----Original Message-----

From: s.15;s.19 AGRI:EX  
Sent: Tuesday, March 20, 2018 10:49 AM  
To: s.15;s.19 AGRI:EX  
Subject: Re: Note request

Exactly - that's where I got it from. We'll talk further with s.15;s.19

Sent from my iPhone

> On Mar 20, 2018, at 10:38 AM, s.15;s.19 AGRI:EX s.15;s.19 @gov.bc.ca> wrote:

>

> this is one of the options that is being proposed to go forward in s.12;s.13

s.12;s.13

> s.15;s.19

>

> Ministry of Agriculture

> s.15;s.19

>

>

> -----Original Message-----

> From: s.15;s.19 AGRI:EX

> Sent: Tuesday, March 20, 2018 10:07 AM  
> To: s.15;s.19 AGRI:EX  
> Subject: Re: Note request  
>  
> s.15;s.19 did some independent work on the proposal s.13 and we discussed with s.15;s.13  
>  
> s.15;s.19 likes it and I committed to “work it up” and provide a more complete brief  
>  
> Sent from my iPhone  
>  
>> On Mar 20, 2018, at 9:32 AM, s.15;s.19 AGRI:EX s.15;s.19 <@gov.bc.ca> wrote:  
>> s.15;s.19  
>> Can you provide more clarity on the request?  
>> s.15;s.19  
>> Ministry of Agriculture  
>> s.15;s.19  
>>  
>> -----Original Message-----  
>> From: s.15;s.19 AGRI:EX  
>> Sent: Tuesday, March 20, 2018 9:32 AM  
>> To: s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
>> Cc: s.15;s.19 AGRI:EX  
>> Subject: Note request  
>>  
>> s.15;s.19 spoke. s.13  
>>  
>> Can we get a proposal in?  
>>  
>> Sent from my iPhone



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** FW: Note request  
**Date:** Tuesday, March 20, 2018 12:23:23

---

s.15;s.19, we are being asked to create an info not s.13 potential implications.

I have asked s.15;s.19 to draft as even though this is s.13  
s.13 s.13

I know s.15;s.19 has been supporting the file so will leave with you, how best to support this request. I indicated to s.15;s.19 we would need a few days to draft as this is a complicated issue and want to ensure that we frame it in the right way.

s.15;s.19

Ministry of Agriculture  
s.15;s.19

-----Original Message-----

**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, March 20, 2018 10:49 AM  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Re: Note request

Exactly - that's where I got it from. We'll talk further with s.15;s.19

Sent from my iPhone

> On Mar 20, 2018, at 10:38 AM s.15;s.19 AGRI:EX s.15;s.19 @gov.bc.ca> wrote:

>  
> this is one of the options that is being proposed to go forward in s.12;s.13

s.12;s.13  
s.15;s.19

> Ministry of Agriculture  
> s.15;s.19

>  
>

> -----Original Message-----

> **From:** s.15;s.19 AGRI:EX  
> **Sent:** Tuesday, March 20, 2018 10:07 AM  
> **To:** s.15;s.19 AGRI:EX  
> **Subject:** Re: Note request

> s.15;s.19 did some independent work on the proposal s.13 and we discussed with s.15;s.19

s.13

> s.15;s.19 likes it and I committed to "work it up" and provide a more complete brief  
>

>  
> Sent from my iPhone  
>  
>> On Mar 20, 2018, at 9:32 AM, s.15;s.19 AGRI:EX s.15;s.19 @gov.bc.ca> wrote:  
>>  
>> Can you provide more clarity on the request s.15;s.19  
>> s.15;s.19  
>>  
>> Ministry of Agriculture  
>> s.15;s.19  
>>  
>> -----Original Message-----  
>> From: s.15;s.19 AGRI:EX  
>> Sent: Tuesday, March 20, 2018 9:32 AM  
>> To: s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX s.15;s.19 AGRI:EX  
>> Cc: s.15;s.19 AGRI:EX  
>> Subject: Note request  
>>  
>> s.15;s.19 spoke. Wants the proposed approach on designated farm use and greenhouses.  
>>  
>> Can we get a proposal in?  
>>  
>> Sent from my iPhone

**From:** s.15;s.19 (AGR)  
**To:** s.15;s.19 \GRI:EX  
**Subject:** FW: outdoor production of cannabis  
**Date:** Friday, April 6, 2018 13:26:15  
**Attachments:** DRAFT-Impact Assessment of Outdoor Cannabis Production.docx

---

Hi s.15;s.19

Thanks for the discussion today. As promised, please see attached draft we received from Bruce Brolley.

Manitoba's thoughts on outdoor cultivation are:

Manitoba's commentary: Copyright

Copyright

Please let me know if you have any questions.

Have a good weekend,

s.15;s.19

---

**From:** Bruce Brolley [mailto:Bruce.Brolley@gov.ab.ca]

**Sent:** February-22-18 4:06 PM

**To:** s.15;s.19 (AGR)

**Subject:** outdoor production of cannabis  
s.15;s.19

I have given some more thought to the CHTA's concern regarding outdoor cannabis production and came up with this DRAFT document to help sort my mind.

Bottom line, I think that I have managed to convince myself that outdoor cannabis production is not as big of a concern for the industrial hemp industry as I thought it was yesterday morning. The attached DRAFT document is really rough, but I would welcome your thoughts on the principles discussed.

Remember when the federal government talks about cannabis production, they include industrial hemp along with cannabis (large growers, micro-growers and nurseries).

Bruce

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This message contains confidential information and is

intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail.

**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Fw: Production  
**Date:** Wednesday, December 13, 2017 16:20:56  
**Attachments:** [Production policy issues.docx](#)

---

s.15;s.1 FYI.  
9

Sent from my BlackBerry 10 smartphone on the TELUS network.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, December 13, 2017 2:13 PM  
**To:** s.15;s.19 PSSG:EX; s.15;s.19 PSSG:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** RE: Production

---

s.15;s.19  
Hi

For our conversation in 15 mins, I have attached the Production Policy Issues document.

Talk to you soon s.15;s.19

-----Original Appointment-----

**From:** s.15;s.19 PSSG:EX  
**Sent:** Wednesday, December 13, 2017 11:47 AM  
**To:** s.15;s.19, AGRI:EX; s.15;s.19 PSSG:EX  
**Subject:** Production  
**When:** Wednesday, December 13, 2017 2:30 PM-3:30 PM (UTC-08:00) Pacific Time (US & Canada).  
**Where:** 1-877-353-9184 Access code: s.15

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Withheld pursuant to/removed as

s.14

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** FW: Request for review and feedback  
**Date:** Tuesday, January 16, 2018 12:06:28  
**Attachments:** s.12;s.13

---

Here they are. I think the language describing options could be made simpler to aid in understanding them. I see what you are trying to get at but I find myself getting confused about what is the policy intent of each and how they are different. Editing the options to get down to two pages would do wonders in making them clear and concise, which is the hardest part of all this. A good first kick I think.

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Thursday, January 11, 2018 11:08 AM  
**To:** s.15;s.19 AGRI:EX;s.15;s.19 AGRI:EX  
**Subject:** Request for review and feedback  
Hi s.15;s.19

I have attached the s.12;s.13 Can you please review and provide feedback and input? Although four options are presented here, I intend to only have three options in the final submission.

Thank s.15;s.19

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** FW: Request for Review Cab sub  
**Date:** Friday, February 9, 2018 11:00:37  
**Attachments:** s.12;s.13

---

Hi s.15;s.19

Here are some comments. I think you are on the right track. Let me know if you would like to discuss any of my edits.

s.15;s.19

---

**From:** s.15;s.19 AGRI:EX  
**Sent:** Wednesday, February 7, 2018 4:38 PM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX  
**Subject:** Request for Review Cab sub  
Hi s.15;s.1

Can you review the background of this cab sub for me. To ensure it accurately reflects interpretation s.12;s.13 will be submitting to s.15;s.1 to review tomorrow. s.15;s.1 is guiding me through the revisions to the cab sub while s.15;s.19 is engaged in s.13

Thanks, s.15;s.1

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15;s.19



**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Subject:** FW: speaking points for DM Cannabis WG  
**Date:** Tuesday, March 6, 2018 16:03:46

---

s.15;s.19

Ministry of Agriculture

s.15;s.19

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**From:** s.15;s.19 AGRI:EX  
**Sent:** Tuesday, January 9, 2018 10:07 AM  
**To:** s.15;s.19 AGRI:EX  
**Cc:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX;  
s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** speaking points for DM Cannabis WG  
s.15;s.19  
19

We are seeking guidance from the DM's Cannabis WG on how to proceed on the three agriculture related policy issues that ADM's agreed in December to move on now rather than in July.

The three policy issues are as follows:

s.12;s.13

Let me know if you would like anything clarified.

s.15;s.19

Ministry of Agriculture

s.15;s.19

**From:** s.15;s.19 [AGRI:EX](#)  
**To:** s.15;s.19 [AGRI:EX](#)  
**Cc:** s.15;s.19 [AGRI:EX](#); s.15;s.19 [AGRI:EX](#); s.15;s.19 [AGRI:EX](#)  
**Subject:** FW: Terms of reference  
**Date:** Friday, December 1, 2017 10:12:15  
**Attachments:** [Draft Production Sub-Working Group Terms of Reference.docx](#)

---

s.15;s.19 attached is the proposed TOR for the production sub working group. Just for your reference there will also be an Econ Dev Subworking group which has been referenced in these TOR.  
s.15;s.19

Ministry of Agriculture  
s.15;s.19

---

**From:** s.15;s.19 [AGRI:EX](#)  
**Sent:** Friday, December 1, 2017 9:43 AM  
**To:** s.15;s.19 [AGRI:EX](#); s.15;s.19 [AGRI:EX](#)  
**Subject:** Terms of reference

Hi s.15;s.1

I've added a few lines on Economic development as suggested. Would you like<sup>s.15;s.1</sup> to review prior to submission to the Secretariat?

Thanks<sup>s.15;s.19</sup>  
s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15;s.19

**From:** s.15;s.19 PSSG:EX  
**To:** s.15;s.19 AGRI:EX  
**Subject:** FW: Updated LG Outreach Tracking Doc & ALR Resolution  
**Date:** Wednesday, January 31, 2018 14:28:03  
**Attachments:** Resolution 2014-B113 Cannabis Production on ALR.pdf

---

Hi s.15;s.19

As a follow-up to the last JCCR meeting, UBCM had committed to providing their previous resolutions with respect to cannabis production on ALR to the Ministry of Agriculture – I've attached for your reference. Please let me know if you require any further information.

Thanks,

s.15;s.19

Cannabis Legalization and Regulation Secretariat  
Policing and Security Branch | Ministry of Public Safety and Solicitor General  
Ph.s.15;s.19

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**From:** s.22 i@ubcm.ca]  
**Sent:** Thursday, January 25, 2018 1:12 PM  
**To:** s.15;s.19 PSSG:EX s.15;s.19 PSSG:EX  
**Subject:** Undated LG Outreach Tracking Doc & ALR Resolution  
Hi s.15;s.19

Attached is the updated LG outreach tracking document.

s.15;s.1 q I've also attached an endorsed UBCM resolution that speaks to the cannabis production on ALR land issue.

s.22

**From:** s.15;s.19 [AGRI:EX](#)  
**To:** [AGRI:EX](#)  
**Cc:** s.15;s.19 [AGRI:EX](#)  
**Subject:** FYI: FCM Primer on Cannabis  
**Date:** Monday, August 28, 2017 14:53:03

---

s.15;s.19

Hi

FYI – the Federation of Canadian Municipalities has released a ‘primer’ for local governments on Cannabis. I think it’s worth taking a look to see what they are saying to local governments and how they see the role of provincial government regarding cultivation/production.

[https://fcm.ca/documents/issues/Cannabis\\_Legislation\\_Primer\\_EN.pdf](https://fcm.ca/documents/issues/Cannabis_Legislation_Primer_EN.pdf)

I’ll suggest we review and see what would relate in our ‘Options’ Paper.

Cheers.

s.15;s.19

British Columbia Ministry of Agriculture

s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** AGRI:EX  
**Cc:** s.15;s.19 /AGRI:EX  
**Subject:** FYI: UBCM March 28th news releases  
**Date:** Wednesday, April 4, 2018 12:54:58

---

Hi s.15;s.1

Good talking with you this morning. I wanted to follow up on couple of things I mentioned regarding recent UBCM news:

- On March 28th they released a news statement on UBCM Principles for Cannabis Taxation. They mention 'land use' as one of the areas being affected by the new federal regulations. Here's the link: <http://www.ubcm.ca/EN/meta/news/news-archive/2018-archive/ubcm-principles-for-cannabis-taxation.html>
- On March 28th UBCM also released a news statement on their submission regarding the Minister's mandated ALR revitalization initiative. They make a number of recommendations to the Advisory Committee including to:
  - Carefully examine the means of production of recreational cannabis to determine if the expected industrial-style production is the best use of BC's limited agricultural land.
  - Here's the link, it's worth a read: [http://www.ubcm.ca/EN/meta/news/news-archive/2018-archive/submission-on-alr-alc-revitalization.html?utm\\_source=The+Compass+-+March+28%2C+2018&utm\\_campaign=The+Compass+-+March+28%2C+2018&utm\\_medium=email](http://www.ubcm.ca/EN/meta/news/news-archive/2018-archive/submission-on-alr-alc-revitalization.html?utm_source=The+Compass+-+March+28%2C+2018&utm_campaign=The+Compass+-+March+28%2C+2018&utm_medium=email)

s.15;s.19

British Columbia Ministry of Agriculture  
s.15;s.19

**From:** s.15;s.19 AGRI:FY  
**To:** s.15;s.19 AGRI:EX; s.15;s.19 AGRI:EX  
**Subject:** FYI: UBCM Special Resolution on Cannabis  
**Date:** Thursday, August 24, 2017 11:47:00

---

Hi s.15;s.19

UBCM Executive has added a 'Special Resolution' for their Annual Convention on 'Local Government Role in BC Framework for Cannabis'. See pdf pages 8 and 94 in their Annual Report for the resolution here: [http://www.ubcm.ca/assets/About~Us/Annual~Reports/2010-2019/UBCM-Annual%20Report\\_Web\\_low%20res.pdf](http://www.ubcm.ca/assets/About~Us/Annual~Reports/2010-2019/UBCM-Annual%20Report_Web_low%20res.pdf)

From p. 94:

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Therefore be it resolved that the UBCM membership endorse the following principles to guide UBCM's advocacy with

the provincial government regarding local government's role in a BC framework for cannabis:

- fulsome and meaningful provincial consultation with local governments;
- provision of adequate provincial funding to cover any responsibilities and increase in administrative burden of any provincial framework that requires local government participation;
- equitable sharing of tax revenues from cannabis between all orders of government; and
- respect for local choice, jurisdiction and authority, including but not limited to land use and zoning decisions.

--

Something we may want to review later today at our meeting.

Cheers.  
s.15;s.19

British Columbia Ministry of Agriculture  
s.15;s.19

**From:** s.15;s.19 [ALC:EX](#)  
**To:** s.15;s.19 [AGRI:EX](#)  
**Subject:** Implementation of Cannabis \_Discussion with ALC Minutes\_May 31 2017  
**Date:** Tuesday, June 6, 2017 11:28:04  
**Attachments:** S.13 [\\_May 31 2017.docx](#)

---

s.15;s.1

Please note the attached. I have made some amendments for clarity.

I note that you had a lot of questions unanswered. Did we even get to them?

s.15;s.19

**From:** s.15;s.19 [AGRI:EX](#)  
**To:** s.15;s.19 [AGRI:EX](#)  
**Subject:** Implementation of Cannabis Regulation\_Discussion with FIRB Minutes\_Mar 28 2017  
**Date:** Wednesday, March 29, 2017 15:40:01  
**Attachments:** s.13 [\\_Mar 28 2017.docx](#)

---

Hi s.15;s.19 A few edits in purple from me.  
Thank you  
s.15;s.19



**From:** s.15;s.19 PSSG:EX  
**To:** s.15;s.19 [AGRI:EX](#) s.15;s.19 [AGRI:EX](#)  
**Cc:** s.15;s.19 [PSSG:EX](#)  
**Subject:** Improving the Licensing of Production of Cannabis for Medical Purposes  
**Date:** Monday, May 29, 2017 15:59:19  
**Attachments:** [LP and Applicants Distribution as at May 9.docx](#)  
[EDMS-#519780-v2-Tech Briefing Deck - NO TPs.ppt](#)

---

Hi s.15;s.19

For your information, I have attached the documents that I was referring to during our conversation. The first one shows a breakdown of medical cannabis producers per jurisdiction and the second one speaks to the revised licensing process for medical cannabis producers.

Thank you.

s.15;s.19

**From:** s.15;s.19 AGRI:EX  
**To:** s.15;s.19 AGRI:EX  
**Subject:** Industrial Hemp Info  
**Date:** Tuesday, September 12, 2017 14:39:55  
**Attachments:** image001.jpg

---

Hello there s.15;s.19

As discussed, I offer the following information to assist you with your work in respect of the industrial hemp questions you must answer for our Honourable Minister.

Prior to delving into the two topics we discussed, I pause briefly to provide the definition of industrial hemp according to the *Industrial Hemp Regulations* (the “**IHR**”). Industrial hemp means the plant and plant parts of the genera *Cannabis*, the leaves and flowering heads of which do not contain more than 0.3% THC and includes the derivatives of such plants and plant parts. For further clarity, under the IHR, “seed” means any part of an industrial hemp plant that is represented, sold or used to grow a plant.

#### **Information Respecting Seed Use Regulation**

*Cannabis sativa* L. is wind-pollinated and inter-crosses freely. After several generations of reproduction, plant populations cultivated without geographical or mechanical isolation will change and may increase their level of THC. For this reason, industrial hemp producers can only plant pedigreed seed. Seed saving and use of common seed are not currently allowed under the *IHR*.

Pursuant to s. 14(3) of the *IHR*, all industrial hemp crops must be planted using only “pedigreed status” seeds of cannabis varieties listed in Health Canada’s List (the “**List**”) of Approved Cultivators. In other words, farmers can only use seeds that meet two different qualifications under two different regulatory systems: (a) seeds must be pedigreed status seeds under the *Seeds Regulations*; and (b) seeds must only be for cannabis varieties on the List under the *IHR*. I will explain each regulatory requirement in turn.

“Pedigreed status” is a defined term under s. 2(2) of the *Seeds Regulations* and means seed that is of foundation status, registered status, or certified status, or seed that is approved by the Canadian Seed Growers' Association (“**CSGA**”) as being breeder seed or select seed. Foundation, registered, and certified status are further defined for seed that is produced in Canada or elsewhere. Seed that is not produced in Canada must meet the standards for varietal purity established by one of two official certifying agencies (either *The Association of American Seed Control Officials* or *The Organization for Economic Cooperation and Development Seed Scheme*) and must be approved by the CSGA.

For a cannabis variety to be included on the List, it must fulfill two conditions. First, it must be recognized as being a true variety (distinct, uniform and stable) by a responsible authority, such as the OECD Seed Scheme, the Canadian Food Inspection Agency's Variety Registration Program, or the CSGA. Second, that variety can only contain a THC content of 0.3% or less.

The List of Approved Cultivars is updated annually. Varieties found to consistently exceed 0.3% THC may be removed from the List. To access the current List please use the following link:  
<https://www.canada.ca/en/health-canada/services/health-concerns/controlled-substances-precursor-chemicals/industrial-hemp/commercial-licence/list-approved-cultivars-2017-growing-season-cannabis-sativa.html>.

### **Information Respecting the Future of Industrial Hemp**

The Federal Government has announced that federal oversight for hemp will move from the *Controlled Drugs and Substances Act* to the new *Cannabis Act* once the *Cannabis Act* comes into force. Additionally, the Federal Government has committed to ongoing reviews of the existing industrial hemp system with the goal of reducing regulatory burdens for industry and streamlining processes. The Federal Government has already made some changes to the oversight of hemp to better align regulation of industrial hemp with the demonstrated low public health and safety risk of the crop. For example, the Feds have eliminated the need for THC testing for most industrial hemp crops and adjusted licensing renewal dates to align with product sale cycles.

As it stands today, the *Cannabis Act* is fairly silent in respect of industrial hemp. It does not define industrial hemp. Rather, it provides the Governor in Council with the authority to define “industrial hemp” for the purposes of the Act through regulation under s. 139(1)(a). The *Cannabis Act* also automatically carries over all industrial hemp licenses and permits (whether for production, processing, importing, exporting, etc.) issued under the *IHR* (see s. 160 of the *Cannabis Act*). This means that once the *Cannabis Act* comes into force, all *IHR* licences and permits will be treated as though they had been issued under the *Cannabis Act* itself.

Beyond these basic points, I do not know what the future holds for industrial hemp in Canada.

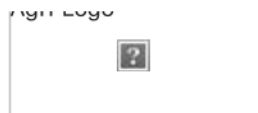
Please let me know if you have any other questions or if I can clarify or improve any of my work on this!

Thanks for pulling me in to assist you ☺ I hope you found this helpful.

Kindly,

s.15;s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15;s.19



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Withheld pursuant to/removed as

s.14

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Invitation to participate in Cannabis Roundtable at SDB meeting in Abbotsford, Tuesday, March 13th  
**Date:** Tuesday, March 6, 2018 10:26:29

---

Good morning s.15,s.19

It would be great to have you join us next week at the Sector Development Branch Professional Development session at the Quality Inn conference facility (Pinnacle Rm #3) at 36035 N Parallel Road in Abbotsford in order to participate in the cannabis roundtable discussion between 1 pm and 3 pm, Tuesday, March 13<sup>th</sup>.

We are having Mathias Schueltz, Chief Science Officer from BioCan Technologies, give a 60 minute presentation focused on the legal history and cultivating methods of medical cannabis in BC in the context of upcoming legalization of cannabis for recreational use. The presentation will be followed by a roundtable discussion to identify knowledge gaps within the Ministry. The primary objective of the contract between Mathias and AGRI is to have the contractor act as a knowledgeable person on behalf of the Ministry of Agriculture to the BC Farm Industry Review Board for farm practices complaints related to two cannabis operations in the Fraser Valley. Through this contract Ministry of Agriculture staff will eventually attain the relevant and necessary expertise to serve as a Knowledgeable Person for cannabis related complaints to BCFIRB.

Regards,

s.15,s.19  
s.15,s.19 – BC Ministry of Agriculture

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Withheld pursuant to/removed as

s.14

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 ALC:EX; s.15,s.19 MAH:EX; s.15,s.19 ALC:EX; s.15,s.19  
A MAH:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 ALC:EX; s.15,s.19 MAH:EX  
**Subject:** Local governance and cannabis production - technical/operational discussion  
**Date:** Tuesday, March 27, 2018 18:53:22

---

Hi everyone,

Most of you have been involved in policy discussions around cannabis production in the ALR, either directly with s.15,s.19 or at the Joint Provincial-Local Government Committee on Cannabis Regulation (JCCR). We'd like to work with you to better understand local governance-related issues at a more operational level so we are clear about existing tools, gaps, etc. We intend to invite the UBCM s.15,s.19 to participate. Working with partners is always critical in policy development, but we are confirming JCCR protocol because of its policy role.

Can you please identify who from your group could participate in these discussions? Timing would be to start in the next two weeks, depending on schedules.

Thanks in advance for your help!

s.15,s.19

Corporate Governance, Policy & Legislation Branch  
BC Ministry of Agriculture

s.15,s.19

**From:** s.15,s.19  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Local government consultation issue RE: Project plan for executive direction: s.12,s.13  
**Date:** Tuesday, May 29, 2018 11:00:16  
**Importance:** High

---

s.13

Thanks,  
s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, May 29, 2018 10:43 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** Project plan for executive direction: s.12,s.13  
**Importance:** High

Hi s.15,s.19 – I've worked with s.15,s.19 to develop this project plan. I am asking you to share this with s.15,s.19 so we are all clear on what is possible s.12,s.13 at this time. It is unrealistic and we urge Executive to communicate to the Minister that we need more time. s.12,s.13

s.12,s.13 . If we are still to proceed at this time I am seeking Executive direction as whatever we are required to develop will have a level of risk that we can't assess given the limited time s.12,s.13

s.12,s.13

s.12,s.13



Page 110 of 381 to/à Page 111 of 381

Withheld pursuant to/removed as

s.12; s.13

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 PSSG:EX  
**Subject:** Marijuana meeting follow-up - taxation  
**Date:** Friday, January 19, 2018 13:19:13

---

Hi s.15,s.19

Thanks again for helping with my disastrous coffee spill.

I wanted to follow up on the taxation item we were talking about at the meeting today. I was trying to explain that currently medical marijuana producers are not given farm classification by BC Assessment for property taxation purposes. This is regardless of whether they're in the ALR or not. (Even for farmers of products other than medical marijuana, simply being on the ALR and growing something in any amount does not automatically give them farm classification for assessment/taxation purposes – the minimum thresholds for farm receipts are set by BC Assessment and must be proven/maintained by the farmer).

Please see this FAQ on the BC Assessment website for the Assessment Act citation:

<https://info.bccassessment.ca/Services-products/property-classes-and-exemptions/farm-land-assessment/medical-marihuana-property-class>

We heard clearly today from the LG representatives that “it’s not fair for medical marijuana producers to pay no taxes” – this seemed to form part of their opposition to having growers in their jurisdiction, that the LG is getting no taxation benefit. I think this is a misunderstanding on their part that needs to be cleared up. Maybe we can raise it at the next meeting or an email to the group? Obviously this is subject to change with the Cannabis Act and the declassification of marijuana as a narcotic, and it may be different for recreational growing as well, but for the time being medical growers are not given the farm tax exemption.

Overall the meeting was very interesting and I appreciated being there, seems like a pretty knowledgeable group. I think the issue of how much an LG can regulate marijuana production in their jurisdiction is a huge one. On the land use planning side, we’re already dealing with a number of municipalities who are struggling to deal with applications for large facilities that they don’t feel equipped to deal with. Looking forward to learning more and helping out however I can.

Thanks

s.15,s.19

British Columbia Ministry of Agriculture  
s.15,s.19

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Withheld pursuant to/removal as

s.14

**From:** s.15,s.19 PSSG:EX  
**To:** s.15,s.19 PSSG:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX  
**Subject:** Mtg background: Cannabis Growers of Canada Dec 4  
**Date:** Tuesday, November 28, 2017 14:47:39  
**Attachments:** 538807.pdf

---

I heard from Tania Jackett this morning – Cannabis Growers of Canada full board of directors will be dialling in for this call Dec 4:

- Don Fauchon, chairman
- Tania Jackett, director
- Chad Jackett, president
- Tanya Ceperly
- Todd Ceperly – (TBC)

I have attached the original incoming correspondence.  
s.15,s.19

-  
Cannabis Legalization & Regulation Secretariat  
Ministry of Public Safety & Solicitor General  
**Direct:** s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** NEW BRUNS\_FW: CAP Eligibility - Cannabis  
**Date:** Friday, March 9, 2018 08:48:39

---

**From:** Bourgeois, Ryan (DAAF/MAAP) [mailto:Ryan.Bourgeois@gnb.ca]

**Sent:** Friday, March 9, 2018 4:25 AM

**To:** s.15,s.19 AGRI:EX

**Subject:** RE: CAP Eligibility - Cannabis

Hi s.15,  
c.1a

New Brunswick does not intend to provide support for medical or recreational cannabis under CAP designated programs. We will be focusing on industrial hemp mainly from a research perspective to determine feasibility of industrial hemp as a rotation crop. We don't plan to offer any insurance products for cannabis or industrial hemp. We will defer to the work of the BRM working group to determine eligibility for other BRM programs.

Ryan

---

**From:** s.15,s.19 AGRI:EX [mailto:s.15,s.19 @gov.bc.ca]

**Sent:** Thursday, March 08, 2018 2:20 PM

**To:** 'Lesiuk, Mike (AGR)'; Bourgeois, Ryan (DAAF/MAAP); 'MacDonald, Cindy'; 'Alexandra Poirier (alexandra.poirier@mapa.gouv.qc.ca)'; 'Amy Rutgers Kelly'; 'Basia Florio'; 'Bobby Cameron'; 'Brenda McKay'; 'Carla (New) (clmillar@gov.pe.ca)'; 'cmmorrison@gov.pe.ca'; 'Darren Chase'; 'David Loewen'; 'Ernest Walker'; 'Laureen Kennedy'; 'Mathew Ball'; 'Sarah-Sophie Julien'; 'Wendy McCormick'

**Cc:** 'Carnegie, Wendy (AGR)'; 'Arrus, Katia (AGR)'; 'Lalla, Mike (AGR)'

**Subject:** CAP Eligibility - Cannabis

Hello all,

We are wondering the status of other PTs decision making related to cannabis eligibility under CAP designated programs, especially after the FPT DM Retreat. To date, BC has not made any decisions in these areas.

The questions are:

- Have you made a decision to include, exclude or selectively restrict eligibility of recreational cannabis in CAP designated programs?
- If you have made a decision to include, what types of designated programs are eligible?
- Will hemp receive a renewed or increased focus, if so in what areas?
- Are you aware of any plans related to cannabis in BRM and/or other insurance-type products that are offered?

We are working on some cabinet documents and would like to include a general idea of what other PTs may be considering. We will also be including a statement that indicates PTs can decide to make cannabis eligible or ineligible in the future, as allowed under the CAP agreements.

Thanks in advance,

s.15,s.19

Corporate Governance, Policy & Legislation Branch  
Ministry of Agriculture  
Government of British Columbia

s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** Options ALR land use\_v. S. Comments  
**Date:** Friday, January 12, 2018 09:51:21  
**Attachments:** Options ALR land use\_v. S. Comments.docx

---

Hi s.15,s.19 : Attached are comments on the document. I think that the current process around acceptable uses in the ALR could be applied to cannabis production. The biggest issue with Regional Agrologist is covering the ALR with bunker style buildings that are not that easily converted to any other agricultural use. These building would be more in-line with industrial uses which is currently a big compliance issue in the ALR.

s.13,s.16

Let me know if you have any questions.  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** Organic Cannabis Certification  
**Date:** Thursday, February 15, 2018 15:39:45

---

Hi s.15,s.19,

It was nice to meet you via teleconference earlier!

As we discussed earlier, the COABC Accreditation Board (AB) has had interest from several of their Certifying Bodies (CB) to certify cannabis. The AB would like to find out from AGRI if this can be considered a certifiable agricultural crop.

There are two types of production being considered 1. Field crop production - soil grown marijuana on farms; 2. Greenhouse grown. The AB believes that both production systems would fit within the scope of the existing Canada Organic standard for crops and/or greenhouse.

You mentioned earlier that you don't see anything that will preclude COABC from offering certification to organic growers, but that you would confirm with the feds. If they are allowed to offer certification, is there anything they need to do other than beginning to certify?

Thanks,

s.15,s.19

BC Ministry of Agriculture | s.15,s.19

s.15,s.19

**From:** s.15,s.19 [PSSG:EX](#)  
**To:** s.15,s.19 [AGRI:EX](#)  
**Subject:** Possible mtg: Cannabis Growers of Canada Dec 4 afternoon  
**Date:** Friday, November 24, 2017 10:49:11

---

H s.15,s.19 would you be available for a teleconference with the Cannabis Growers of Canada on the afternoon of Dec 4?  
s.15,s.19

Cannabis Legalization & Regulation Secretariat  
Ministry of Public Safety & Solicitor General  
**Direct:** s.15,s.19



**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** PPT fo s.15,s.1 draft, and further background  
**Date:** Thursday, January 25, 2018 16:53:04  
**Attachments:** [Ministry of Agriculture - cannabis considerations.docx](#)  
[AGRI Presentation fo s.15,s.19 Cannabis v5 - draft.pptx](#)

---

Hi s.15, : – hope this is hitting the mark for this first high level meeting/briefing – we can definitely do more in the morning.

Thanks,

s.15,s.19

**From:** s.15,s.19 [AGRI:EX](#)  
**To:** s.15,s.19 [AGRI:EX](#)  
**Subject:** Presentation on Cannabis s.15,s.1 \_v2.pptx  
**Date:** Tuesday, January 23, 2018 10:57:34  
**Attachments:** Presentation on Cannabis s.15,s.1 \_2.pptx

---

Nice work. These are my thoughts on the level of detail at this stage. A final slide should indicate we'll come back with more detailed information to support s.15,s.19 decisions about subs. I'll try to end my mtg with s.15,s by 11:30 so we can discuss!

19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Project plan for executive approval s.12,s.13  
**Date:** Tuesday, May 29, 2018 08:42:25

---

Does this make sense, s.15,s.19 Is there any other direction we need? We need clear parameters or we won't make the timeframe. I've added in s.15,s.19 required timing. I want to send this to s.15,s.19 for her agreement as well as s.15,s.19. We need a plan to stick to.  
s.12,s.13

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Withheld pursuant to/removed as

s.12; s.13

**From:** s.15,s.19 [AGRI:EX](#)  
**To:** s.15,s.19 [AGRI:EX](#) s.15,s.19 [AGRI:EX](#)  
**Cc:** s.15,s.19 [AGRI:EX](#)  
**Subject:** Project plan for executive direction: s.12,s.13  
**Date:** Tuesday, May 29, 2018 10:43:05  
**Importance:** High

---

Hi | <sup>s.15</sup><sub>s.1</sub> – I've worked with s.15,s.19 : to develop this project plan. I am asking you to share this with .s.15,s.19 so we are all clear on what is possible s.12,s.13 at this time. It is unrealistic and we urge Executive to communicate to the Minister that we need more time. s.12,s.13

s.12,s.13 If we are still to proceed at this time I am seeking Executive direction as whatever we are required to develop will have a level of risk that we can't assess given the limited time s.12,s.13

s.12,s.13

s.12,s.13

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Withheld pursuant to/removed as

s.12; s.13

**From:** Ferraro, Kevin (OMAFRA)  
**To:** s.15,s.19 AGRI:EX; [ketic.sandhu@gov.mb.ca](mailto:ketic.sandhu@gov.mb.ca); [ryan.bourgeois@gnb.ca](mailto:ryan.bourgeois@gnb.ca); [cindymacdonald@gov.nl.ca](mailto:cindymacdonald@gov.nl.ca); [david.briggins@novascotia.ca](mailto:david.briggins@novascotia.ca); [cmmorrison@gov.pe.ca](mailto:cmmorrison@gov.pe.ca); [Djiby.sall@mapaq.gouv.qc.ca](mailto:Djiby.sall@mapaq.gouv.qc.ca)  
**Cc:** Elliott, Sarah (OMAFRA)  
**Subject:** PT Cannabis Discussion Group  
**Date:** Thursday, December 21, 2017 06:52:35  
**Attachments:** [PT discussion group contacts 12-21-17.docx](#)

---

Good morning,

I just wanted to follow up with the attached contact information we have collected for the group so far. Please let us know if anything was captured incorrectly.

Thanks to those that have already responded to the doodle poll. This link will also take you to it.

<https://doodle.com/poll/aaspqz7pbrxcaxz5>

We would suggest a one hour meeting to start things off (maybe 1:30-2:30p.m. EST). We can pull together an agenda once we settle on a date but feel free to let us know if there is anything you would like to discuss in particular and we can keep a list going for the group.

Thanks again,

Kevin

Kevin Ferraro

Senior Policy Advisor

Economic Development Policy Branch

Ontario Ministry of Agriculture, Food, and Rural Affairs

T: 519.826.3875

C: 226.971.1748

**From:** s.15,s.19 AGRI:EX  
**To:** "Oddi, Jacqueline (HC/SC)"; Urteaga, Eric (HC/SC)  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX; s.15,s.19 PSSG:EX; s.15,s.19 AGRI:EX  
**Subject:** Questions  
**Date:** Wednesday, January 24, 2018 08:53:31  
**Attachments:** AGRI Frontline provider Questions HC discussion.docx

---

Hi Jacqueline and Eric,

I have attached a list of questions to provide a starting place for our discussion today.

Thanks, s.15,s.19  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19



**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: 300FECAE-AB8F-47E0-9716-F43888715A7B  
**Date:** Wednesday, November 1, 2017 09:40:35

---

s.14

Please let me know if I can clarify any of these thoughts or assist any further.

Thank you,

s.15,s.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, November 1, 2017 9:21 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** FW: 300FECAE-AB8F-47E0-9716-F43888715A7B  
fyi

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, November 1, 2017 9:19 AM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: 300FECAE-AB8F-47E0-9716-F43888715A7B

s.14

s.14

s.14

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, November 1, 2017 6:03 AM  
**To:** s.15,s.19 AGRI:EX;s.15,s.19 AGRI:EX  
**Subject:** 300FECAE-AB8F-47E0-9716-F43888715A7B

Have you guys seen this memo? Will be discussed during DM Working Group this morning.

**From:** s.15,s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** RE: AGRI cannabis working group meeting\_Agenda and Materials.  
**Date:** Friday, July 28, 2017 11:38:37

---

H s.15,s.19

Sorry for not providing much input during the last meeting. I struggled to process all of the information s.15, was sharing...he speaks quickly (at least, it seemed that way on the phone). In the end, I was not sure what direction we were going with the document and did not feel I could provide any meaningful input.

I took another look at the document this morning and would like to provide some input. It helped me to wrap my head around the request...I hope it is somewhat helpful to you. Please call if you'd like to discuss.

I struggle with the current options in the document. First, the three options are too generic. Second, I don't think many AGRI programs will have a measurable impact on sector economic development (with respect to production). I would prefer to highlight specific programs that may assist the sector. As I see it, the objective of this document is to discuss how AGRI/the Province can support sector growth to attain local economic benefits (= jobs and tax revenue). As I said at a previous meeting, two keys are:

1. The Fed gov't needs to licence local producers, and
2. Systems must be in place to enable the sector to establish and sell their product in BC.

Of course, those are outside the scope of this assignment since they are not production issues. If we focus on production, I feel the objective becomes to increase the competitiveness of producers in BC. Clearly, production must occur in BC to attain most of the economic benefits of non-therapeutic cannabis.

What can the Province do to increase sector competitiveness? I have suggested a few options below but I am confident the committee can come up with more.

s.13

Province.

I feel this could be easily incorporated into the current options. It just requires specific programs to be highlighted in the options.

Regards,

s.15,s.19

**From:** s.15,s.19 AGRI:EX

**Sent:** Wednesday, July 26, 2017 12:47 PM

**To:** s.15,s.19 y AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX; AGRI:EX;

s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX

**Cc:** s.15,s.19 / AGRI:EX, s.15,s.19 AGRI:EX

**Subject:** AGRI cannabis working group meeting\_Agenda and Materials.

Hello AGRI Cannabis Working Group,

This is a reminder for our meeting tomorrow. I have attached the meeting agenda, revised meeting minutes from last week's meeting, as well as a couple of documents that we will discuss during the meeting.

The teleconferencing info is below.

Dial-in Phone Number:

1-877-353-9184

Participant Conference ID: s.15

Thanks s.15,s.19

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 PSSG:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: AGRI decision notes  
**Date:** Monday, May 28, 2018 15:33:35  
**Attachments:** [Key Decisions one-pager AGRI items.docx](#)  
[Draft DN AG SG re AGRI.docx](#)

---

Amended notes are attached; please let me know if you have any concerns.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, May 28, 2018 3:22 PM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: AGRI decision notes

s.15,s.19  
9 , I also know that s.15,s.19 asked for some minor revisions to the one page overview of the decisions. Can you please send me the finals so we have a record of the final note?

Thanks  
s.15,s.19

Ministry of Agriculture  
s.15,s.19

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**From:** s.15,s.19 PSSG:EX  
**Sent:** Monday, May 28, 2018 3:16 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: AGRI decision notes

One more thing... there is a Deputy Ministers Working Group meeting this Wednesday, and s.15,s.19 flagged that he may ask s.15,s.19 to give a brief update on these issues – no ppt or anything, just a high level update on the Ministers’ direction. Can you ensure s.15,s.19 is aware?

Thanks,  
s.15,s.19

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Monday, May 28, 2018 3:07 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: AGRI decision notes

s.15,s.19  
H<sub>a</sub> - I don't think s.15,s.19 needs to attend another meeting on this. If he signs the DNs, we'll get SG/AG sign-off via the shorter notes I sent over a couple of weeks ago, and then you should be good to proceed s.12,s.13

s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, May 28, 2018 12:11 PM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** FW: AGRI decision notes

s.15,s.19 apologies for the delay in responding. My understanding is that the dn's have been sent over to s.15,s.19 for signature. Is the next step to organize the three minister meeting to finalize? Will this date be set shortly?

s.15,s.19

Ministry of Agriculture  
s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, May 23, 2018 4:27 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** FW: AGRI decision notes

Hi s.15,s.19

Can you respond to s.15,s.19 question please? I will tell her I have forwarded her inquiry to you.

s.15,s.19  
Thanks,

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Wednesday, May 23, 2018 4:17 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** AGRI decision notes

Hi s.15,s.19 - Can you tell me whether s.15,s.19 has signed off on the decision notes re s.12,s.13

Thank you,  
s.15,s.19

Ministry of Advanced Education | Cell: s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: AGRI decision notes  
**Date:** Monday, May 28, 2018 15:52:26

---

Hi s.15,s.1  
9

I think the softening of language is an improvement overall. However, I find the use of similar but inconsistent terms confusing s.13

s.13

Thanks for asking for my thoughts! I hope they're helpful ☺

s.1  
5

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, May 28, 2018 3:36 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** FW: AGRI decision notes

s.15,s.1  
Hi9

Changes were made to the short DN for s.15,s.19 to be less prescriptive. Can you please review. I think this meets the requirements of what we need.

Thanks, s.15,s.19

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Monday, May 28, 2018 3:34 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: AGRI decision notes

Amended notes are attached; please let me know if you have any concerns.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, May 28, 2018 3:22 PM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: AGRI decision notes

s.15,s.19 I also know that s.15,s.19 asked for some minor revisions to the one page overview of the decisions. Can you please send me the finals so we have a record of the final note?

Thanks  
s.15,s

s.15,s.19

Ministry of Agriculture

s.15,s.19

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Monday, May 28, 2018 3:16 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: AGRI decision notes

One more thing... there is a Deputy Ministers Working Group meeting this Wednesday, and s.15,s.19 flagged that he may ask s.15,s.19 to give a brief update on these issues – no ppt or anything, just a high level update on the Ministers’ direction. Can you ensure s.15,s.19 is aware?

Thanks,  
s.15,s.19

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Monday, May 28, 2018 3:07 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: AGRI decision notes

Hi s.15,s.19 – I don’t think s.15,s.19 needs to attend another meeting on this. If he signs the DNs, we’ll get SG/AG sign-off via the shorter notes I sent over a couple of weeks ago, and then you should be good to proceed s.12,s.13

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, May 28, 2018 12:11 PM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** FW: AGRI decision notes

s.15,s.19  
9 apologies for the delay in responding. My understanding is that the dn’s have been sent over to s.15,s.19 for signature. Is the next step to organize the three minister meeting to finalize? Will this date be set shortly?

s.15,s.19

Ministry of Agriculture

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, May 23, 2018 4:27 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX



**Subject:** FW: AGRI decision notes

Hi s.15,s.19

Can you respond to s.15,s.1 question please? I will tell her I have forwarded her inquiry to you.

Thanks, s.15,s.19

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Wednesday, May 23, 2018 4:17 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** AGRI decision notes

Hi s.15,s.1 - Can you tell me whether s.15,s.19 ..... has signed off on the decision notes re s.12,s.13

Thank you,  
s.15,s.1  
9  
s.15,s.19

Ministry of Advanced Education s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: AGRI Presentation s.15,s.19 Cannabis\_jan 25 18 - Final Draft.pptx  
**Date:** Friday, January 26, 2018 10:51:38  
**Attachments:** AGRI Presentation for Donaldson Cannabis\_jan 25 18 - Final Draft JC Edits.pptx

---

Hi s.15,s.19

I have attached the presentation with corrects highlighted in red and notes inserted to explain corrections.

Thanks, s.15,s.1  
g

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, January 26, 2018 9:54 AM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** AGRI Presentation for s.15,s.19 Cannabis\_jan 25 18 - Final Draft.pptx  
Had a quick conversation with s.15, added a few points. How does this look to you?  
Thanks!

**From:** s.15,s.19 AGRI:EX  
**To:** AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: AGRI Presentation for s.15,s.19\_Cannabis\_jan 26 18 - Final Draft - with notes.pptx  
**Date:** Monday, January 29, 2018 16:18:14

---

Thanks – we will make sure this is included going forward. Thanks again.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, January 29, 2018 3:00 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** Re: AGRI Presentation for s.15,s.19 Cannabis\_jan 26 18 - Final Draft - with notes.pptx  
I spoke with s.15,s.1 and he is good to expand the presentation on AGRI's role with the bullet to include, s.12,s.13  
s.12,s.13

Sent from my BlackBerry 10 smartphone on the TELUS network.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, January 29, 2018 2:55 PM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: AGRI Presentation for s.15,s.19 Cannabis\_jan 26 18 - Final Draft - with notes.pptx  
Hi s.15, – my apology, I thought a bullet was to be including at slide 2 (actual slide 3) re: the  
s.12,s.13

s.12,s.13 I can revise further but I think what's there shouldn't be problematic with s.15, speaking to it.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, January 29, 2018 12:21 PM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Re: AGRI Presentation for s.15,s.19 Cannabis\_jan 26 18 - Final Draft - with notes.pptx  
This deck does not have the additional changes that s.15, requested. It is to have a slide  
s.12,s.13

s.15,s.1 can you confirm the correct deck went forward?

Sent from my BlackBerry 10 smartphone on the TELUS network.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, January 29, 2018 10:05 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Fw: AGRI Presentation for s.15,s.19 Cannabis\_jan 26 18 - Final Draft - with notes.pptx  
AGRI deck with additional notes.

Thanks,  
s.15,s.19

---

**From:** s.15,s.19  
**Sent:** January-29-18 9:59 AM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** AGRI Presentation for s.15,s.19 Cannabis\_jan 26 18 - Final Draft - with notes.pptx

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: AGRI question re: proposed federal regs  
**Date:** Thursday, January 4, 2018 09:09:10

---

Hi s.15,s.19 and s.15,s.

s.13

the primary residence.  
s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, January 4, 2018 8:55 AM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: AGRI question re: proposed federal regs

s.13

s.13

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**From:** s.15,s.19 PSSG:EX  
**Sent:** Wednesday, January 3, 2018 4:42 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: AGRI question re: proposed federal regs  
Of course!

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, January 3, 2018 4:41 PM  
**To:** s.15,s.19 PSSG:EX  
**Subject:** RE: AGRI question re: proposed federal regs  
Hi s.15,s.

I'm just on my way out the door. Can I provide you an answer first thing tomorrow morning?

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Wednesday, January 3, 2018 4:34 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** AGRI question re: proposed federal regs  
Hi s.15,s.19

I'm going through the questions that I received regarding the proposed federal regulations. Can you clarify this question that you submitted for me?

"Are any licenced activities permitted on a dwelling-lot? Will help to inform the policy and regulatory framework for the legislation on right to farm around "normal farming practices" related to the location of production."

s.13

Thanks,  
s.15,s.19

Cannabis Legalization and Regulation Secretariat



**From:** s.15,s.19 MAH:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: BN  
**Date:** Thursday, April 26, 2018 13:54:20

---

Sounds great. Thank you. I will have send back the BN tomorrow.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, April 26, 2018 1:54 PM  
**To:** s.15,s.19 MAH:EX  
**Subject:** RE: BN

I've just asked my colleague to forward it to me.

I'll send it as soon as I get it. I have to leave the office at 2:30 today. I might need to send it tomorrow.

s.15,s.1

9

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**From:** s.15,s.19 MAH:EX  
**Sent:** Thursday, April 26, 2018 1:45 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 MAH:EX  
**Subject:** RE: BN

Do you have that release?

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, April 26, 2018 1:44 PM  
**To:** s.15,s.19 MAH:EX  
**Subject:** RE: BN

s.13 This was an interpretation by ALC made in a news release in 2013/14

---

**From:** s.15,s.19 MAH:EX  
**Sent:** Thursday, April 26, 2018 1:34 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: BN

Hi s.15,s.19. Can you please tell me where in the act I can find this? s.15, is asking. Thx s.15,s.19

However, the Agricultural Land Commission had identified medical cannabis[CBJ1] production as a permitted use in the Agricultural Land Reserve (ALR), allowing[CBJ2] for facilities to be built on ALR land (subject to review with legalization of non-medical cannabis).

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, April 26, 2018 9:39 AM  
**To:** s.15,s.19 MAH:EX  
**Subject:** RE: BN  
Hi s.15,s.19

It was great to finally meet you too!

Yes, I thought about that around 3 am last night!

I've attached the copy with track changes and V2-is the changes I made accepted.

s.15,s.19

---

**From:** s.15,s.19 MAH:EX  
**Sent:** Thursday, April 26, 2018 9:34 AM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** BN

Hi! So lovely to meet with you face to face yesterday. Can you please send me the soft copy of the BN so I can edit and get it back to you? Thx, s.15,s.19

---

s.13

s.13

Page 142 of 381 to/à Page 146 of 381

Withheld pursuant to/removed as

s.14

Page 147 of 381

Withheld pursuant to/removal as

s.12; s.13



Page 148 of 381

Withheld pursuant to/removed as

s.13; s.12

Page 149 of 381

Withheld pursuant to/removed as

s.12; s.13

Page 150 of 381

Withheld pursuant to/removed as

s.12; s.13; s.14

Page 151 of 381

Withheld pursuant to/removed as

s.13; s.12; s.14

Page 152 of 381

Withheld pursuant to/removed as

s.12; s.13; s.14

Page 153 of 381

Withheld pursuant to/removed as

s.14

**From:** s.15,s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** RE: Cab subs  
**Date:** Friday, January 12, 2018 17:24:43

---

We'll need to discuss s.12,s.13 at our meeting on Monday! Have a great weekend.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, January 11, 2018 11:04 AM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** Cab subs  
Hi s.15,s.19

I've attached revised versions of the cab sub options s.12,s.13

s.12,s.13 Would this be possible? I don't think I'm quite ready to do that yet. I spoke with s.15,s. on earlier this week. I'm going to send the options back to her to review as well as to s.15,s.19 who sits on the AGRI cannabis working group.

s.12,s.13

Thanks, s.15,s.  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 PSSG:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 PSSG:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Call with Cannabis Growers of Canada  
**Date:** Tuesday, November 28, 2017 12:28:23

---

Hi s.15,s.19

It's ok to have a few of your colleagues on the call. Please let us know how many will be joining us, their names and positions.

Thank you.

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, November 28, 2017 9:36 AM  
**To:** s.15,s.19 R PSSG:EX  
**Cc:** s.15,s.19 PSSG:EX s.15,s.19 AGRI:EX  
**Subject:** Call with Cannabis Growers of Canada

Hi s.15,s.19,

I'd like to request that a few of my colleagues join in the call with the Cannabis Growers of Canada on Dec 4th.

At the very least s.15,s.19 who is the industry specialist. If able also s.15,s.19

s.15,s.19 and/or s.15,s.19

I don't want to overwhelm with too many participants but thought it might be beneficial to have a few production experts on the call. Let me know what you think.

Thanks. s.15,s.1

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15,s.19



**From:** s.15,s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** RE: Cannabis and Greenhouses  
**Date:** Wednesday, March 21, 2018 16:20:33

---

Hi s.15,s.  
s.15,s.19 is having the same conversation whether cannabis should be grown on agricultural land. See the report: "Treat marijuana like any other farm crop, group tells city - A greenhouse is a greenhouse whether you're growing cannabis or flowers or tomatoes" at <http://www.cbc.ca/news/canada/hamilton/marijuana-growing-1.4581826>.  
s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, March 20, 2018 5:21 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis and Greenhouses  
Thanks s.15,s.  
s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, March 20, 2018 4:41 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis and Greenhouses  
Hi s.15,s.

I spoke to s.15,s.19 about greenhouses and designated farm use. She told me they are not designated uses. Production systems are not designated. I didn't totally understand what she was saying...you may want to talk to her.

I did find a few old briefing notes etc. that deal with some of the issues the greenhouse sector has run into in Delta (attached). There were also documents in our files on:

1. air emissions in the GVRD and greenhouse operations using biomass boilers. This issue appeared around 2004 and was still simmering in 2007. Most of the documents dealt with Windset Farms in Delta and Darvonda (floriculture) in Langley.
2. Delta Residents for a Healthy Community provided a letter on July 6, 2004 that outlined many concerns they had with greenhouse expansion (Windset) in Delta, including: air emissions, land reclamation after a greenhouse goes out of business (e.g. is abandoned), artificial light pollution, and habitat enhancement and negative impact on migratory birds.

We can discuss tomorrow morning. I will be available until 10 am. Then will be out for the rest of the day.

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, March 20, 2018 12:58 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** Cannabis and Greenhouses  
Hi s.15,s.

Can I arrange a time to chat with you this afternoon?

Thanks, s.15,s.19  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19



**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis and Greenhouses  
**Date:** Wednesday, March 21, 2018 08:44:14  
**Attachments:** image001.jpg

---

Hi s.15,s.19

s.15,s.19 is incorrect. Greenhouses are a designated farm use in the ALRUSPR and, as such, cannot be prohibited by local governments (other than regulated communities) nor by treaty first nation governments.

As stated in s. 2(2)(o)(i):

(1.1)The activities designated under this section as farm uses for the purposes of the Act must not be prohibited

(a)by any local government bylaw except a bylaw under section 917 of the *Local Government Act*, or

(b)by a law of the applicable treaty first nation government, if the activity is undertaken on treaty settlement lands.

(2)The following activities are designated as farm use for the purposes of the Act:

...

(o)the construction, maintenance and operation of farm buildings including, but not limited to, any of the following:

(i)a greenhouse;

...

Please let me know if I can provide any additional assistance in respect of this (or any other) question!

Thanks,  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19



---

**From:** s.15,s.19 AGRI:EX

**Sent:** Tuesday, March 20, 2018 5:20 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** FW: Cannabis and Greenhouses  
Hi s.15,s.19

Can you read below and confirm for me that greenhouses are in fact designated farm uses in the ALRUSPR?

Thanks, s.15,s.1

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, March 20, 2018 4:41 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis and Greenhouses  
Hi s.15,s.1

I spoke to s.15,s.19 about greenhouses and designated farm use. She told me they are not designated uses. Production systems are not designated. I didn't totally understand what she was saying...you may want to talk to her.

I did find a few old briefing notes etc. that deal with some of the issues the greenhouse sector has run into in Delta (attached). There were also documents in our files on:

1. air emissions in the GVRD and greenhouse operations using biomass boilers. This issue appeared around 2004 and was still simmering in 2007. Most of the documents dealt with Windset Farms in Delta and Darvonda (floriculture) in Langley.
2. Delta Residents for a Healthy Community provided a letter on July 6, 2004 that outlined many concerns they had with greenhouse expansion (Windset) in Delta, including: air emissions, land reclamation after a greenhouse goes out of business (e.g. is abandoned), artificial light pollution, and habitat enhancement and negative impact on migratory birds.

We can discuss tomorrow morning. I will be available until 10 am. Then will be out for the rest of the day.

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, March 20, 2018 12:58 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** Cannabis and Greenhouses  
Hi s.15,s.19

Can I arrange a time to chat with you this afternoon?

Thanks, s.15,s.19

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** AGRI:EX  
**Cc:** AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis and Local Government Consult  
**Date:** Tuesday, March 6, 2018 17:13:42

---

I think this is a great opportunity<sup>s.15,s.1</sup> I expect the development of questions would include you, s.15,s.19, and others. This may be the starting point for your local governance policy options discussions. So could you also bring ALC staff into this discussion, too, through outreach to s.15,s.1 ? Thanks. And please let me know how I (and s.15,s.1) can help.  
s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, March 6, 2018 9:47 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Cannabis and Local Government Consult  
Hi s.15,s.19

I'd like to get your direction on the following:

s.15,s.19 and I attended the Joint Committee on Cannabis Regulation (LGs and Secretariat) last Friday to answer their questions re: cannabis production on the ALR. We discussed current federal and provincial legislation and local government bylaws, as well as ALR and ALC revitalization and some of the policy considerations and impacts of cannabis production on the ALR.

We have an opportunity to draft questions for UBCM to provide written response to. This opportunity could be useful to give UBCM input into the potential drilled down next set of options. What do you think?

Thanks, s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis and the FPPA  
**Date:** Monday, October 2, 2017 15:54:48  
**Attachments:** image001.jpg

---

Hi s.15,s  
.19

I am still waiting on some information, but I thought that I would share with you what I have so far (below). The information that I am waiting on is further explanation on the mechanics and differences between options 2 and 3 ( The ministry defining best practices, and the Minister using LGIC authority to set standards). I will let you know when I have more information

## Summary:

The Ministry has **three options** for influencing the definition of normal farm practices:

1. Provide the BCFIRB panel with a Knowledgeable Person (KP), who then provides the panel with a report (the panel decides how much weight to give the report). The report can also be used as a tool for settlement between the parties. The report is based on a site visit of the farm, meeting the complainant and the KP's knowledge of the industry and similar farm practices.
2. Defining best practices for specific farm practices which are referenced by the Panel when determining normal farm practice.
3. The Minister has the ability to direct a farm practices study and LGIC authority to set standards for normal farm practice.

The **criteria for determining whether a specific case** is a normal farm practice is both broad and site specific (what is normal in one operation may not necessarily be normal in another because of the site specific factors of that operation):

- What are the industry standards for the practice(s) being complained of?
- What are the practices of similar farms under similar circumstances?
- What are the site specific factors of this operation that would need to be considered (topography, use of the land, degree of disturbance)?

The Farm Practices Protection (Right to Farm ) Act states:

*“normal farm practice” means a practice that is conducted by a farm business in a manner consistent with*

- a. proper and accepted customs and standards as established and followed by similar farm businesses under similar circumstances, and*
- b. any standards prescribed by the Lieutenant Governor in Council, and includes a practice that makes use of innovative technology in a manner consistent with proper advanced farm management practices and with any standards prescribed under paragraph (b)*

### Relevant case law:

Central Saanich (District) v. Kimoff (confirms BCFIRB's authority)

<http://www.courts.gov.bc.ca/jdb-txt/ca/02/01/2002bccca0169.htm>

Ontario decision in Pyke v. Tri Gro

[http://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/organizational-structure/boards-commissions-tribunals/bc-farm-industry-review-board/farm-practices/complaint-decisions/reports-role/pyke\\_v\\_tri\\_gro.pdf](http://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/organizational-structure/boards-commissions-tribunals/bc-farm-industry-review-board/farm-practices/complaint-decisions/reports-role/pyke_v_tri_gro.pdf)

The principles to be applied in determining “normal farm practice” have been considered by the Board and by the Ontario Court of Appeal. They include:

- The balance between farmers and their neighbours has been established by the Act itself. Where a farmer is carrying out a practice in a manner consistent with proper and accepted customs

and standards as established by similar farm businesses under similar circumstances, the complaint must be dismissed.

- Farm operations do not automatically gain protection by showing that they follow some abstract definition of industry standards. The Board's task is not to inquire into simply whether the farm practice is "proper" in the abstract, but also whether it is consistent with proper and accepted customs as established and followed by similar farm businesses under similar circumstances. The inquiry is both fact and site-specific. The same practice may qualify as a normal farm practice in one situation but not in another where the circumstances are different.
- Depending on the practice under review, many relevant factors may be considered in determining normal farm practice, including proximity of the neighbours, their use of land and the degree of disturbance. It may also be relevant whether the farm operation came first.

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15,s.19

Agri Logo



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**From:** s.15,s.19 AGRI:EX

**Sent:** Wednesday, September 27, 2017 11:30 AM

**To:** s.15,s.19 AGRI:EX

**Subject:** RE: Cannabis and the FPPA

Sure thing, I will let you know when I have more information.

s.15,s.

---

**From:** s.15,s.19 AGRI:EX

**Sent:** Wednesday, September 27, 2017 10:11 AM

**To:** s.15,s.19 AGRI:EX

**Subject:** FW: Cannabis and the FPPA

Hi s.15,s.

Can you find out the process steps for defining "generally accepted practices" as used by BC FIRB when hearing complaints?

Do not worry about the cannabis part, I just want to understand what the Ministry's role is and how they are established. We may already have an info/summary on this topic, but feel free to reach out as needed if it does not exist.

The deliverable is a written summary of the steps involved, including the Ministry's role.

Let me know if you have any questions.

Thanks!

s.15,s.19

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**From:** s.15,s.19 AGRI:EX

**Sent:** Wednesday, September 27, 2017 9:19 AM

**To:** s.15,s.19 AGRI:EX

**Cc:** s.15,s.19 AGRI:EX

**Subject:** RE: Cannabis and the FPPA

H s.15,s.19

Thank-you for the heads up. I have briefly spoken with s.15,s.19 and we are going to have a more in-depth discussion as to how to proceed. We predicted complaints from local governments and the public would become more frequent.

I will raised this concern at the inter-ministry cannabis meeting today. The Secretariat has the

contacts in the US, so we can likely get access to those.

I will let you know the outcome of both of those discussions later this week.

Thanks again, s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, September 26, 2017 1:42 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** Cannabis and the FPPA

Hi s.15,s.19 we have been receiving an increase in inquiries with respect to odour from cannabis operations. We haven't received a formal complaint however, it is likely a matter of time before we do.

I was just wondering if any work has been done to define the accepted practices for these operations. I recall in one of our meetings you mentioned that there has been some work done in Oregon and that the Ministry might be contacting them to see what industry standards have been set in that jurisdiction and see if they would be adopted in BC.

Just putting this on your radar at this point!

Thanks,

s.15,s.19

BC Farm Industry Review Board  
s.15,s.19

This message may contain information that is privileged and confidential. If you have received this message in error, please notify me or my office immediately and delete the original transmission without making a copy.



**From:** s.15,s.19 PSSG:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis Assessment Status Across Provinces  
**Date:** Monday, December 4, 2017 09:49:54

---

Thanks, s.15,s.19 I will provide this information to the Alberta researcher.

I will also follow-up with re: applicable taxes and rates.  
s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, December 1, 2017 4:19 PM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis Assessment Status Across Provinces  
Hi s.15,s.19

The information below is the extent of my knowledge in regards to Nicole's questions. I am not familiar with any other provincial taxes that may or may not apply to medical cannabis, I would suggest that you contact other Ministries who have a better understanding of other applicable taxes and rates.

Thanks s.15,s.19

In 2015, the Province amended the Agricultural Land Reserve Use, Subdivision and Procedure Regulation (ALRUSPR) under the ALCA to include production of medical cannabis on the agricultural land reserve (ALR) land as a designated farm use, provided it was produced according to the *Marihuana for Medical Purposes Regulations* (MMPR). At this point, cannabis was considered an agricultural product. Land within the Agricultural Land Reserve does qualify for certain land tax exemptions.

In 2014, the Classification of Land as a Farm Regulation (CLFR) under the *Assessment Act*, was amended to specifically exclude from the definition of "qualifying agricultural use" (QAU) the production of "any substance set out in item...17 [*cannabis*] of the Schedule to the *Narcotic Control Regulations under the Controlled Drugs and Substances Act* (Canada), other than the production of industrial hemp in accordance with the Industrial Hemp Regulations under that Act" This had the effect of excluding medical cannabis production facilities from classification as farms and qualifying for reductions in tax that are available in respect of farms and farmers including property tax, property transfer tax, fuel tax, carbon tax and sales tax.

s.13

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Friday, December 1, 2017 12:00 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis Assessment Status Across Provinces  
Of course! Thanks! ☺

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, December 1, 2017 11:59 AM  
**To:** s.15,s.19 PSSG:EX  
**Subject:** RE: Cannabis Assessment Status Across Provinces  
Hi s.15,s.19

I'll draft a response, it will have to go through the proper channels here before I send it back to you.

Thanks s.15,s.19

**From:** s.15,s.19, PSSG:EX  
**Sent:** Friday, December 1, 2017 11:53 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 PSSG:EX  
**Subject:** FW: Cannabis Assessment Status Across Provinces

Good morning s.15,s.1

I received an email yesterday from Nicole Ng-Muk-Yuen, a policy analyst with the Alberta provincial government, inquiring how the Province of British Columbia currently approaches medical cannabis. Would you be able to assist in answering some or all of these questions? I've already responded to Nicole indicating that I would connect with the proper individuals and send her a response once I have the information. Please let me know whether you can assist.

Thanks s.15,s.19  
s.15,s.19

Cannabis Legalization and Regulation Secretariat  
Ministry of Public Safety and Solicitor General  
Ph: s.15,s.19

---

**From:** Nicole Ngmukyuen [<mailto:Nicole.Ngmukyuen@gov.ab.ca>]  
**Sent:** Thursday, November 30, 2017 9:59 AM  
**To:** s.15,s.19 PSSG:EX  
**Subject:** Cannabis Assessment Status Across Provinces  
Good Morning s.15,s.19

I am currently compiling research on how medical cannabis is being assessed and taxed in other provinces. If you could please provide additional information on the following:

- How are you treating medical cannabis, is it considered an agricultural product or something else?
- Is the whole (or part of) the facility containing medical cannabis assessed and taxed and if so, what is the rate?
- Do you know if there is a plan to assess and tax recreational cannabis production facilities differently from medical cannabis once legalization takes effect, or will they be treated the same?

I appreciate you taking the time to answer my questions and look forward to your responses.

Thank you,

**Nicole Ng-Muk-Yuen**

Policy Analyst | Corporate Strategic Policy  
Corporate Strategic Service Division | Alberta Municipal Affairs  
18<sup>th</sup> Floor, 10155-102 Street | Edmonton, AB T5J 4L4  
Tel: 780-644-3074

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**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** R s.12,s. cab sub\_direction needed  
**Date:** Monday, March 26, 2018 16:18:23

---

My first thoughts but need to think a bit more.

s.15,s.19

Ministry of Agriculture  
s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, March 26, 2018 3:14 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** s.12,s.1 cab sub\_direction needed  
Hj s.15,s.1

Please read below. Is this where you want to go with the implications?

s.12,s.13

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RES.12,s. Cab Sub-New versions  
**Date:** Monday, April 16, 2018 17:29:00

---

Hi s.15,s.19  
s.12,s.13

Regards

s.15,s.  
19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, April 16, 2018 9:01 AM  
**To:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** s.12,s.1 Cab Sub-New versions  
Hello s.15,s.19

I have attached the latest versions of the s.12,s.1 Cab subs. If you have not yet reviewed to provide feedback please use these versions. I believe s.15, will be taking this to the DM working group this Wednesday.

Thanks, s.15,s.  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX  
**Subject:** RE S.12,S. Cab Sub-New versions  
**Date:** Monday, April 16, 2018 21:08:57

---

My two cents on this:

It seems to me we should have a sit down, all of us, s.15 . From my perspective,  
s.12,s.13

won't be in until 9am but I'll catch up wit s.15,s. and see how I can help as soon as I'm there.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, April 16, 2018 6:32 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE s.12,s.13 b Sub-New versions  
He knows and wants to provoke the cabinet discussion.

Sent from my iPhone

On Apr 16, 2018, at 6:29 PM s.15,s.19 AGRI:EX s.15,s.19 @gov.bc.ca> wrote:  
s.12,s.13

Sent from my BlackBerry 10 smartphone on the TELUS network.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, April 16, 2018 6:23 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Fw: s.12,s.13 Cab Sub-New versions  
s.15,s.1 wants an option s.12,s.13  
s.12,s.13

thing in morning. He will be sending a revised version with his comments that he has  
rewrote. s.15,s.

Sent from my iPhone

Begin forwarded message:

**From:** s.15,s.19 AGRI:EX s.15,s.19 @gov.bc.ca>

**Date:** April 16, 2018 at 6:18:34 PM PDT

**To:** 's.15,s.19 AGRI:EX" <s.15,s.19 @gov.bc.ca>

**Cc:** 's.15,s.19 AGRI:EX" s.15,s.19 @gov.bc.ca>, s.15,s.19  
s.15,s.19 AGRI:EX" s.15,s.19 @gov.bc.ca>

**Subject: R s.12,s.13 Cab Sub-New versions**

s.15,s.19 has made suggestions to the ppt and is revising the options.  
s.12,s.13

Sent from my iPhone

On Apr 16, 2018, at 5:28 PM, s.15,s.19 E AGRI:EX  
s.15,s.19 @gov.bc.ca> wrote:

Hi s.15,s.19  
s.12,s.13

Regards  
s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, April 16, 2018 9:01 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** s.12,s.13 Cab Sub-New versions  
Hello s.15,s.19

I have attached the latest versions of th s.12,s.13 Cab subs.

If you have not yet reviewed to provide feedback please use these versions. I believe s.15 will be taking this to the DM working group this Wednesday.

Thanks s.15,s.1

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation

Branch

s.15,s.19

**From:** s.15,s.19 [AGRI:EX](#)  
**To:** [AGRI:EX](#) s.15,s.19 [AGRI:EX](#)  
**Cc:** s.15,s.19 [AGRI:](#) [AGRI:EX](#)  
**Subject:** RE S.12,S. Cab subs  
**Date:** Tuesday, February 13, 2018 16:26:45

---

Hi s.15,s.19 I just a quick note of background to the s.12,s.13 cab sub s.15,s.19 prepared and our overall approach.

I asked her to take a two-times to Cab approach:  
s.12,s.13,s.14

your guidance/support to s.15,s.19  
s.15,s.19

---

**From:** s.15,s.19 [AGRI:EX](#)  
**Sent:** Friday, February 9, 2018 5:07 PM  
**To:** s.15,s.19 [AGRI:EX](#)  
**Cc:** s.15,s.19 [AGRI:EX](#) s.15,s.19 [AGRI:EX](#)  
**Subject:** s.12,s.1 Cab subs  
Hi s.15,s.19

As discussed, I have asked s.15,s.19 to schedule a discussion for us on Tuesday next week to review the s.12,s.13 cab subs. Note: these are not official drafts I am submitting to you as my ED but rather a draft version requiring manager guidance. Content for these cab subs has been provided by the AGRI Cannabis working group and s.15,s.19 has reviewed this s.12,s.13  
I have attached both cab subs.

Thanks, s.15,s.19  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19



**From:** s.22  
**To:**  
**Cc:** s.15,s.19 AGRI:Ex s.22  
**Subject:** Re: Cannabis discussion with Health Canada  
**Date:** Sunday, January 14, 2018 10:41:41  
**Attachments:** BC Public Engagement Environmental Impact Capler and Poirier.pdf  
Brief to HoC.pdf  
Bill C45-Ammendments Enviro Final.pdf  
ATT00001.txt

---

Hello s.15,s.19

It was really nice to meet you last month. Following up on our conversation, I wanted to send you some of the documents I mentioned re. including environmental sustainability measures in legislation for cannabis.

I've attached some submissions my colleague s.22 (cc'd here) and I sent to the bc provincial and federal governments in this regard.

Also, the cannabis conservancy has done some great work developing standards for cannabis cultivation that address these issues

[https://cannabisconservancy.com/wp-content/uploads/2016/09/2016\\_09\\_30-TCC\\_Standards\\_v03.pdf](https://cannabisconservancy.com/wp-content/uploads/2016/09/2016_09_30-TCC_Standards_v03.pdf)

Kind regards,  
s.22

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis DNs  
**Date:** Wednesday, May 16, 2018 16:09:23

---

Notes still go through our eapproval system on our end....the DMO will print off or email documents through the MO for signatures, keep moving along as usual and the process changes past all staff approvals

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, May 16, 2018 2:11 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Re: Cannabis DNs

The notes will need to go through a different approval process than eApprovals with a minister in another ministry. s.15,s.1 can you please assist?

Sent from my iPhone

On May 16, 2018, at 9:44 AM, s.15,s.19 AGRI:EX <s.15,s.19@gov.bc.ca> wrote:

Hi Holly,

As discussed s.15,s.19 from the Secretariat has requested that AGRI's decision notes be signed by s.15,s.19 and sent to the Secretariat. I have sent you the final DNs in eApprovals to add s.15,s.19 signature block and send to Lorie unless she directs other wise.

s.15,s.19  
Thanks,19

s.15,s.19  
Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 [GRI:EX](#)  
**To:** [AGRI:EX](#)  
**Subject:** RE: Cannabis DRAFT DN  
**Date:** Thursday, May 24, 2018 09:41:01

---

Nice work, s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, May 24, 2018 9:26 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Cannabis DRAFT DN

Hi s.15,s.19

I was reviewing the DRAFT DN created by s.15,s.19 at the Secretariat and noted that what was written s.13 was more prescriptive than what had been written in the DN for s.15,s.19. I spoke with s.15,s.19 yesterday and requested the DRAFT DN be re drafted to be less prescriptive. The reason for this is to provide more latitude s.12,s.13  
s.12,s.13

Below I have provided you the specifics of my request.

Here is the recommended option in the DN for s.15,s.19

s.12,s.13

Here is the language in the DRAFT DN for s.15,s.19

s.12,s.13

s.15,s.19 agreed to redraft the note to be less prescriptive. Please let me know if you would like to see the revised version.

Thanks, s.15,s.1

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15,s.19

**From:** s.15,s.19 CSCD:EX  
**To:** s.15,s.19 AGRI:EX s.15,s.19 GRI:EX  
**Cc:** s.15,s.19 CSCD:EX  
**Subject:** RE: Cannabis legalization - mapping out policy analysis  
**Date:** Tuesday, March 7, 2017 07:39:55  
**Attachments:** image001.jpg

---

Hi s.12,s.13 Our rush was really about a call with s.15,s.19 later this week to identify more specifically how local governments will be impacted from a policy perspective. The lead on this is s.15,s.19 and she asked me to submit a few bullets from the perspective of the Property Assessment Services branch s.13,s.16 Once s.15,s.19 and I have submitted to those tcs.12,s.13 s.15,s.19 we can certainly share with you, but there is no urgency for you to respond if you do not have a meeting with s.15,s.19 the works. Hope that makes sense.  
s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, March 6, 2017 4:41 PM  
**To:** tcs.12,s.13 CSCD:EX s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 J CSCD:EX  
**Subject:** RE: Cannabis legalization - mapping out policy analysis  
Hi s.15,s.19

We will have a better idea of which Ministry of Agriculture legislation and policies may intersect with CSCD by Friday of this week. So, if you want to send me what you have identified on Wednesday, I can bring it to our working group meeting on Thursday and compare it to what we have identified. Unfortunately, we are only halfway through the process right now. I do think it is reasonable to say that although we are ultimately confining our list to legislation that the Ministry of Agriculture is responsible for-s.13,s.16

s.13,s.16  
How would a brief 30 minute discussion on Friday work for you?  
s.15,s.19  
a

---

**From:** s.15,s.19 CSCD:EX  
**Sent:** Monday, March 6, 2017 4:26 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX s.15,s.19 CSCD:EX  
**Subject:** RE: Cannabis legalization - mapping out policy analysis

I believe the teleconference with our staff is later this week, so how about it s.15,s.19 and I craft a few bullets for review by Wednesday morning? Does that work?

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**From:** s.12,s.13 AGRI:EX  
**Sent:** Monday, March 6, 2017 4:16 PM  
**To:** s.12,s.13 CSCD:EX  
**Cc:** s.15,s.19 GRI:EX s.15,s.19 CSCD:EX  
**Subject:** RE: Cannabis legalization - mapping out policy analysis  
Hi s.15,s.19

s.15,s.19 (cc'd on this message) is leading our work on cannabis legalization. I definitely see some areas where there will be shared interest between CSCD and AGRI (e.g. land-use in ALR). Maybe we could set up some time later this week to talk it through together?

Cheers,  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15,s.19



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**From** s.15,s.19 :SCD:EX

**Sent:** Monday, March 6, 2017 10:54 AM

**To** s.15,s.19 GRI:EX

**Cc** s.15,s.19 AGRI:EX s.15,s.19 CSCD:EX

**Subject:** FW: Cannabis legalization - mapping out policy analysis

Hi s.15,s. am going to be sending a few bullets to our legislation staff s.13,s.16

and want to make sure we don't duplicate our efforts re: farm/ALR land use and

s.13,s.16 Are you working on anything for s.15,s.19 ? Thanks s.15,s.1

---

**From** s.15,s.19 PSSG:EX

**Sent:** Wednesday, February 22, 2017 12:28 PM

**To** s.15,s.19 CSCD:EX s.15,s.19 CSCD:EX

**Cc** s.15,s.19 CSCD:EX

**Subject:** Cannabis legalization - mapping out policy analysis

Hi s.15,s.19

I hope all is well. I am hoping I could set up some time with you to discuss s.13,s.16

s.13,s.16

s.13,s.16 Please let me know if I have missed anything or alternatively, we can talk about it when we meet.

s.13,s.16

s.13,s.16

I realize that the scope of work required for this analysis is quite extensive and look forward to discussing with you how we can work together to undertake the research and analysis required.

Thank you.

s.15,s.19

Policing and Security Branch, Ministry of Public Safety and Solicitor General

s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis Meeting minutes  
**Date:** Friday, June 16, 2017 11:21:06  
**Attachments:** 20017 June 2 Implementation of Cannabis Discussion with BC FIRB Minutes.docx

---

H s.15,s.1

Minor change

Thanks for stickhandling ☺

s.15,s.19

s.15,s.19

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**From:** AGRI:EX

**Sent:** Wednesday, June 14, 2017 9:39 AM

**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19

AGRI:EX

**Subject:** Cannabis Meeting minutes

Hello all,

My apologies for the delay in getting these minutes out to you.

Please let me know if any changes need to be made to the minutes.

Thanks, s.15,s.1

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15,s.19



**From:** s.15,s.19 MAH:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX s.15,s.19 MAH:EX  
**Subject:** Re: s.12,s.13  
**Date:** Tuesday, February 20, 2018 07:49:16

---

Hi s.15,s.19

In general, I agree with your approach. I would just have one comment for your consideration s.12,s.1  
s.12,s.13

Thanks,

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, February 19, 2018 9:27 AM  
**To:** s.15,s.19 MAH:EX; s.15,s.19 MAH:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** FW: s.12,s.13  
Hello s.15,s.19

Can you please respond to the email below?

Thanks, s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, February 9, 2018 1:52 PM  
**To:** s.15,s.19 MAH:EX; s.15,s.19 MAH:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** s.12,s.13  
Hello s.15,s.19

In drafting s.12,s.13 I would like to write a very high level comment re:  
s.12,s.13

Please let me know if I have not accurately captured your overall suggestions or if I have missed something.

Thanks, s.15,s.1

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 MAH:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: s.12.s.13  
**Date:** Friday, April 13, 2018 16:21:16

---

Thanks very much s.15,s.  
19

Will keep confidential.

Can you add s.15,s.19 to the meeting invite too? Thanks

s.15,s.  
19

---

**From** s.15,s.19 AGRI:EX  
**Sent:** Friday, April 13, 2018 3:22 PM  
**To** s.15,s.19 MAH:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** s.12.s.13

Hi s.15,s.  
s.15,s. '19 instructed me to share with you the s.12,s.13  
s.12,s.13

Thanks, s.15,s.

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Re: Cannabis on ALR new options  
**Date:** Tuesday, April 3, 2018 14:59:26

---

K. Works. Can you have the revised pot to me by mid day tomorrow?

Sent from my iPhone

On Apr 3, 2018, at 2:57 PM <sup>s.15,s.19</sup> AGRI:EX <sup>s.15,s.19</sup> <@gov.bc.ca> wrote:

<sup>s.15,s.1</sup>  
Hg

I made a couple of alterations. What do you think of this?

<sup>s.15,s.19</sup>

<sup>s.13,s.16</sup>

bankers, all types of greenhouses and open air production.

---

**From:** <sup>s.15,s.19</sup> AGRI:EX  
**Sent:** Tuesday, April 3, 2018 1:47 PM  
**To:** <sup>s.15,s.19</sup> AGRI:EX  
**Cc:** <sup>s.15,s.19</sup> AGRI:EX; <sup>s.15,s.19</sup> AGRI:EX  
**Subject:** RE: Cannabis on ALR new options

<sup>s.15,s.1</sup> I would like to focus on 'what' rather than 'how'. My recommendations below.  
<sup>s.13,s.16</sup>

<sup>s.15,s.19</sup>

Ministry of Agriculture  
<sup>s.15,s.19</sup>

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**From:** <sup>s.15,s.19</sup> AGRI:EX  
**Sent:** Tuesday, April 3, 2018 10:55 AM  
**To:** <sup>s.15,s.19</sup> AGRI:EX  
**Cc:** <sup>s.15,s.19</sup> AGRI:EX; <sup>s.15,s.19</sup> AGRI:EX  
**Subject:** Cannabis on ALR new options

Hi I<sup>19</sup> s.15,s.  
s.13,s.16

Thanks s.15,s.  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 M MAH:EX  
**To:** s.15,s.19 AGRI:EX s.15,s.19 MAH:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE:s.12,s.13  
**Date:** Monday, February 19, 2018 15:13:04

---

Hi s.15,s.19

I would like to discuss this idea with s.15,s.19 tomorrow when she back in the office tomorrow.  
s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, February 19, 2018 10:03 AM  
**To:** s.15,s.19 MAH:EX; s.15,s.19 MAH:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE:s.12,s.13

Hi s.15,s.19

In addition to the below, we had discussed at our meetings the likely increased workload on MAH s.12,s.13. I have drafted this high level sentence to reflect our discussion. Is this accurate?  
s.12,s.13

Thanks, s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, February 19, 2018 9:27 AM  
**To:** s.15,s.19 MAH:EX; s.15,s.19 MAH:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** FW:s.12,s.13  
Hello s.15,s.19

Can you please respond to the email below?

Thanks, s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, February 9, 2018 1:52 PM  
**To:** s.15,s.19 MAH:EX; s.15,s.19 MAH:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** s.12,s.13  
Hello s.15,s.19

In drafting the Cab Sub for s.12,s.13  
s.12,s.13

Please let me know if I have not accurately captured your overall suggestions or if I have missed something.

Thanks, s.15,s.19  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 FLNR:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis on Crown land  
**Date:** Tuesday, June 26, 2018 16:21:47  
**Attachments:** Info Note - moratorium on cannabis applications - 2.docx

---

Hi s.15,s.19

I was hoping you could review and comment on the attached draft information note. It has had very limited internal review at this time. I will also be sending to the Cannabis Secretariat for feedback as well.

Regards,

s.15,s.19

Ministry of Forest, lands and Natural Resource Operations

s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, March 22, 2018 2:55 PM  
**To:** s.15,s.19 FLNR:EX  
**Cc:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Cannabis on Crown land

Hi s.15,s.19

I am writing to respond to your written inquiry to s.15,s.19 re: cannabis cultivation on crown land. I am the project lead for cannabis at the Ministry of Agriculture and am happy to engage in a conversation with you about this issue. Please don't hesitate to contact me.

Thanks, s.15,s.19

Hi s.15,s.19

As briefly discussed this morning Lands Branch is wanting to develop interim policy to prevent s.13

Thanks,  
s.15,s.19

Ministry of Forest, lands and Natural Resource Operations

s.15,s.19

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis operation on ALR  
**Date:** Friday, September 15, 2017 14:14:07

---

Hi s.15,s.19 : Just to summarize our discussion:

- Producers regardless of the crop are not exempt from local government development permit requirements. These may include siting and use, percentage lot cover, setbacks from property lines, waterbodies and sometimes neighbours. Any operation of scale should have a strong working relationship with their local government.
- ALC has requirements for deposition of fill in or moving top soil out of the ALR. This is an application driven requirement and should be a first step in any new farm building construction in the ALR.
- The Ministry has developed a Guide to Bylaw Development in Agricultural areas that spells out maximum setbacks for a particular commodity. This allows new operations to see if a particular property is suitable for what they want to do.
- Nuisance complaints from neighbours often around odour, truck traffic, light pollution. These can be escalated to the Farm industry Review Board for decision on what is considered a normal farm practices for a particular activity.
- New Large scale operations regardless of the commodity often get the community concerned. In the case of the greenhouse industry; covering good quality farm soils with glass, water-impermeable surfaces, light pollution if lights are required to extend the growing season. Poultry operations have had their share of odour, noise and dust complaints.

s.15,s.19



**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 PSSG:EX s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX s.15,s.19 PSSG:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19  
**Subject:** Re: Cannabis ppt for AGRI policy issues  
**Date:** Monday, January 29, 2018 09:43:00

---

s.15,s.19 I would expect that s.15,s.19 would be included at minimum in the briefing so please ensure that you are working with s.15,s.19 calendar and schedules. s.15,s.19

Sent from my BlackBerry 10 smartphone on the TELUS network.

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**From:** s.15,s.19 ; PSSG:EX  
**Sent:** Monday, January 29, 2018 9:17 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX  
**Subject:** RE: Cannabis ppt for AGRI policy issues

---

s.15,s.  
Hi 19

Last we heard it was going to be scheduled for this afternoon. We will follow up and let you know asap.

s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, January 29, 2018 9:12 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX  
**Subject:** RE: Cannabis ppt for AGRI policy issues

Hi Sophie, can you please let me know if the briefing date and time have been initiated with s.15,s.19 on cannabis and AGRI policy issues? AGRI is finalizing the slides and will have to the Secretariat today.

Thanks  
s.15,s.19

Ministry of Agriculture  
s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, January 26, 2018 5:41 PM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** FW: Cannabis ppt for AGRI policy issues

Hi s.15,s.19 – here is the draft as requested – not yet approved by our DM.  
Can you please confirm briefing timing?

Thanks,  
**s.15,s.19**

Corporate Governance, Policy & Legislation Branch  
BC Ministry of Agriculture  
**s.15,s.19**

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis producer reporting requirements and data collection  
**Date:** Thursday, September 21, 2017 16:18:59

---

My pleasure s.15,s.19 – and I thought afterwards that I should have added...that even if/when the medical marijuana wholesalers and retailers are included in one of Statistics Canada's surveys – we cannot be certain that data will be available or publically released to the level of detail that you are expecting. This reasons for this would be: (1) suppression of confidential data (i.e., that identify the sales etc., of private businesses) or (2) data that is too unreliable to be published.

If the gathering and publishing of medical marijuana wholesaler and retailer data is considered part of Health Canada's mandate, however, then I would expect to see certain detailed information released that we wouldn't see otherwise via Stats Can. I just don't know enough about the health/medical/pharmaceutical data world to comment on if this sector would fall into that type of data...Staff in the Ministry of Health should know – or very likely someone in s.15,s.19 group at BC Stats.

s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, September 21, 2017 2:29 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis producer reporting requirements and data collection

Excellent! Thank-you s.15,s.19 for your quick review and response.

s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, September 21, 2017 12:25 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis producer reporting requirements and data collection

Hi s.15,s.19

I've review the link and from a provincial data collection perspective I think the feds have the Licensed medical marijuana producers' reporting requirements well covered. The only things I would suggest that could be added are:

s.13

s.13

I think the above starts the discussion. I'll leave it to you to think through and then please feel free to ask me for more or different information. I'm happy to help however I can, and I will forward you s.15,s.19 response once I hear back from him.  
I hope this helps.

Kind regards,

s.15,s.1  
9

s.15,s.19

| BC Ministry of Agriculture | s.15,s.19

Website: <http://www2.gov.bc.ca/gov/content/industry/agriculture-seafood/statistics>

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**From:** s.15,s.19 \AGRI:EX  
**Sent:** Wednesday, September 20, 2017 11:42 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis producer reporting requirements and data collection

s.15,s.1  
H9

Sorry for the confusing text. The Federal government suggests that although the reporting

requirements will be similar, how the data is collected, who it is collected from, the frequency with which it is collected, and the level of detail of data collected may alter or expand.

The Federal government is responsible for production and the provinces are responsible for retail and distribution. Therefore, although the federal government has existing reporting requirements for Medical cannabis production-they do not have reporting requirements for non-medical cannabis production, or retail and distribution reporting requirements for both medical and non-medical.

I hope this explanation is clearer.

With regards to time line, would a couple of weeks be too soon?

Thanks, s.15,s.1  
9

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, September 20, 2017 11:28 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis producer reporting requirements and data collection

Thanks for this s.15,s.1 I'll look at it and get feedback to you shortly. A couple of quick questions: Can you clarify what you're saying in the highlighted text below – its not clear to me. And what is your time frame on this?

Thanks,  
s.15,s.19

s.15,s.19

s.15,s.19

| BC Ministry of Agriculture |

Website: <http://www2.gov.bc.ca/gov/content/industry/agriculture-seafood/statistics>

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, September 20, 2017 11:20 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** Cannabis producer reporting requirements and data collection

s.15,s.  
Hi 19

I am writing to seek your input. I sit on the FPT cannabis Working group for Seed to Sale tracking.

The feds have shared their list of current reporting requirements for licenced medical cannabis producers. The details of the reporting requirements will likely continue and be applied to non-medical cannabis production (with likely evolution in reporting frequency and required detail and are proposing a changing in reporting system)

<https://www.canada.ca/en/health-canada/services/drugs-health-products/medical-use->

[marijuana/licensed-producers/policies-directives-guidance-information-bulletins/licensed-producers-reporting-requirements.html](https://www2.gov.on.ca/marijuana/licensed-producers/policies-directives-guidance-information-bulletins/licensed-producers-reporting-requirements.html)

From a provincial data collection perspective, can you review the link below, Licensed Producers' reporting requirements and suggest any additional reporting requirements that may be useful provincially-think not just from the producer but the distributor and retailer as well (I am mindful that most of our knowledge base is focused on production, but feel free to make suggestions for retail and distribution as well).

If my request is unclear, please don't hesitate to contact me.

Thanks s.15,s.19

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** Re: (s.13  
**Date:** Saturday, March 24, 2018 19:44:59

---

Thanks, s.15,s.19. I followed up with s.15,s.19, I'll make time for you and I to discuss on Mon or Tues. Thanks again for your hard work and dedication on this file. I hope you're having a great weekend.

Take care,  
s.15,s.19

Sent from my iPhone

On Mar 23, 2018, at 12:05 PM, s.15,s.19 AGRI:EX <s.15,s.19@[gov.bc.ca](mailto:s.15,s.19@gov.bc.ca)> wrote:

Hi s.15,s.19  
s.12,s.13

I have also attended two meetings with UBCM through the JCCR with the Secretariat to provide local government opinion specifically related to cannabis on the ALR. We have an opportunity to do further consultation with local governments through this forum if we choose to.

The meeting that was scheduled s.15,s.19 a couple of weeks ago and then was cancelled, was to take place only with a few ministry staff and the purpose of which was to develop a draft Terms of Reference for a potential Working group. The working group would only be established s.15,s.19

s.15,s.19 the focus of the working group would be to establish s.13

s.13 If this working group was established it would be an appropriate venue to invite participants as you have outlined below. However, as the terms of reference have not yet been established for this working group, I believe extending the invite to these participants is premature.

At s.15,s.19 direction I have not sent out the meeting invite. Perhaps we could arrange a time to discuss further on Monday or Tuesday?

Thanks, s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, March 22, 2018 6:18 PM

To: s.15,s.19 AGRI:EX

Subject: Re: s.13

I hope I didn't stress you out! You've got enough going on, OMG.

If tomorrow you can't set up a meeting for early next week (noting agenda to come), I'll do it on Mon, no problem. And then we can discuss what came up today! I hope you're hanging in there. I'm so sorry about the change in direction you got today about the

s.13 I don't understand myself and I'm sorry I wasn't there to help. Hope you're doing okay.

Sent from my iPhone

On Mar 22, 2018, at 12:04 PM, s.15,s.19 AGRI:EX s.15,s.19 <[s.15,s.19@gov.bc.ca](mailto:s.15,s.19@gov.bc.ca)> wrote:

Hi s.15,s.19

The Minister's Advisory Committee just met with UBCM Executive and cannabis s.13

s.13 AGRI needs an immediate policy discussion with MAH and ALC.

s.15,s.19 set up a multi-group mtg on this a few weeks back and it was cancelled due to the cab sub priority. Can you please set up, for early next week, a meeting with you, me s.15,s.19 and s.15,s.19 (ALC), s.15,s.19 (MAH) and your key cannabis secretariat contact at MAH (I forgot her name!), the MAH director of planning (I forgot her name!), s.15,s.19 and her team (planners, she can confirm who), and s.15,s.19 ? Is there anyone else at AGRI we should include?

I can help with the agenda on Mon. To hold the meeting time, please note

s.13

s.13 . We need to better understand the range of concerns, issues and options as soon as possible and across the three agencies. s.15,s.19 can help with a room. Thank you so much.

s.15,s.19

Sent from my iPhone

On Mar 22, 2018, at 9:32 AM, s.15,s.19 AGRI:EX s.15,s.19 <[s.15,s.19@gov.bc.ca](mailto:s.15,s.19@gov.bc.ca)> wrote:

s.15,s.19 I would also strongly recommend a reach out to MAH. s.13

s.13 if they have not already. We should be seeking their feedback as we develop options so that when the info goes forward, we know that MAH will be supportive.

Thanks



s.15,s.19

Ministry of Agriculture  
s.15,s.19

---

**From:** s.15,s.19 AGRI:EX

**Sent:** Wednesday, March 21, 2018 4:51 PM

**To:** s.15,s.19 AGRI:EX

**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19

AGRI:EX

**Subject:** S.13

Hi s.15,s. – I've reviewed s.15,s.1 note which had support

from s.15,s.19 It's a great note. A question

for you: s.12,s.13

s.12,s.13

Thanks – great work, s.15,s.19

s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis production methods  
**Date:** Thursday, May 17, 2018 08:23:53

---

Hi s.15,s.1

Sounds good! I look forward to hearing more and figuring out how to address the concern that was raised in the meeting.



s.15,

---

**From** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, May 16, 2018 4:45 PM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Cannabis production methods  
Hi s.15,s.19

The soil based discussion that took place today raised a concern s.13 implementing the chosen policy decision. I suggest we set up a brief discussion with a few individuals who will be better able to describe the identified issue. s.13

s.13 I'd like to bring you both up to speed on the contents of today's discussion and then schedule another meeting with the larger group for next week.

Thanks, s.15,s.1  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis production on Agricultural Land  
**Date:** Tuesday, December 5, 2017 13:22:12

---

Thanks for this, s.15,s.19 John Turvey says he is happy to share what he garners from the scan.

s.15,s.19

BC Ministry of Agriculture  
s.15,s.19

**Ministry Mission:** World leading stewardship of land, farm and food systems for the health and prosperity of British Columbians

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 Please consider the environment before printing this email.

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, December 1, 2017 4:22 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis production on Agricultural Land

s.15,s.19  
Hi

Here is a very high level response to John's questions. s.13

s.13 . Policy work is still ongoing.

If possible can you ask John if he would be willing to share the results of his scan?

Thanks, s.15,s.19

Thus far the Ministry of agriculture in B.C. has completed the following activities as it relates to cannabis production on agricultural land:

s.13,s.14

s.13

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, November 30, 2017 1:11 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis production on Agricultural Land

Sounds good. Thanks!

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, November 30, 2017 1:11 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis production on Agricultural Land

Ok. I'll try to draft something up either this afternoon or tomorrow for you. If that works?

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, November 30, 2017 1:10 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis production on Agricultural Land

Thanks s.15,s.19

I've chatted with John on the phone and he knows it is early days yet, but was just wondering what stage people are at. A high level response would be great and all that is needed at this point.

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, November 30, 2017 12:50 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis production on Agricultural Land

Ok let me know. I can also give you a high level response re: potential future policy.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, November 30, 2017 12:49 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis production on Agricultural Land

s.15,s.19  
Hi .

I will confirm with John what he is looking for, and then may get you to connect with him directly. He sent this to the agricultural land use planning group, so he may be looking for some specifics around land use planning for recreational marihuana.

Thanks,

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, November 30, 2017 12:47 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis production on Agricultural Land

Hi s.15,s.19

A number of discussions have taken place with Ontario on this topic. The policy and leg unit here at AGRI had a discussion with Ontario AGRI back in September. Not sure if John was on the call, but I think he was. Also, AGRI PTs across Canada are establishing a group to discuss this issue. Therefore I'm surprised John has sent this email as it seems disconnected from the rest of the work happening already.

Perhaps, I should connect with him directly?

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, November 30, 2017 11:34 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** FW: Cannabis production on Agricultural Land

Hi s.15,s.19

I've had an inquiry from John Turvey from the Ontario Ministry of Agriculture (see below) and he is wondering what we are thinking in terms of dealing with recreational marihuana production on agricultural lands. My understanding is that we have yet to form a position on this, but is there anything we can share at this time?

Thanks,

s.15,s.19

BC Ministry of Agriculture  
s.15,s.19

**Ministry Mission:** World leading stewardship of land, farm and food systems for the health and prosperity of British Columbians

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 Please consider the environment before printing this email.

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**From:** Turvey, John (OMAFRA) [<mailto:john.turvey@ontario.ca>]  
**Sent:** Thursday, November 30, 2017 11:30 AM  
**To:** s.15,s.19 AGRI:EX; 'Girard Pierre-Olivier (DGDATA) (Québec)'; 'Janice Harper';

'Candace.Vanin@AGR.GC.CA'; 'Charles-Antoine.Sirois@AGR.GC.CA'; 'jessicamcdonald@bridgewater.ca'; 'Rob.English@gnb.ca'; 'jason.cathcart@gov.ab.ca'; Sarioglu, Liz ALC:EX; 'Judy.Roeland@gov.mb.ca'; 'sheri.grift@gov.mb.ca'; 'rcarey@gov.nl.ca'; 'alan.williams@gov.sk.ca'; 'bryan.gourlie@gov.sk.ca'; 'Quesnel Pierre-Olivier (DRL) (Blainville)'; 'Gordon.Smith@novascotia.ca'; 'Michael.Devanney@novascotia.ca'; Churchyard, Arthur (OMAFRA); Doyle, Victor (MMA); 'reuben.joose@gov.ab.ca'  
**Subject:** RE: Cannabis production on Agricultural Land

Hi all:

I'm curious how different provinces are planning to deal with the issue of cannabis production on agricultural land, anticipating Federal approval of recreational cannabis in mid 2018. We are being asked to provide some direction and thoughts in Ontario.

I know a couple of provinces had formal positions on medical cannabis --- but wondering what you may be thinking in terms of recreational cannabis production.

We already have a number of both licensed and designated growers producing medical cannabis on agricultural land in Ontario. We also have a number of licensed growers located on industrial lands in urban areas.

If you have any thoughts or comments you are willing to share, that would be great.

Thanks!

John.

John Turvey, BA, MPI, MCIP, RPP  
Policy Advisor (Land Use Planning)  
Land Use Planning and Stewardship Unit  
Food Safety and Environmental Policy Branch  
Ontario Ministry of Agriculture, Food and Rural Affairs  
Ph: (519) 826-3555  
Email: [john.turvey@ontario.ca](mailto:john.turvey@ontario.ca)

**From:** s.15,s.19 [AGRI:EX](#)  
**To:** [AGRI:EX](#)  
**Cc:** s.15,s.19 [AGRI:EX](#); s.15,s.19 [AGRI:EX](#); s.15,s.19 [AGRI:EX](#)  
**Subject:** RE: Cannabis Secretariat follow-up  
**Date:** Thursday, February 1, 2018 13:19:19  
**Attachments:** [FW Intensive Indoor Agriculture.msg](#)  
[FW Intensive Indoor Agriculture.msg](#)

---

Hi s.15,s.1

A few comments further to s.15 email:

- I agree with s.1 that it does take a substantial amount of time to adopt a zoning bylaw. As this area doesn't have one, they're unable to efficiently introduce bylaw provisions that could include, among other things, setback distances for production facilities as described in AGRI's Bylaw Guide. These provisions may have addressed Ramona's concern about the existing building being too close to residential uses. (Thanks s.15, s.19 for your comments on this one!)

- As this area does have an OCP, I think Ramona was looking into the feasibility of introducing an OCP Development Permit for the protection of farming to address this issue. I again agree with s. as this not being the right mechanism for this particular concern. (See s.15,s.1 attached email.)

- With regards to the question about "home on ALR not being eligible for a licence", this may come from Health Canada's [webpage](#), which states under the title Physical Security Measures, "Production, packaging, labelling and storage activities under the ACMPR need to be conducted indoors, and not in a dwelling place." There may be some misperception on this as designated persons can produce indoors and outdoors as well (ACMPR Part 2 s172(1)). I don't see anywhere in ACMPR that says a designated person can't produce in the same place as a dwelling. You may know more about this.

- Also, from ACMPR Part 2:

- Location and type of production

193 (1) A person who is authorized by a registration to produce cannabis

(a) may only produce marihuana plants at the authorized site for the production of marihuana plants;

- Cancellation of registration

197 ) Subject to section 198, the Minister must cancel a registration if

(a) the registered person is not eligible under section 174;

(b) the designated person is not eligible under section 176;

(c) the registered person or designated person has contravened section 193

○ I read this to mean they must notify Health Canada if they move. I don't read any mechanism however that would require a 'designated person' to switch to becoming a 'licensed producer' (with its additional requirements), if they notified Health Canada appropriately of the move.

• In terms of siting however, it does point to that (ACMPR 177 4(e)) "the application must also include... if the proposed production area involves outdoor production entirely or partly indoor and partly outdoor production, an indication that the production site is not adjacent to a school, public playground, day-care facility or other public place frequented mainly by persons under 18 years of age;" (5a) . I don't see anything about adjacent to residential uses.

• See <sup>s.15,s.1</sup><sub>9</sub> follow up email to Ramona on his hope "that licensed recreational marijuana production will be communicated in the near future as the requirements for medical marijuana facilities include several setback, air quality and security requirements that should serve to insulate licensed businesses from residential areas."

I hope this helps as well.

s.15,s.19

British Columbia Ministry of Agriculture

s.15,s.19

-----Original Message-----

From <sup>s.15,s.19</sup> AGRI:EX  
Sent: Thursday, February 1, 2018 10:44 AM  
To: <sup>s.15,s.19</sup> AGRI:EX  
Cc: s.15,s.19 AGRI:EX  
Subject: RE: Cannabis Secretariat follow-up

Hi <sup>s.15,s.1</sup><sub>9</sub> I don't think the statement below is accurate. The Guide for Bylaw Development in Farming Areas, 2015 does provide provisions that local governments could enact under zoning bylaws for buffering and setbacks for Medical Marijuana Production Facilities (MMPF). See Pages 21 and 22 of the Guide, link below.

<https://www.alc.gov.bc.ca/assets/alc/assets/library/land-use->



[planning/guide\\_for\\_bylaw\\_development\\_in\\_farming\\_areas\\_2015.pdf](#)

"Because the buildings are deemed farm buildings there are no provisions for ensuring a livable distance from neighbouring homes, property lines no requirement for screening fencing nor odour control and the water for o other small mixed farms are in question on this unincorporated water system."

However despite the setback allowances under the Ministers Bylaw Standard in the Guide the issue of odour would be considered nuisance and have to be part of a Farm Practice complaint unless the Federal regulations spells out mitigation and compliance under the ACMPR.

I realize from speaking with <sup>s.15,s.19</sup> this area does not have land use zoning currently. This would create a big challenge for this local government to develop zoning to address this issue. However I am not sure how the creation of development permits would simplify this process? I believe the LG would like the Ministry or ALC to adopt provincial standards instead. Hope this helps.

s.15,s.19

-----Original Message-----

From <sup>s.15,s.19</sup> AGRI:EX

Sent: Thursday, February 1, 2018 9:28 AM

To: <sup>s.15,s.19</sup> AGRI:EX; <sup>s.15,s.19</sup> AGRI:EX

Cc: <sup>s.15,s.19</sup> AGRI:EX

Subject: FW: Cannabis Secretariat follow-up

Hello <sup>s.15,s.19</sup>

Can you please review Ramona Faust's email below for accuracy and provide at least a partial response by end of day? By partial I mean if you require more time to respond just let me know.

Thanks, <sup>s.15,s.19</sup>

-----Original Message-----

From s.15,s.19 AGRI:EX

Sent: Thursday, February 1, 2018 9:19 AM

To: s.15,s.19 PSSG:EX

Cc s.15,s.19 AGRI:EX

Subject: RE: Cannabis Secretariat follow-up

HI s.15,s.19

I am going to need to consult with a few of my colleagues on this situation. As well, I think this is an excellent example to discuss with Health Canada. I'm not sure about the "home on ALR not being eligible for a licence" There may be some proximity requirement I'm not sure. The regulatory requirements for micro producers hasn't been determined as of yet. The piece I am doubtful about is the rolling over of licences. My understanding is that a person who has a designated producer licence could continue as a designated producer but if they wanted to expand their operation or switch to a micro cultivation licence or standard cultivation licence they would need to meet all the requirements of that licence. In addition, the proposed regs suggest that the "medical access framework would allow for the federal government to refuse designated production if there were reasonable grounds to believe that it would create a risk to public health and safety".

From what I understood at our last meeting with Health Canada, when we discussed water usage, there would be a requirement for licence applicants to demonstrate access to adequate water supply. Whether or not a shared domestic water system would meet this requirement I'm not sure.

There are many overlapping components to this inquiry. It may take me awhile to compile a response.

I will follow-up again at end of day.

s.15,s.19  
Thanks

-----Original Message-----

From s.15,s.19 PSSG:EX

Sent: Wednesday, January 31, 2018 4:31 PM

To: s.15,s.19 AGRI:EX

Subject: FW: Cannabis Secretariat follow-up

Hj s.15,s.19

I understand you've been working with the Cannabis Secretariat Policy team on ALR issues. s.15,s.19, presented at the Union of BC Municipalities Electoral Area Directors meeting yesterday and received a question regarding cannabis production facilities on ALR land.

I'm hoping you may be able to provide some context/clarification around the concerns the EA Director has outlined below. Any info you can provide is appreciated. Please give me call if you have any questions.

Thanks!

s.15,s.19

Cannabis Legalization and Regulation  
Secretariat Policing and Security Branch | Ministry of Public Safety & Solicitor General  
s.15,s.19  
Direct

-----Original Message-----

From: Ramona Faust [mailto:RFaust@rdck.bc.ca]

Sent: Wednesday, January 31, 2018 3:25 PM

To: s.15,s.19 PSSG:EX

Subject: Re: Cannabis Secretariat follow-up

s.15,s.19  
Dear

Thank you so much for contacting me.

I represent a rural area adjacent to the City of Nelson in the Regional District of Central Kootenay The area is unzoned and has a Official Community Plan in the eastern portion of the electoral area.

There is a fair amount of land in the Agricultural land reserve throughout Area E.

The issue is as folmows

1. the medical marijuana licenses have had two or three iterations.

The first program MMAR did not allow local government or police notification or provide any rigour.

Those licenses still exist but cant be moved or volume increased and I have been told license holders can migrate them into a new license format. This license was easily attainable and legitimized many Mom and Pop growers and also a underground unregulated sharing economy with unauthorized buildings. One such facility burnt in my area taking the life of a young man. These are still very prevalent on ALR and Rural Residential land.

The second iteration AMMR? was a more rigorous program and excluded Mom and Pop growers by virtue of the rigour and cost of investment required. Also given most ALR land has a home and is not eligible for consideration to be licensed under the Ministers Bylaw Guidance Document and Health Canada.

In the RDCK Area E most specifically we have had applications for building permits indoor intensive agriculture on ALR land with a home on the property and in an area with households on either side. It is a shared domestic water system. The proponent has told neighbours it will be a licensed marijuana facility. Currently it would be impossible for this facility to be licensed because of residential proximity.

Because the buildings are deemed farm buildings there are no provisions for ensuring a livable distance from neighbouring homes, property lines no requirement for screening fencing nor odour control and the water for other small mixed farms are in question on this unincorporated water system.

Our staff referred the two 40x80 buildings to the ALC with the stated use of indoor intensive agriculture and the ALC had no concerns because the buildings were too small.

s.22

Staff have said there are 16 such facilities looking for building permits in the RDCK all with different circumstances and not all on ALR land and likely waiting to migrate old licenses but without new regulations applied.

This is a very dynamic situation but the propensity to use the "farm building" category on ALR land with residences gives way to locating recreational marijuana facilities in agricultural residential neighbourhoods without the rigours of those engaged in AMMR

The Ministers 2014 Bylaw Guidebook for Medical Marijuana made provision on page 16 and 17 for development permits for MM and RM on agricultural land I have asked staff to develop this tool in the area covered by an OCP in Area E.

The ALC had cautioned me that we shouldn't be looking to prevent the establishment of licensed facilities so I am concerned their acceptance of these tools may be in question .

This is not the intent to prevent them ..its to prevent criminality and keep livable communities for long time taxpayers and entice new families to safe communities. Marijuana has been present in rural areas for four decades and we have seen the good the bad and the ugly.

I look forward to a society where it is just a preference and not a crime.

Thank you for your interest.

Ramona Faust

Director RDCK Area E

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: s.15,s.19 'PSSG:EX" s.15,s.19 'gov.bc.ca>

Date: 2018-01-31 9:40 AM (GMT-08:00)

To: Ramona Faust <RFaust@rdck.bc.ca>

Subject: Cannabis Secretariat follow-up

Hi Ramona,

Thank you for attending s.15,s.19 presentation on Cannabis Regulation in BC yesterday afternoon. As discussed, I'm following-up on your question regarding cannabis production facilities on ALR land. You mentioned the province's Farm Practices Protection (Right to Farm) Act and spoke about medical cannabis facilities currently in operation.

Are you able outline your questions, or provide more information about your specific concerns? Bullet form is fine.

Thank you again for taking the time to bring your concerns to our attention. I look forward to hearing from you.

s.15,s.19

Cannabis Legalization and Regulation  
Secretariat Policing and Security Branch | Ministry of Public Safety & Solicitor General

Direct: s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis Secretariat follow-up  
**Date:** Thursday, February 1, 2018 10:44:05

---

Hi s.15,s.19, I don't think the statement below is accurate. The Guide for Bylaw Development in Farming Areas, 2015 does provide provisions that local governments could enact under zoning bylaws for buffering and setbacks for Medical Marihuana Production Facilities (MMPF). See Pages 21 and 22 of the Guide, link below.  
[https://www.alc.gov.bc.ca/assets/alc/assets/library/land-use-planning/guide\\_for\\_bylaw\\_development\\_in\\_farming\\_areas\\_2015.pdf](https://www.alc.gov.bc.ca/assets/alc/assets/library/land-use-planning/guide_for_bylaw_development_in_farming_areas_2015.pdf)

"Because the buildings are deemed farm buildings there are no provisions for ensuring a livable distance from neighbouring homes, property lines no requirement for screening fencing nor odour control and the water for other small mixed farms are in question on this unincorporated water system."

However despite the setback allowances under the Ministers Bylaw Standard in the Guide the issue of odour would be considered nuisance and have to be part of a Farm Practice complaint unless the Federal regulations spells out mitigation and compliance under the ACMPR.

I realize from speaking with s.15,s.19 this area does not have land use zoning currently. This would create a big challenge for this local government to develop zoning to address this issue. However I am not sure how the creation of development permits would simplify this process? I believe the LG would like the Ministry or ALC to adopt provincial standards instead. Hope this helps.

s.15,s.19

-----Original Message-----

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, February 1, 2018 9:28 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** FW: Cannabis Secretariat follow-up

Hello s.15,s.19

Can you please review Ramona Faust's email below for accuracy and provide at least a partial response by end of day? By partial I mean if you require more time to respond just let me know.

Thanks s.15,s.19

-----Original Message-----

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, February 1, 2018 9:19 AM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis Secretariat follow-up

s.15,s.19  
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may be some proximity requirement I'm not sure. The regulatory requirements for micro producers hasn't been determined as of yet. The piece I am doubtful about is the rolling over of licences. My understanding is that a person who has a designated producer licence could continue as a designated producer but if they wanted to expand their operation or switch to a micro cultivation licence or standard cultivation licence they would need to meet all the requirements of that licence. In addition, the proposed regs suggest that the "medical access framework would allow for the federal government to refuse designated production if there were reasonable grounds to believe that it would create a risk to public health and safety".

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From: s.15,s.19 PSSG:EX  
Sent: Wednesday, January 31, 2018 4:31 PM  
To: s.15,s.19 AGRI:EX  
Subject: FW: Cannabis Secretariat follow-up

Re: s.15,s.19

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s.15,s.19 presented at the Union of BC Municipalities Electoral Area Directors meeting yesterday and received a question regarding cannabis production facilities on ALR land.

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Thanks!

s.15,s.19

Cannabis Legalization and Regulation Secretariat Policing and  
Security Branch | Ministry of Public Safety & Solicitor General  
Direct: s.15,s.19

-----Original Message-----

From: Ramona Faust [mailto:RFaust@rdck.bc.ca]  
Sent: Wednesday, January 31, 2018 3:25 PM  
To: s.15,s.19 PSSG:EX  
Subject: Re: Cannabis Secretariat follow-up

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Our staff referred the two 40x80 buildings to the ALC with the stated use of indoor intensive agriculture and the ALC had no concerns because the buildings were too small.

s.22

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I look forward to a society where it is just a preference and not a crime.

Thank you for your interest.

Ramona Faust  
Director RDCK Area E

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: s.15,s.19 PSSG:EX" s.15,s.19

Date: 2018-01-31 9:40 AM (GMT-08:00)

To: Ramona Faust <RFaust@rdck.bc.ca>

Subject: Cannabis Secretariat follow-up

Hi Ramona,

Thank you for attending s.15,s.19 presentation on Cannabis Regulation in BC yesterday afternoon. As discussed, I'm following-up on your question regarding cannabis production facilities on ALR land. You mentioned the province's Farm Practices Protection (Right to Farm) Act and spoke about medical cannabis facilities currently in operation.

Are you able outline your questions, or provide more information about your specific concerns? Bullet form is fine.

Thank you again for taking the time to bring your concerns to our attention. I look forward to hearing from you.

s.15,s.19

Cannabis Legalization and Regulation Secretariat Policing and  
Security Branch | Ministry of Public Safety & Solicitor General  
Direct: s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis Secretariat follow-up  
**Date:** Thursday, February 1, 2018 10:03:19  
**Attachments:** Follow up RE Intensive Indoor Agriculture.msg

---

Hi s.15,s.19  
a

s.15,s.19 has had similar correspondence with Ramona Faust recently concerning medical marijuana production in ALR.

s.15,s.19 - did you follow up further with Ramona? Could you take a look at Ramona's email - it looks like the same issue. Do you have any further thoughts on this one?

The way I read Ramona's email is that for this one case, the MMAR licensee wants to move to a new address. I would have to look at the ACMPR in further detail, but I think there are now ACMPR rules that Health Canada requires notification of that new address - and could require additional obligations for these 'designated producers' for the new facility that might improve the concerns about fencing, odour and water usage? Is it at Health Canada's discretion?

The second thought is, would creating a Zoning bylaw actually make any difference?

s.15,s.19

British Columbia Ministry of Agriculture

s.15,s.19

-----Original Message-----

From: s.15,s.19 AGRI:EX  
Sent: Thursday, February 1, 2018 9:28 AM  
To: s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX  
Cc: s.15,s.19 AGRI:EX  
Subject: FW: Cannabis Secretariat follow-up

Hello s.15,s.19

Can you please review Ramona Faust's email below for accuracy and provide at least a partial response by end of day? By partial I mean if you require more time to respond just let me know.

Thanks s.15,s.19

-----Original Message-----

From: s.15,s.19 AGRI:EX  
Sent: Thursday, February 1, 2018 9:19 AM  
To: s.15,s.19 PSSG:EX  
Cc: s.15,s.19 AGRI:EX  
Subject: RE: Cannabis Secretariat follow-up

Hi s.15,s.19

I am going to need to consult with a few of my colleagues on this situation. As well, I think this is an excellent example to discuss with Health Canada. I'm not sure about the "home on ALR not being eligible for a licence" There may be some proximity requirement I'm not sure. The regulatory requirements for micro producers hasn't been determined as of yet. The piece I am doubtful about is the rolling over of licences. My understanding is that a person who has a designated producer licence could continue as a designated producer but if they wanted to expand their

operation or switch to a micro cultivation licence or standard cultivation licence they would need to meet all the requirements of that licence. In addition, the proposed regs suggest that the "medical access framework would allow for the federal government to refuse designated production if there were reasonable grounds to believe that it would create a risk to public health and safety".

From what I understood at our last meeting with Health Canada, when we discussed water usage, there would be a requirement for licence applicants to demonstrate access to adequate water supply. Whether or not a shared domestic water system would meet this requirement I'm not sure.

There are many overlapping components to this inquiry. It may take me awhile to compile a response.

I will follow-up again at end of day.

Thanks, s.15,s.1  
9

-----Original Message-----

From: s.15,s.19 PSSG:EX  
Sent: Wednesday, January 31, 2018 4:31 PM  
To: s.15,s.19 AGRI:EX  
Subject: FW: Cannabis Secretariat follow-up

Hi s.15,s.19

I understand you've been working with the Cannabis Secretariat Policy team on ALR issues. s.15,s.19  
s.15,s.19 presented at the Union of BC Municipalities Electoral Area Directors meeting yesterday and received a question regarding cannabis production facilities on ALR land.

I'm hoping you may be able to provide some context/clarification around the concerns the EA Director has outlined below. Any info you can provide is appreciated. Please give me call if you have any questions.

Thanks!

s.15,s.19

Cannabis Legalization and Regulation Secretariat Policing and  
Security Branch | Ministry of Public Safety & Solicitor General  
Direct: s.15,s.19

-----Original Message-----

From: Ramona Faust [mailto:RFaust@rdck.bc.ca]  
Sent: Wednesday, January 31, 2018 3:25 PM  
To: s.15,s.19, \_\_\_\_\_, PSSG:EX  
Subject: Re: Cannabis Secretariat follow-up

Dear s.15,s.19

Thank you so much for contacting me.

I represent a rural area adjacent to the City of Nelson in the Regional District of Central Kootenay The area is unzoned and has a Official Community Plan in the eastern portion of the electoral area.

There is a fair amount of land in the Agricultural land reserve throughout Area E.

The issue is as follows

1. the medical marijuana licenses have had two or three iterations.

The first program MMAR did not allow local government or police notification or provide any rigour.

Those licenses still exist but cant be moved or volume increased and I have been told license holders can migrate them into a new license format. This license was easily attainable and legitimized many Mom and Pop growers and also a underground unregulated sharing economy with unauthorized buildings. One such facility burnt in my area taking the life of a young man. These are still very prevalent on ALR and Rural Residential land. The second iteration AMMR? was a more rigorous program and excluded Mom and Pop growers by virtue of the rigour and cost of investment required. Also given most ALR land has a home and is not eligible for consideration to be licensed under the Ministers Bylaw Guidance Document and Health Canada.

In the RDCK Area E most specifically we have had applications for building permits indoor intensive agriculture on ALR land with a home on the property and in an area with households on either side. It is a shared domestic water system. The proponent has told neighbours it will be a licensed marijuana facility. Currently it would be impossible for this facility to be licensed because of residential proximity.

Because the buildings are deemed farm buildings there are no provisions for ensuring a livable distance from neighbouring homes, property lines no requirement for screening fencing nor odour control and the water for other small mixed farms are in question on this unincorporated water system.

s.22

The buildings will be 50 feet or less from the neighbour's farmhouse, home to two young girls and a family farm with two seniors on the other side.

Staff have said there are 16 such facilities looking for building permits in the RDCK all with different circumstances and not all on ALR land and likely waiting to migrate old licenses but without new regulations applied.

This is a very dynamic situation but the propensity to use the "farm building" category on ALR land with residences gives way to locating recreational marijuana facilities in agricultural residential neighbourhoods without the rigours of those engaged in AMMR

The Ministers 2014 Bylaw Guidebook for Medical Marijuana made provision on page 16 and 17 for development permits for MM and RM on agricultural land I have asked staff to develop this tool in the area covered by an OCP in Area E.

The ALC had cautioned me that we shouldn't be looking to prevent the establishment of licensed facilities so I am concerned their acceptance of these tools may be in question.

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I look forward to a society where it is just a preference and not a crime.

Thank you for your interest.

Ramona Faust  
Director RDCK Area E

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From s.15,s.19 PSSG:EX s.15,s.19

Date: 2018-01-31 9:40 AM (GMT-08:00)

To: Ramona Faust <RFaust@rdck.bc.ca>

Subject: Cannabis Secretariat follow-up

Hi Ramona,

Thank you for attending s.15,s.19 presentation on Cannabis Regulation in BC yesterday afternoon. As

discussed, I'm following-up on your question regarding cannabis production facilities on ALR land. You mentioned the province's Farm Practices Protection (Right to Farm) Act and spoke about medical cannabis facilities currently in operation.

Are you able outline your questions, or provide more information about your specific concerns? Bullet form is fine.

Thank you again for taking the time to bring your concerns to our attention. I look forward to hearing from you.

s.15,s.19

Cannabis Legalization and Regulation Secretariat Policing and  
Security Branch | Ministry of Public Safety & Solicitor General  
Direct: s.15,s.19

**From:** s.15,s.19 PSSG:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis Secretariat follow-up  
**Date:** Thursday, February 1, 2018 10:17:06

---

Hi s.15,s.  
10

Do you mean at issues that come up at stakeholder meetings/presentations? If so, a lot of what is discussed is around the priority policy issues and providing clarification s.13 We anticipate going forward (after the priority decisions have been made) more secondary policy issues being raised.

We do flag any issues that come up with the ministry responsible or policy lead on our team on an ongoing basis. Does this answer your question?

s.15,s.19

-----Original Message-----

From: s.15,s.19 AGRI:EX  
Sent: Thursday, February 1, 2018 10:02 AM  
To: s.15,s.19 PSSG:EX  
Subject: RE: Cannabis Secretariat follow-up

Thanks s.15,s.1 That was as I expected.  
a

Just out of curiosity, are you able to flag issues by topic? I'd be interested to know how many of these issues are being brought forward as well hearing the nuances of the different issues helps to inform our policies. So thank-you again for forwarding.

s.15,s.19

-----Original Message-----

From: s.15,s.19, PSSG:EX  
Sent: Thursday, February 1, 2018 10:00 AM  
To: s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX  
Subject: RE: Cannabis Secretariat follow-up

Hi,

This isn't a top priority. The question came up at a meeting and we're looking for clarity and to confirm the issues raised are on the provincial radar. I don't anticipate needing to provide a detailed response, we just want to ensure the right people are aware when these types of issues are raised.

s.15,s. No worries If you're not able to connect back today. As discussions around this do move forward, please let me know. I'll connect back if I get any more info/clarification on my end.

Thanks!

s.15,s.19

Cannabis Legalization and Regulation Secretariat Policing and  
Security Branch | Ministry of Public Safety & Solicitor General  
Direct: s.15,s.19

-----Original Message-----

From: s.15,s.19 AGRI:EX  
Sent: Thursday, February 1, 2018 9:46 AM  
To: s.15,s.19 AGRI:EX;s.15,s.19 PSSG:EX  
Subject: RE: Cannabis Secretariat follow-up

Hi s.15,s.19

Just flagging that with your current urgent priorities, you'll need time to work with your ministry working group on these questions. Maybe s.15,s.19 can give you a time she needs this information by? That would help.

Thanks,  
s.15,s.19

Corporate Governance, Policy & Legislation Branch BC Ministry of Agriculture s.15,s.19  
s.15,s.19

-----Original Message-----

From: s.15,s.19 AGRI:EX  
Sent: Thursday, February 1, 2018 9:19 AM  
To: s.15,s.19 PSSG:EX  
Cc: s.15,s.19 AGRI:EX  
Subject: RE: Cannabis Secretariat follow-up

Hi s.15,s.19

I am going to need to consult with a few of my colleagues on this situation. As well, I think this is an excellent example to discuss with Health Canada. I'm not sure about the "home on ALR not being eligible for a licence" There may be some proximity requirement I'm not sure. The regulatory requirements for micro producers hasn't been determined as of yet. The piece I am doubtful about is the rolling over of licences. My understanding is that a person who has a designated producer licence could continue as a designated producer but if they wanted to expand their operation or switch to a micro cultivation licence or standard cultivation licence they would need to meet all the requirements of that licence. In addition, the proposed regs suggest that the "medical access framework would allow for the federal government to refuse designated production if there were reasonable grounds to believe that it would create a risk to public health and safety".

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There are many overlapping components to this inquiry. It may take me awhile to compile a response.

I will follow-up again at end of day.

Thanks, s.15,s.19  
s.15,s.19

-----Original Message-----

From: s.15,s.19 PSSG:EX  
Sent: Wednesday, January 31, 2018 4:31 PM  
To: s.15,s.19 AGRI:EX  
Subject: FW: Cannabis Secretariat follow-up

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s.15,s.19



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s.15,s.19 presented at the Union of BC Municipalities Electoral Area Directors meeting yesterday and received a question regarding cannabis production facilities on ALR land.

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Thanks!

s.15,s.19

Cannabis Legalization and Regulation Secretariat Policing and  
Security Branch | Ministry of Public Safety & Solicitor General  
Direct: s.15,s.19

-----Original Message-----

From: Ramona Faust [mailto:RFaust@rdck.bc.ca]  
Sent: Wednesday, January 31, 2018 3:25 PM  
To: s.15,s.19 PSSG:EX  
Subject: Re: Cannabis Secretariat follow-up

Dear s.15,s.19

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s.22

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Thank you for your interest.

Ramona Faust  
Director RDCK Area E

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: s.15,s.19 "PSSG:EX" s.15,s.19

Date: 2018-01-31 9:40 AM (GMT-08:00)

To: Ramona Faust <RFaust@rdck.bc.ca>

Subject: Cannabis Secretariat follow-up

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s.15,s.19

Cannabis Legalization and Regulation Secretariat Policing and  
Security Branch | Ministry of Public Safety & Solicitor General  
Direct: s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis session for field staff  
**Date:** Tuesday, December 19, 2017 16:28:30

---

Hi s.15,s.1

Thanks for the quick reply. Good to hear that you can answer most of the questions. Yes, I expected the proposed Cannabis Act document would not be too helpful. Are you in tomorrow? I don't have any meetings scheduled, thus can talk whenever you are available.

Regards,  
s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, December 19, 2017 4:20 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis session for field staff

Hi s.15,s

As the questions listed below were not indicated in the proposed regulations, a review of the regulations would not address them. However as I attended the consultations with Health Canada on Thursday and Friday last week, I am able to answer the majority of these questions. Questions that I am currently unable to answer I may be able to source the answers from Health Canada. It became clear at last week's meetings that some of these questions will fall to the province. In addition I did have a discussion with a Health Canada inspector at the consultation who was willing to engage in further discussions with our industry specialists and regional agrologists.

s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, December 19, 2017 2:25 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis session for field staff

Hi s.15,s

I finally read over the material s.1 provided on the feedback from the Regional Agrologists on the

s.13

s.13

Regards,  
s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, December 12, 2017 4:33 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis session for field staff  
Hi s.15,

I spoke with s.15,s.19 the other day as you are aware and it began my thinking on this issue. I wonder perhaps if one place to start is ls.13  
s.13

the province is facing which may impact field staff. These two components may provide answers to some callers' inquiries.

s.15,s.

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, December 12, 2017 4:26 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis session for field staff

Thanks, s.15,s.19 suggested RAs, ISs and BRM. It would not be a face-to-face. I suspect it would be a Lync meeting...with conference call? Yes, s.15,s.19 envisioned more than one call/meeting.

I think it would be a good opportunity for everyone participating to share information. I suspect RAs are getting questions now and this will likely increase in the future with the legalization of non-medical cannabis. Do the RAs have the information they need to answer the questions?

I will take a look at the document you sent.

Regards,  
s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, December 12, 2017 3:52 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX

**Subject:** RE: Cannabis session for field staff

Hi s.15,s.19 I have a few questions. Who would be invited to this meeting? Is it going to be a conference call or are s.15,s.19 thinking about a face to face? January is not the best time for RA's as we are knee deep in growers meetings plus if it was determined to be a face to face I would not want to travel from up north or even Kelowna for that matter in January.

A conference call might not be a bad idea? This could be the first in a series of calls to help staff in the field get up to speed on what this industry might look like come July. The calls could focus on what we know so far, guests could be invited from the federal government, provincial government and the industry.

I polled staff for input on the draft regulations which I have attached. I think it gives some insight into the topics that RA's feel are of concern with respect to the legalization of cannabis.

s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, December 11, 2017 11:09 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Cannabis session for field staff  
Hi s.15,s.19

s.15,s.19 suggested to s.15,s.19 in late November the need for a cannabis session for field staff s.15,s.19 both support the session and s.15,s.19 has asked me to prepare a draft agenda. s.15,s.19 would like the session to be held in January, which probably isn't ideal since the entire system will change in July. Nevertheless, it probably would be good to have a conversation about cannabis now. I would like to keep the formal presentations to 30-40 minutes. That will leave 20-30 minutes for discussion. Topics??? A few possible broad topics are listed below. I would like your thoughts on the list...what are the key topics to cover now? s.15,s.19 are there other issues regional staff are dealing with on cannabis?

s.13

Regards,

s.15,s.19

**From:** s.15.s.19 AGRI:EX  
**To:** s.15.s.19 AGRI:EX  
**Cc:** s.15.s.19 AGRI:EX  
**Subject:** RE: Cannabis stats  
**Date:** Wednesday, February 14, 2018 14:33:52

I don't have any data on energy use by cannabis operations in BC. I do have some figures on sector expansion and the types of operations being built. Most of the new production area in BC is greenhouses. I am aware of several operations that have reported to be expanding their production:

- Aphria (formerly Broken Coast on Vancouver Island) is expanding their operation by 60,000 sq ft; the initial production facility was an indoor operation but I don't know whether that is the case for the expansion.
- Evergreen Medicinal Supply has reported their plans to build a 180,000 sq ft greenhouse in Saanich.
- Sunniva is to begin construction this spring on a 700,000 sq ft greenhouse in Oliver.
- Tweed BC is retrofitting a 1,300,000 sq ft greenhouse in Aldergrove.
- Village Farms is in the process of retrofitting an existing 1,100,000 sq ft greenhouse in Delta.
- Whistler Medical Marijuana Corp is working on a 65,000 sq ft expansion at their facility in Pemberton; unsure whether a bunker or greenhouse.

Thus, there is 3,280,000 sq ft (75 acres) of greenhouses being built/retrofitted for cannabis in BC plus an additional 125,000 sq ft of indoor or greenhouse production area.

When talking about energy use by the cannabis sector, it is very important to differentiate indoor from greenhouse production. I have been told that greenhouse production will reduce electricity use by 90% relative to indoor operations. Indoor operations have high electricity demand because they rely 100% on supplemental lighting and HVAC to manage the indoor climate (temperature and humidity).

s.15.s.19

**From:** s.15.s.19 AGRI:EX  
**Sent:** Wednesday, February 14, 2018 1:52 PM  
**To:** s.15.s.19 AGRI:EX  
**Cc:** s.15.s.19 AGRI:EX; s.15.s.19 AGRI:EX  
**Subject:** RE: Cannabis stats

Hi s.15.s.19 - I note that this would be related to cost of production and calculated by Statistics Canada as an input. Right now they are still in the planning stages of collecting data for the medical cannabis sector (with a plan for future expansion into the legalized cannabis sector in a couple of years). I found this current statement on the Statistics Canada site:

Statistics Canada is conducting a pilot survey of this group of producers (medical cannabis) that will provide information about their dollar sales, expenses, profits, investments and product lines. Statistics pertaining to the production, distribution and consumption of medical cannabis will be both complete and of high quality.

I've investigated the survey at: [http://www23.statcan.gc.ca/imdb/p3instr.pl?Function=assembleInstr&lang=en&Item\\_Id=396039](http://www23.statcan.gc.ca/imdb/p3instr.pl?Function=assembleInstr&lang=en&Item_Id=396039) and it will collect two key pieces of information that will be helpful but not provide the exact information BC Hydro is wanting...

- In 2016, what was the active medical cannabis cultivation area and unused potential cultivation area for each of the locations identified above?
- Energy (e.g., electricity, natural gas, heat, oil, etc.) and water expenses
  - : Dollars (CAN \$)
  - : Percentage(%) related to medical cannabis

When looking at Statistics Canada survey results for other industries (e.g. aquaculture) it looks like this is as fine as the data will go (ie. No differentiation or details on type(s) of energy and their relative costs).

Also I found a report from a workshop in California that provided these statistics: Among cannabis cultivators, Xcel has seen power load estimates of 200 W/sq. ft., and the actual is closer to 35 W/sq. ft. 68 W/sq. ft. is about the highest density of lighting they see, and that is for flower areas. Flower areas require more lighting than other cultivation areas, such as the veg and clone areas, so the average is 35 W/sq. ft.

([http://www.cpuc.ca.gov/uploadedFiles/CPUC\\_Public\\_Website/Content/About\\_Us/Organization/Divisions/Policy\\_and\\_Planning/PPD\\_Work/PPD\\_Work\\_Products\\_\(2014\\_forward\)/PPD%20-%20Prop%2064%20Workshop%20Report%20FINAL.pdf](http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/About_Us/Organization/Divisions/Policy_and_Planning/PPD_Work/PPD_Work_Products_(2014_forward)/PPD%20-%20Prop%2064%20Workshop%20Report%20FINAL.pdf))

As I don't have any idea of the size(s) of facilities proposed for BC I can't do any further estimates on projected energy demand. I've cc'd s.15.s.19 on this as well in case he has some additional insights and/or data.

Cheers,

s.15.s.1

**From:** s.15.s.1 AGRI:EX  
**Sent:** Wednesday, February 14, 2018 1:22 PM  
**To:** s.15.s.19 AGRI:EX  
**Cc:** s.15.s.19 AGRI:EX  
**Subject:** Cannabis stats

Hi s.15.s.19,

Could forward me any links to cannabis stats that you have readily available?

s.15.s.19 has requested some data on behalf of BC Hydro as they are trying to project load forecasting. I don't think there is anything like this available at this time.

Thanks, s.15.s.19

s.15.s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15.s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Cannabis transition paper  
**Date:** Wednesday, May 3, 2017 13:47:43  
**Attachments:** s.13

---

s.15,s.19

Hi

I made the decision to go back to the diagram structure that s.15,s.19 and I discussed and what we think the DM would like to see.

It needs more information, which I think you can easily insert, but I think you can see the value in organizing the information this way.

s.13

s.15,s.19 please check quickly and provide feedback to make sure the table is on the right track for now.

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, May 3, 2017 1:12 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** Cannabis transition paper

Hi s.15,s.19

I inserted the chart, very high level. I highlighted in red the differences between the two.

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: cannabis update  
**Date:** Wednesday, November 15, 2017 11:11:36

---

Thanks s.15, .

I did reach out to s.15,s.19 on the need to get on with the AGRI policy issues. My understanding was that he would have an ADM call, but he seemed to indicate that this would happen with the secretariat (ie your level).

Can you let me know if we're not getting traction. I think we need to get to Cabinet soon on this a it will start playing out at the FPT AGRI meetings in the new year.

s.15,s.19

*Ministry of Agriculture*

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, November 15, 2017 11:05 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** cannabis update  
s.15,s.19

Had a quick call with s.15,s.19 from Cannabis Secretariat.

She identified the three cab subs have been approved by cabinet:

s.12,s.13

s.15,s.19 indicated that there is no interest at this point in exploring equity for cannabis as wineries and breweries have regarding tasting rooms, as part of the retail submission. There will be decisions that will have to be made on colocation, etc.

The federal government will be coming mid – December to facilitate consultations on the Gazette of the proposed federal regulations. There is an opportunity to meet with the federal government on micro cultivation licenses (outdoor production) and the implications. This is due to BC's request to explore the size of our sector. No other province has expressed this type of interest to date.

I have asked s.15,s.19 to invite AGRI to meeting. She has agreed.

Let me know if any questions. Also if anyone has anything to add from call, please feel free.

s.15,s.19

Corporate Governance, Policy and Legislation

Ministry of Agriculture

s.15,s.19



**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: cannabis  
**Date:** Tuesday, June 20, 2017 10:07:46

---

Hi s.15,s. : Our phone lines are down, I will try to call later? The document is a little hard to follow so here is my attempt:

Comment ULJ 22: The complaints most often first point of contact is to the local government bylaw enforcement. These are referred to the provincial government depending on the nature of the complaint and if they are on ALR land. If the complaint is pollution, air or water, it goes to the Ministry of Environment compliance and enforcement. If it is regarding the ALR it goes to the RA in the area and also compliance and enforcement at the ALC.

Comment ULJ 21: It is both

Comment ULJ 24: The complaint I received was for odour on the ALR. As there are no normal farm practices or any prior cases I was recommended by the Land Use Planners to refer the complaint to FIRB. The complainants left their name and contact information which was entered into the Ministry Concerns and Complaints tracking system. The complainant did contact FIRB but did not file a formal complaint. There was no further action taken.

There were two other complaints related to deposition of fill for the purposes of farming. In both cases those were reported to local governments which went through the appropriate review process involving the Agricultural Advisory Committee. The local government has referred the files to the Agricultural land Commission compliance and enforcement, which in one case, has requested a remediation plan.

Comment ULJ17: Generally it is the size of the operation footprint on the ALR. One producer is permitted to produce for 5 clients under the MMR; however there does not appear to be a size limitation, percent of lot cover or square foot. Some of these buildings would be similar to a medium sized poultry operation in terms of footprint on the parcel.

Let me know if you have questions:  
s.15,s.19

**From:** s.15,s.19 [mailto:s.15,s.19@gov.bc.ca]  
**Sent:** Friday, June 16, 2017 1:33 PM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** cannabis

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: CAP Eligibility - Cannabis  
**Date:** Thursday, March 8, 2018 15:50:20

---

You are welcome! I'm sure the PTs will delete ☺

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, March 8, 2018 2:54 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: CAP Eligibility - Cannabis  
Thanks s.15,s.19

Sorry for the duplication.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, March 8, 2018 12:37 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** FW: CAP Eligibility - Cannabis  
Newfoundland response

---

**From:** MacDonald, Cindy [<mailto:cindymacdonald@gov.nl.ca>]  
**Sent:** Thursday, March 8, 2018 12:06 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** Gill, Janice  
**Subject:** RE: CAP Eligibility - Cannabis  
Hi s.15,s.19

At this point Newfoundland and Labrador will not be including cannabis as an eligible commodity for CAP designated programs.

Cindy

Cynthia MacDonald, B.Sc. Agr.

Director of Agriculture Business Development

Department of Fisheries and Land Resources

P.O. Box 2006

Corner Brook, NL, A2H 6J8

Telephone 709-637-2077

Fax 709-637-2589

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**From:** s.15,s.19 AGRI:EX [<mailto:s.15,s.19@gov.bc.ca>]  
**Sent:** Thursday, March 8, 2018 2:50 PM  
**To:** 'Lesiuk, Mike (AGR)' <[Mike.Lesiuk@gov.mb.ca](mailto:Mike.Lesiuk@gov.mb.ca)>; 'Bourgeois, Ryan (DAAF/MAAP)' <[Ryan.Bourgeois@gnb.ca](mailto:Ryan.Bourgeois@gnb.ca)>; MacDonald, Cindy <[cindymacdonald@gov.nl.ca](mailto:cindymacdonald@gov.nl.ca)>; 'Alexandra Poirier' <[alexandra.poire@mapaq.gouv.qc.ca](mailto:alexandra.poire@mapaq.gouv.qc.ca)>; 'Amy Rutgers Kelly' <[Amy.Rutgers-Kelly@ontario.ca](mailto:Amy.Rutgers-Kelly@ontario.ca)>; 'Basia Florio' <[Basia.florio@ontario.ca](mailto:Basia.florio@ontario.ca)>; 'Bobby Cameron' <[bcameron@gov.pe.ca](mailto:bcameron@gov.pe.ca)>; 'Brenda McKay' <[brendan.mckay@ontario.ca](mailto:brendan.mckay@ontario.ca)>; 'Carla (New)' <[clmillar@gov.pe.ca](mailto:clmillar@gov.pe.ca)>; 'cmmorrison@gov.pe.ca' <[cmmorrison@gov.pe.ca](mailto:cmmorrison@gov.pe.ca)>; 'Darren Chase' <[Darren.Chase@gov.ab.ca](mailto:Darren.Chase@gov.ab.ca)>; 'David Loewen' <[david.loewen@gov.sk.ca](mailto:david.loewen@gov.sk.ca)>; 'Ernest Walker' <[ernest.walker@novascotia.ca](mailto:ernest.walker@novascotia.ca)>; 'Laureen Kennedy' <[Laureen.Kennedy@gov.ab.ca](mailto:Laureen.Kennedy@gov.ab.ca)>; 'Mathhew Ball' <[matthew.ball@gov.yk.ca](mailto:matthew.ball@gov.yk.ca)>; 'Sarah-Sophie Julien' <[Sarah-Sophie.Julien@mapaq.gouv.qc.ca](mailto:Sarah-Sophie.Julien@mapaq.gouv.qc.ca)>; 'Wendy McCormick' <[wendy.mccormick@gov.ab.ca](mailto:wendy.mccormick@gov.ab.ca)>  
**Cc:** 'Carnegie, Wendy (AGR)' <[Wendy.Carnegie@gov.mb.ca](mailto:Wendy.Carnegie@gov.mb.ca)>; 'Arrus, Katia (AGR)' <[Katia.Arrus@gov.mb.ca](mailto:Katia.Arrus@gov.mb.ca)>; 'Lalla, Mike (AGR)' <[Mike.Lalla@gov.mb.ca](mailto:Mike.Lalla@gov.mb.ca)>  
**Subject:** CAP Eligibility - Cannabis

Hello all,

We are wondering the status of other PTs decision making related to cannabis eligibility under CAP designated programs, especially after the FPT DM Retreat. To date, BC has not made any decisions in these areas.

The questions are:

- Have you made a decision to include, exclude or selectively restrict eligibility of recreational cannabis in CAP designated programs?
- If you have made a decision to include, what types of designated programs are eligible?
- Will hemp receive a renewed or increased focus, if so in what areas?
- Are you aware of any plans related to cannabis in BRM and/or other insurance-type products that are offered?

s.12,s.13

Thanks in advance,

s.15,s.19

Corporate Governance, Policy & Legislation Branch  
Ministry of Agriculture  
Government of British Columbia

s.15,s.19

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**From:** s.15,s.19 : AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Re: Cascadia/ Cannabis  
**Date:** Wednesday, May 16, 2018 06:16:16

---

s.15,s.19 did a jurisdictional scan to find out what other jurisdictions are doing with regard to cannabis which isn't straightforward because not many have anything akin to the ALR. There is no legislation to scan as it hasn't been legalized yet.

Sent from my BlackBerry 10 smartphone on the TELUS network.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, May 16, 2018 4:58 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Fwd: Cascadia/ Cannabis

---

s.15,s.19 . Was there a jurisdictional scan of legislation completed?

Sent from my iPhone

Begin forwarded message:

**From:** s.15,s.19 AGRI:EX" s.15,s.19 @gov.bc.ca>  
**Date:** May 15, 2018 at 11:50:34 PM PDT  
**To:** s.15,s.19 AGRI:EX" s.15,s.19 @gov.bc.ca>  
**Cc:** s.15,s.19 JTT:EX" <s.15,s.19 @gov.bc.ca>  
**Subject:** Cascadia/ Cannabis

Hi s.15,s.19  
s.15,s.19 is Putting together an inventory of government wide initiatives considered "Cascadia". We have responded but s.1 is wondering whether there was any cross border work on Cannabis legalization. Am think "no" but wanted to check.  
Regards  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** RE: Consultation questions for cannabis greenhouses  
**Date:** Friday, June 8, 2018 10:38:39  
**Attachments:** Consultation Questions for Cannabis Greenhouses - DW answers.docx

---

Hi s.15,s.19

My responses to the questions are attached.

s.15,s.19

---

From: s.15,s.19 AGRI:EX  
Sent: Tuesday, June 5, 2018 4:55 PM  
To: s.15,s.19 AGRI:EX  
Subject: Consultation questions for cannabis greenhouses  
Hi s.15,s.1

As discussed today, I have attached the consultation questions. Can you please attempt to answer the questions within?

Thanks, s.15,s.1

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 GRI:EX  
**To:** s.15,s.19 ^GRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Decision documents  
**Date:** Thursday, May 24, 2018 08:13:35

---

Hi s.15,s.19 -

s.13

Good eye.

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, May 23, 2018 4:35 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** FW: Decision documents

FYI: The Secretariat has drafted our e.g. as fact in this DN for SG and AG. s.13

s.13

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, May 11, 2018 11:54 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** FW: Decision documents

Can you take a look and get back to me?

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Friday, May 11, 2018 11:49 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 PSSG:EX  
**Subject:** Decision documents

His.15,s.1 – Further to our conversation last night, I put together the attached notes to support taking the AGRI decisions to a joint AG/SG meeting. The first would be used at the meeting in addition to your two BNs. The second would go to the SG and AG after the meeting (assuming support for the recommended options) to document their support; it assumes prior sign-off of your BNs by s.15,s.19 s.15,s.19

If you are satisfied that these notes accurately capture your recommendations (and subject to approvals on our end), and once s.15,s.19 has approved your BNs, we can arrange for this

to go on the agenda for a joint SG/AG meeting.

Please let me know if you have any questions or concerns.

Thank you,  
s.15,s.1  
9

s.15,s.19

Cannabis Legislation and Regulation | Policing and Security Branch  
Ministry of Public Safety and Solicitor General | Cell: s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Decision documents  
**Date:** Monday, May 14, 2018 09:44:14

---

Hi s.15,s.19 -

Thanks again for such kind words this morning! And congratulations on this excellent result – the culmination of so much work ☺

The attached documents look just fine to me and seem like accurate, concise captures of the decisions.

Thanks,  
s.15,s.19  
9

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, May 14, 2018 9:19 AM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** FW: Decision documents

The attached looks good to me. Can you take a quick look?

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, May 11, 2018 11:54 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** FW: Decision documents

Can you take a look and get back to me?

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Friday, May 11, 2018 11:49 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 PSSG:EX  
**Subject:** Decision documents

Hi s.15,s.19 – Further to our conversation last night, I put together the attached notes to support taking the AGRI decisions to a joint AG/SG meeting. The first would be used at the meeting in addition to your two BNs. The second would go to the SG and AG after the meeting (assuming support for the recommended options) to document their support; it assumes prior sign-off of your BNs by s.15,s.19 s.15,s.19

If you are satisfied that these notes accurately capture your recommendations (and subject to approvals on our end), and once s.15,s.19 has approved your BNs, we can arrange for this to go on the agenda for a joint SG/AG meeting.

Please let me know if you have any questions or concerns.



Thank you,  
s.15,s.19

Ministry of Public Safety and Solicitor General | Cell: s.15,s.19 | Policing and Security Branch

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Decision documents  
**Date:** Thursday, May 24, 2018 08:14:01

---

Excellent! Well done ☺ Gold star, s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, May 23, 2018 5:01 PM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** FW: Decision documents

Hi s.15,s.19

I spoke with s.15,s.19 and requested that the language for the option in the DRAFT DN be less prescriptive and more reflective of the DN that s.15,s.19 signed. This will provide us with the s.13

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, May 11, 2018 11:54 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX  
**Subject:** FW: Decision documents

Can you take a look and get back to me?

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Friday, May 11, 2018 11:49 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 PSSG:EX  
**Subject:** Decision documents

Hi s.15,s.19 - Further to our conversation last night, I put together the attached notes to support taking the AGRI decisions to a joint AG/SG meeting. The first would be used at the meeting in addition to your two BNs. The second would go to the SG and AG after the meeting (assuming support for the recommended options) to document their support; it assumes prior sign-off of your BNs by s.15,s.19 s.15,s.19

If you are satisfied that these notes accurately capture your recommendations (and subject to approvals on our end), and once s.15,s.19 has approved your BNs, we can arrange for this to go on the agenda for a joint SG/AG meeting.

Please let me know if you have any questions or concerns.

Thank you.  
s.15,s.19



**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** s.12,s.13  
**Date:** Thursday, March 22, 2018 18:14:22  
**Attachments:** s.12,s.13

---

Hi s.15,s.19

Here are comments from the team and myself<sup>s.15,s.1</sup> and I are happy to discuss.

Regards

s.15,s.1

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, March 22, 2018 11:11 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: s.12,s.13  
s.15,s.1 s.12,s.13  
s.12,s.13

Thanks

s.15,s.19

Ministry of Agriculture  
s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, March 22, 2018 9:31 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: s.12,s.13

s.12,s.13

s.12,s.13

**From:** s.15,s.19 AGRI:EX

**Sent:** Wednesday, March 21, 2018 4:51 PM

**To:** s.15,s.19 AGRI:EX s.15,s.19

**Cc:** s.15,s.19 AGRI:EX AGRI:EX: s.15,s.19 AGRI:EX

**Subject:** s.12,s.13

Hi s.15, – I've reviewed s.15,s. ; note which had support from s.15,s.19 . It's a great note. A question for you:s.12,s.13

s.12,s.13

Thanks – great work,s.15,s.19  
s.15,s.19

**From:** s.15,s.19 [AGRI:EX](#)  
**To:** s.15,s.19 [AGRI:EX](#); s.15,s.19 [AGRI:EX](#)  
**Cc:** s.15,s.19 [AGRI:EX](#); [AGRI:EX](#)  
**Subject:** s.12,s.13  
**Date:** Thursday, March 22, 2018 09:31:30

---

s.12,s.13

s.12,s.13

---

**From:** s.15,s.19 AGRI:EX

**Sent:** Wednesday, March 21, 2018 4:51 PM

**To:** s.15,s.19 AGRI:EX

**Cc:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX

**Subject:** s.12,s.13

Hi s.15,s.19 – I've reviewed s.15,s.1 note which had support from s.15,s.19 It's a great  
note. A question for you s.12,s.13

s.12,s.13

Thanks – great work, s.15,s.19

s.15,s.1

a

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Re: Direction on the cannabis cab sub  
**Date:** Tuesday, February 20, 2018 17:26:20

---

Thanks s.15,s.1 - that's really helpful. I appreciate being in the loop. I know this file requires a lot of hard work, thank you.

Sent from my iPhone

On Feb 20, 2018, at 5:11 PM, s.15,s.19 AGRI:EX <s.15,s.19@[gov.bc.ca](mailto:gov.bc.ca)> wrote:

Hi s.15,s.19

Just wanted to give you the highlights of our discussion with s.15,s.19 today.  
s.12,s.13 s.15,s.19 to

brief s.15,s.19 and to take to the DM committee.

I will be trying to get a first draft of the PPT to s.15,s.19 on Friday or early next week.  
s.12,s.13

This is an overview of what I heard at the meeting. If anyone had a different interpretation of what was being asked for please let me know.

Thanks, s.15,s.19  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19



**From:** Ferraro, Kevin (OMAFRA)  
**To:** s.15,s.19 >AGRI:EX s.15  
**Subject:** RE: Discussion between BC AGRI and OMAFRA, Teleconference: 1-877-353-9184, Con ID:  
**Date:** Wednesday, September 20, 2017 09:02:11

---

Thanks.

FYI I am anticipating other OMAFRA folks on the call being:

John Turvey

Laurie Adrien

Robert Jaworski

Sarah Elliott

---

**From:** s.15,s.19 AGRI:EX [mailto:s.15,s.19@gov.bc.ca]  
**Sent:** Wednesday, September 20, 2017 12:00 PM  
**To:** Ferraro, Kevin (OMAFRA)  
**Subject:** RE: Discussion between BC AGRI and OMAFRA, Teleconference: 1-877-353-9184, Con ID: s.15

Hi Kevin,

No problem, the agenda is just a guide. We can just talk high level.

s.15,s.

---

**From:** Ferraro, Kevin (OMAFRA) [mailto:Kevin.Ferraro@ontario.ca]  
**Sent:** Wednesday, September 20, 2017 8:56 AM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Discussion between BC AGRI and OMAFRA, Teleconference: 1-877-353-9184, Con ID s.15

I just found your email in my junk folder. Sorry about that. I will share now with the group but they will likely not have prepared to respond directly to the document.

Apologies

Kevin

---

**From:** s.15,s.19 AGRI:EX [mailto:s.15,s.19@gov.bc.ca]  
**Sent:** Wednesday, September 20, 2017 11:52 AM  
**To:** Ferraro, Kevin (OMAFRA)  
**Subject:** FW: Discussion between BC AGRI and OMAFRA, Teleconference: 1-877-353-9184, Con ID: s.15

Hi Kevin,

The conference number is in the subject bar of the email I sent you and your colleagues with the Agenda.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, September 18, 2017 3:13 PM  
**To:** 'Ferraro, Kevin (OMAFRA)'; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** Discussion between BC AGRI and OMAFRA, Teleconference: 1-877-353-9184, Con ID s.15

Hi Kevin,

I've attached an agenda to guide our discussion for Wednesday.

Below is the teleconferencing information:

**Dial-in Phone Number:**

**1-877-353-9184**

**Participant Conference ID:** s.15

Thanks again. ^  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 PSSG:EX  
**To:** s.15,s.19 IDR:EX; s.15,s.19 LDB:EX; s.15,s.19 MCF:EX; s.15,s.19 AGRI:EX; s.15,s.19  
HLTH:EX; s.15,s.19 JTT:EX; s.15,s.19 IRR:EX; s.15,s.19 HLTH:EX; s.15,s.19 LCLB:EX;  
s.15,s.19 LCLB:EX; s.15,s.19 MAH:EX  
**Cc:** s.15,s.19 PSSG:EX  
**Subject:** RE: Feb 14th Meeting with Health Canada  
**Date:** Thursday, February 15, 2018 16:51:57  
**Attachments:** [Federal Regulation Questions.docx](#)

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Hi everyone,

I've attached a revised list of questions with the responses we received from the federal government yesterday. Thank you for your participation in the meeting.

s.15,s.  
19

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**From:** s.15,s.19 PSSG:EX  
**Sent:** Tuesday, February 13, 2018 2:40 PM  
**To:** s.15,s.19 PSSG:EX; s.15,s.19 PSSG:EX; s.15,s.19 PSSG:EX; s.15,s.19  
PSSG:EX; s.15,s.19 LDB:EX; s.15,s.19 LDB:EX; s.15,s.19 MCF:EX; s.15,s.19 AGRI:EX; s.15,s.  
s.15,s.19 JTT:EX; s.15,s.19 IRR:EX; s.15,s.19 HLTH:EX; s.15,s.19 LCLB:EX; 19  
s.15,s. LCLB:EX  
**Cc:** s.15,s.19 PSSG:EX  
**Subject:** Feb 14th Meeting with Health Canada

Hi everyone,

Attached is a list of questions that will be asked tomorrow during our call with representatives from Health Canada. Due to the large volume of questions that we received, we've had to shorten the list and merge some questions together in order accommodate the two-hour time limit.

Thanks,

s.15,s.  
19  
s.15,s.19

Cannabis Legalization and Regulation Secretariat  
Policing and Security Branch - Ministry of Public Safety and Solicitor General  
s.15,s.19

**From:** s.15.s.19 PSSG:EX  
**To:** s.15.s.19 AGR:EX  
**Subject:** RE: Federal regulation questions  
**Date:** Monday, January 22, 2018 14:24:00

---

H s.15.s.

Here are the questions that you submitted that I don't have an answer for yet. If you've got an answer that I missed, let me know and I'll add it in.

Thanks,

s.15.s.

---

Table 1, page 19: What is the rationale for a cap of THC levels in micro cultivation? Why is there no cap on THC levels for standard cultivation of non-medical cannabis and/or additional security requirements for producers and or processors of high THC product?

There is a lack of clarity on the policy intent of this requirement as proposed.

---

When will the list of authorized pesticides be available for provincial governments to review?

The requirement for mandatory pesticide testing should be revisited once the industry is more mature and more legal products are available; i.e. treat it like any other crop in its category with audit testing. This could take some time, since most major chemical companies are hesitant to register products on cannabis due to the more stringent and costly requirements, and due to the high value of the crop (high value = potential costly liability if something goes wrong, such as crop damage or lack of control).

---

What would be "reasonable measures to prevent the escape of odours and pollen" for cannabis indoors whether cultivated, dried, stored or processed?

---

Would any consideration be given to limit impact of odours of outdoor-grown cannabis (i.e. set-backs from property lines)?

---

Would prevention of odours apply equally to different levels of cultivation and processing related to the location (e.g. outdoor cultivation)?

---

What are the benefits and risks of reducing security requirements for micro-cultivation?

Cannabis is such a high-value crop that even a relatively small production area has a very high value. For instance, about \$0.5 million (retail value) worth of cannabis could be produced in a 1,000 sq. ft. production facility.

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How many samples would have to be tested per crop / batch?

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Are testing labs (or the producer) required to notify the Minister if a sample fails a pesticide etc. test?

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What is the process for reporting failed analytical tests?

---

How is the federal government proposing to monitor and enforce good production practices?

---

How will both provincial and federal regulations related to good production practices coordinate together in practice?

---

What role will provincial legislation and administrative tribunals play regarding farm practices nuisance complaints and local government bylaws?

---

Is the federal government anticipating having cannabis specific tribunals regarding these federal regulations and federally licenced production facilities?

---

Will the federal government be gathering scientific evidence with respect to production and good production practices that will be shared with the provinces?

---

The proposed regulations state, "for processing licenses, a quality assurance person must be employed. That person must have appropriate training, experience and technical knowledge". Would these training, knowledge and expertise requirements differ between standard and micro-processors?

---

Who would be responsible for monitoring record keeping and how (i.e. onsite or off-site)?

---

Will all of these products be classified as regular agriculture or food products?

---

Will considerations be made for additional labelling requirements for exported product?

---

How will the Food and Drug Act and the Cannabis Act work together for packaging and labelling?

---

What information related to non-medical cannabis licences does the federal government intend to share with provincial and territorial governments?

The federal government has claimed jurisdiction over production for both medical and non-medical cannabis and has relegated jurisdiction of distribution and retail of non-medical cannabis to the provinces while retaining jurisdiction over the distribution and sale of medical cannabis.

At the same time the federal government is allowing for operators to hold production licences for both medical and non-medical cannabis. As well, will allow vertical integration of licences (i.e. a producer can hold and processing licence and conduct both operations in the same location).

If provincial governments do not have access to information on medical cannabis licenced operations it

will be difficult to account for quantities of cannabis in the provincial retail and distribution chain, which would greatly increase opportunity for diversion of product to the black market.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, January 22, 2018 11:56 AM  
**To:** s.15,s.19 PSSG:EX  
**Subject:** RE: Federal regulation questions  
s.15,s.19

I heard some of the answers slightly differently than what you have here. Perhaps a phone call to discuss would be best?

s.15,s.1  
a

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**From:** s.15,s.19 PSSG:EX  
**Sent:** Monday, January 22, 2018 11:34 AM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** Federal regulation questions  
Hi s.15,s.1

You may have these answers already, seeing as how you were at the meetings with us in Vancouver. But, for my own confirmation purposes, here are the answers we have so far to the questions you submitted about the proposed federal regulations. If you've managed to answer any others please let me know so I can update my list. We're still working on setting up a meeting with HC to go over these.

Thanks,  
s.15,s.  
1a

Table 1, page 19: Would 3rd party service providers e.g. transportation company be covered by other's (e.g. the cultivator or processor) license?	s.13,s.16
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Needed to inform the provincial policy development on the distribution and retail system.

Will industrial hemp cultivation licence holders be able to hold a micro processing licence (e.g. processing CBD products)?

What does the requirement to notify local authorities include? Is granting of a federal licence dependent upon approval from local authorities? (i.e. proposed operation meets all provincial and municipal regulations and bylaws?)

Not clear what the policy intention is given there is a lack of information on what the notification includes and is intended to achieve. What is the outcome that is expected?

This information will assist in informing provincial policy on the role of local governments in decisions related to land use and cannabis in municipalities across the province, and whether there will be the ability to prohibit or restrict cannabis operations in BC.

To avoid that producers use the federal legislation to trump provincial legislation, production and processing operators should be in compliance with provincial land use and agricultural regulations.

Is there an expectation that other practice recommendations e.g. waste management will be put in place on national scale or established at provincial/local scale?

Since not all parts of the plant are utilized, what requirements would apply to the waste portion of these plants? Would it be burned, composted, baled or used in manufacturing for some other purpose? Can it be integrated into agricultural production systems without a licensing requirement?

Will there be a federal program in place to respond to complaints of all types of cultivation, including 'designated producer' sites? What will be the process for concerns expressed by those impacted from production practices (i.e. neighbourhood odour complaints)? What enforcement resources will be provided and how?

Would provincial staff who provide industry support require security clearances in order to enter licensed production and processing facilities e.g. Regional Agrologists?

Clarity on how the province will need to interact with these types of licensed operations requiring security clearance is required and would be very problematic if they are required for Provincial Regional Agrologists to inspect the operations in response to a nuisance complaint.

s.15,s.19

Cannabis Legalization and Regulation Secretariat  
 Policing and Security Branch - Ministry of Public Safety and Solicitor General  
 s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.19 AGRI:EX  
**Cc:** s.19 AGRI:EX  
**Subject:** RE: Follow up to the Federal Consultation on Regulations  
**Date:** Friday, January 5, 2018 11:34:37

---

So yes, based on s.1 direction, we do want to generate an AGRI submission now, and then again with the secretariat's submission.

s.1 can you estimate how much work this will require before the deadline of Jan 20<sup>th</sup>, given our focus on Cab subs and all the cannabis-related committees you support? For work planning discussions.

Thanks,

s.15,s.1

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, January 4, 2018 4:17 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** FW: Follow up to the Federal Consultation on Regulations  
Hi s.15,s.19

Please read the communication below. I have attached for you the document that I have generated thus far. AS AGRI had created a substantial list of questions and concerns that were not addressed at the bi-lateral discussion, we may want to consider an AGRI submission to the federal government. This action would need to be discussed ASAP with s.15,s.19 as feedback to the federal government is due Jan 20<sup>th</sup> I believe.

I will be following up with s.15 at the Secretariat to see how many of AGRI questions will be forwarded to the federal government and how the responses to those questions will be communicated back to AGRI.

Thanks, s.15,s.19

---

s.14,s.15,s.19



s.14,s.15,s.19

**From:** s.15,s.19 PSSG:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Follow up to the Federal Consultation on Regulations  
**Date:** Friday, January 5, 2018 12:09:22

---

Hi Jackie,

I'm not sure I can answer that. It depends on how long the meeting goes and the number of questions remaining overall. We'd certainly like to get answers on all of the questions, and there's no limit I've heard of on how many questions from each ministry we'll put forward.

Maybe we should have a phone call and go over the questions you sent to see what we have answers for already? Then for the remaining questions it might be worth flagging which ones are the priority.

s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, January 4, 2018 4:28 PM  
**To:** s.15,s.19 PSSG:EX  
**Subject:** FW: Follow up to the Federal Consultation on Regulations

Hi s.15,s.19

How many of AGRI's questions that were submitted could be addressed in this second opportunity for discussion with the federal government? Also, would Health Canada's answers be communicated back to the working group? And if so how?

Thanks s.15,s.19

s.14,s.15,s.19

Cell: s.15,s.19

**From:** Hayward, James  
**To:** s.15,s.19 \AGRI:EX  
**Cc:** s.15,s.19 \AGRI:EX  
**Subject:** RE: FPT Cannabis Working Group - Deck for Friday's ADM level discussion  
**Date:** Tuesday, May 8, 2018 11:20:49

---

There is no plan to include any information on prior programming at this stage.

James

---

**From:** s.15,s.19 \AGRI:EX [mailto:s.15,s.19 \@gov.bc.ca]  
**Sent:** May-08-18 1:10 PM  
**To:** Hayward, James  
**Subject:** RE: FPT Cannabis Working Group - Deck for Friday's ADM level discussion  
Thanks James

---

**From:** Hayward, James [mailto:James.Hayward@AGR.GC.CA]  
**Sent:** Tuesday, May 8, 2018 11:10 AM  
**To:** s.15,s.19 \GRI:EX  
**Cc:** s.15,s.19 \AGRI:EX  
**Subject:** RE: FPT Cannabis Working Group - Deck for Friday's ADM level discussion  
I will ask my Program Branch colleagues if there has been any thought given to that issue and get back to you.  
James

---

**From:** s.15,s.19 \AGRI:EX [mailto:s.15,s.19 \@gov.bc.ca]  
**Sent:** May-08-18 1:08 PM  
**To:** Hayward, James  
**Cc:** s.15,s.19 \AGRI:EX  
**Subject:** RE: FPT Cannabis Working Group - Deck for Friday's ADM level discussion  
Hi James,

I have reviewed the slide deck. I have one question:

Will the proposed communication include information as to previous eligibility of medical cannabis for BRM programs and whether or not any successful claims were made?

Regardless, the policy rationale for exclusion of cannabis after legalization remains unchanged (i.e. rapidly expanding volatile market) but having a prepared response for this potential inquiry would be beneficial.

Thank: s.15,s.19

---

**From:** Hayward, James [mailto:James.Hayward@AGR.GC.CA]  
**Sent:** Tuesday, May 8, 2018 9:51 AM  
**To:** 'David.Briggins@novascotia.ca'; 'Djiby.Sall@mapaq.gouv.qc.ca'; s.15,s.19 \AGRI:EX; 'Sarah.Elliott@ontario.ca'; 'anna.ilnycky@ontario.ca'; 'Kevin.Ferraro@ontario.ca'; 'cmmorrison@gov.pe.ca'; 'Ryan.Bourgeois@gnb.ca'; 'Katie.Sandhu@gov.mb.ca'; 'Shiferaw.Adilu@gov.ab.ca'; 'Robert.Moss@gov.sk.ca'; s.15,s.19 \AGRI:EX; 'Bruce Brolley'  
**Cc:** Rattray, Brian; Trickey, Mike  
**Subject:** RE: FPT Cannabis Working Group - Deck for Friday's ADM level discussion  
Hello all,

There is an ADM level meeting scheduled for Friday and my Business Risk Management (BRM) colleagues are leading development on a short deck, attached. This is a close to final version, there are still a couple of small changes to be made. This presentation is a follow-up to the last DM level discussion and the focus is on the implementation plan for the BRM decision, presuming there is

agreement from all jurisdictions. The intent would be to present a similar deck to DMs on May 24<sup>th</sup> and then have a discussion about what would be presented on cannabis at the Minister's meeting in July.

I am open to having a call before the meeting on Friday if there is interest. Alternatively, if there is any direction about what could be presented to Minister's that comes from the meeting we could have a discussion about that next week. Please let me know if you would like me to arrange a call this week.

Otherwise, as always, I am happy to discuss issues offline.

Regards,

James

James Hayward

Acting Director, Strategic Policy Branch  
Agriculture and Agri-Food Canada / Government of Canada  
[James.Hayward@agr.gc.ca](mailto:James.Hayward@agr.gc.ca) / Tel: 204-259-4198 / TTY: 613-773-2600

Directeur par intérim, Direction générale des politiques stratégiques  
Agriculture et Agroalimentaire Canada / Gouvernement du Canada  
[James.Hayward@agr.gc.ca](mailto:James.Hayward@agr.gc.ca) / Tél. : 204-259-4198 / ATS : 613-773-2600

**From:** Hayward, James  
**To:** s.15.s.19 AGRI:EX; "Djiby.Sall@mapaq.gouv.qc.ca"; s.15.s.19 AGRI:EX; "anna.ilnyckyj@ontario.ca"; "cmmorrison@gov.pe.ca"; "Ryan.Bourgeois@gnb.ca"; "Katie.Sandhu@gov.mb.ca"; "Shiferaw.Adilu@gov.ab.ca"; "Robert.Moss@gov.sk.ca"; "Bruce Brolley"; "Fernandes, Tamara (OMAFRA)"; "Penner, Jason AG (jason.penner@gov.sk.ca)"  
**Cc:** Rattray, Brian; Trickey, Mike  
**Subject:** RE: FPT Working Group on Cannabis  
**Date:** Tuesday, June 26, 2018 09:45:47  
**Attachments:** Cannabis\_Ministers - June 25 - F.ppt  
Cannabis\_Ministers - June 25 - E.ppt  
Cannabis background analysis.docx

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Hello all,

Following up on my last message, attached are the current documents that we have drafted for the Deputy Minister's call this week. The deck is an updated version of what was shared recently and the draft background paper (je vais partager la traduction des que disponible) is intended to provide more depth regarding the potential trajectory of the industry. The deck garnered minimal discussion on the last ADM's call so the changes are not major but do incorporate some input on what the industry may look like and include an update to reflect Royal Assent for C-45. As always we are open to any feedback on the material.

I would welcome your feedback on whether or not a call would be useful. If not any feedback by email would be appreciated.

Regards,

James

James Hayward

Acting Director, Strategic Policy Branch  
Agriculture and Agri-Food Canada / Government of Canada  
[James.Hayward@agr.gc.ca](mailto:James.Hayward@agr.gc.ca) / Tel: 204-259-4198 / TTY: 613-773-2600

Directeur par intérim, Direction générale des politiques stratégiques  
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[James.Hayward@agr.gc.ca](mailto:James.Hayward@agr.gc.ca) / Tél. : 204-259-4198 / ATS : 613-773-2600

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**From:** Hayward, James  
**Sent:** June-20-18 9:13 AM  
**To:** s.15.s.19 AGRI:EX; "Djiby.Sall@mapaq.gouv.qc.ca"; s.15.s.19 AGRI:EX; "anna.ilnyckyj@ontario.ca"; "cmmorrison@gov.pe.ca"; "Ryan.Bourgeois@gnb.ca"; "Katie.Sandhu@gov.mb.ca"; "Shiferaw.Adilu@gov.ab.ca"; "Robert.Moss@gov.sk.ca"; "Bruce Brolley"; "Fernandes, Tamara (OMAFRA)"; "Penner, Jason AG (jason.penner@gov.sk.ca)"  
**Cc:** Rattray, Brian; Trickey, Mike  
**Subject:** FPT Working Group on Cannabis

Hello all,

My apologies for not distributing sooner but I have attached the current deck (now out of date after last night's vote) on cannabis that will be discussed at an ADM level meeting tomorrow.

<< File: Cannabis\_MIN DM Annual Conference juin 19 - FRE.ppt >> << File: Cannabis\_MIN DM Annual Conference June 19 - ENG.ppt >>

Happy to receive comments or schedule a call. My suggestion would be to discuss early next week and I could debrief on the ADM discussion and next steps.

Regards,

James

James Hayward  
Acting Director, Strategic Policy Branch  
Agriculture and Agri-Food Canada / Government of Canada  
[James.Hayward@agr.gc.ca](mailto:James.Hayward@agr.gc.ca) / Tel: 204-259-4198 / TTY: 613-773-2600  
Directeur par intérim, Direction générale des politiques stratégiques  
Agriculture et Agroalimentaire Canada / Gouvernement du Canada  
[James.Hayward@agr.gc.ca](mailto:James.Hayward@agr.gc.ca) / Tél. : 204-259-4198 / ATS : 613-773-2600

**From:** s.15,s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** RE: s.12,s.13  
**Date:** Monday, March 5, 2018 09:19:18

---

Hi s.15,s.  
s.13

s.15,s.19

---

**From** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, February 27, 2018 2:44 PM  
**To:** s.15,s.1 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX  
**Subject:** s.12,s.13  
**Importance:** High  
Hi TJ,

s.15,s.19,s.22  
cabinet submission. s.12,s.13  
s.12,s.13

I am currently drafting a slide deck for

Thanks, s.15,s.19  
s.15,s.19  
Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19



s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** AGRI:FX  
**Cc:** s.15.s.19 AGRI:EX s.15.s. AGRI:EX  
**Subject:** RE: Information/discussion with MAH:s.13  
**Date:** Thursday, February 8, 2018 12:06:46

---

I'm so sorry! I forgot to add this entirely s.12,s. My sincere apology to you and s.1 it certainly won't happen again.

s.13,s.16

s.12,s. can provide you with any other details. Again, my sincere apology.

Take care,

s.12,s.13

---

**From:** s.12,s.13 AGRI:EX  
**Sent:** Thursday, February 8, 2018 9:32 AM  
**To:** s.12,s.13 AGRI:EX  
**Subject:** RE: Information/discussion with MAH:s.13

No dial in info

-----Original Appointment-----

**From:** s.12,s.13 AGRI:EX  
**Sent:** Wednesday, February 7, 2018 11:09 AM

To s.15,s.19 AGRI:EX s.15,s.19 \AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19  
MAH:EX s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX s.15,s.19  
s.15,s. AGRI:EX; s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX s.15,s.19 MAH:EX  
Cc s.15,s.19 MAH:EX; s.15,s.19 MAH:EX; s.15,s.19 MAH:EX s.15,s.19 MAH:EX;  
s.15,s.19 AGRI:EX s.15,s.19 \AGRI:EX; s.15,s.19 AGRI:EX

**Subject:** FW: Information/discussion with MAH: s.13

**When:** Thursday, February 8, 2018 9:30 AM-11:00 AM (UTC-08:00) Pacific Time (US & Canada).

**Where:** AGRI Victoria - 808 Douglas St - 1st Floor Boardroom

Hi s.12,s.13 – this is a meeting between AGRI and Municipal Affairs and Housing to discuss  
s.13

Thanks,

s.12,s.13

-----Original Appointment-----

**From:** s.15,s.19 AGRI:EX

**Sent:** Friday, February 2, 2018 3:27 PM

**To:** s.15,s.19 AGRI:EX s.15,s.19 MAH:EX s.15,s.19 AGRI:EX; s.15,s.19

AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX; s.15,s.19  
s.15,s. AGRI:EX s.15,s.19 MAH:EX

**Cc:** s.15,s.19 MAH:EX; s.15,s.19 MAH:EX; s.15,s.19 MAH:EX s.15,s.19 MAH:EX;

s.15,s.19 GRI:EX s.15,s.19 GRI:EX; s.15,s.19 \AGRI:EX

**Subject:** Information/discussion with MAH: s.13

**When:** Thursday, February 8, 2018 9:30 AM-11:00 AM (UTC-08:00) Pacific Time (US & Canada).

**Where:** AGRI Victoria - 808 Douglas St - 1st Floor Boardroom

Updated with location: we have Agriculture's 1<sup>st</sup> floor meeting room booked for this meeting.  
Look forward to seeing everyone.

\*\*\*\*\*

We have some updates to share with MAH and would like to suggest a group  
meeting/discussion. Key topics are:

s.13

3. Any other MAH-AGRI issues.

Thanks,  
s.15,s.19

**From:** s.15,s.19 PSSG:EX  
**To:** s.15,s.19 GRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 IRI:EX; s.15,s.1 GRI:EX; s.15,s.1 AGRI:EX  
**Subject:** RE: Invitation - Federal Consultation - Bi-lateral meeting  
**Date:** Wednesday, December 6, 2017 14:47:53

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Great – thanks!

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, December 6, 2017 2:44 PM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 GRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Invitation - Federal Consultation - Bi-lateral meeting  
Correctio s.15,s.19 will be the Agriculture rep for this meeting  
s.15,s.19

*Ministry of Agriculture*

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, December 6, 2017 2:42 PM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Invitation - Federal Consultation - Bi-lateral meeting  
s.15,s.19

will be the reps for Ministry of Agriculture

s.15,s.19

*Ministry of Agriculture*

s.15,s.19

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Tuesday, December 5, 2017 12:29 PM  
**To:** s.15,s.19 PSSG:EX; s.15,s.19 PREM:EX; s.15,s.19 SBRT:EX; s.15,s.19  
JAG:EX; s.15,s.19 PREM:EX; s.15,s.19 PSSG:EX; s.15,s.19 P HLTH:EX;  
s.15,s.19 MAH:EX; s.15,s.19 PSSG:EX; s.15,s.19 JAG:EX; s.15,s.19 HLTH:EX; s.15,s.19  
s.15, HLTH:EX; s.15,s.19 JTT:EX; s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX; s.15,s.19  
PSSG:EX; s.15,s.19 MCF:EX; s.15,s.19 GCPE:EX; s.15,s.19 EDUC:EX;  
s.15,s.19 PSSG:EX; s.15,s.19 PSSG:EX; s.15,s.19 IRR:EX; s.15,s.19 PSSG:EX;  
s.15,s.19 PSSG:EX; s.15,s.19 PSSG:EX; s.15,s.19 MAH:EX; s.15,s.19  
PSSG:EX; s.15,s.19 PSSG:EX; s.15,s.19 IN:EX; s.15,s.19 MAH:EX  
**Cc:** s.15,s.19 PSSG:EX; s.15,s.19 PSSG:EX  
**Subject:** Invitation - Federal Consultation - Bi-lateral meeting

Good afternoon,

Meeting details for the bi-lateral meeting with the Federal Secretariat to discuss the federal regulatory framework have now been confirmed and are as follows;

**December 15, 2017 9:00am – 11:00am**

**Metropolitan Hotel, 645 Howe Street, Vancouver Room (2<sup>nd</sup> Floor)**

**Vancouver, BC**

We welcome participation from all ministries and would appreciate if you could advise by email who your ministry representative will be as soon as possible.

If you have any questions please do not hesitate to contact me.

Thanks  
s.15,s.19

Cannabis Legalization and Regulation Secretariat  
Ministry of Public Safety and Solicitor General  
Office s.15,s.19  
Cell -s.15,s.19  
Emai

**From:** s.15,s.19 PSSG:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** SSG:EX  
**Subject:** RE: JCCR Meeting March 2, 2018  
**Date:** Wednesday, February 28, 2018 11:34:59

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Good mornin s.15,s.19

As a follow-up to the email thread below, I wanted to confirm that we did not receive specific questions from local government members regarding agricultural issues, but rather there is a JCCR agenda item "Agricultural Land Reserve" where local government members have requested information of the current rules associated with the ALR. As I've indicated below, once you provide an overview of the current rules, there will likely be questions from local government members of the JCCR. Please let me know if you have any questions regarding this agenda item.

Also, I wanted to confirm whether you will be participating in the JCCR meeting via video conference at the Sussex building, or participating via teleconference – I need to notify Sussex security in the case of the former.

Thank s.15,s.1

s.15,s.1 ^  
o

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, February 20, 2018 11:00 AM  
**To:** s.15,s.19 PSSG:EX  
**Subject:** RE: JCCR Meeting March 2, 2018  
Okay thank s.15,s.1  
o

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**From:** s.15,s.19 PSSG:EX  
**Sent:** Tuesday, February 20, 2018 7:49 AM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** FW: JCCR Meeting March 2, 2018

Hi s.15,s.19

Sorry for the multiple emails. After I sent the last email, I went through my notes from the last JCCR meeting, and remembered that local government members of the JCCR wanted to discuss current rules regarding the ALR. I think there may be some confusion around general rules for production on the ALR, as well as current rules for medical cannabis and role of local governments. This will be an item on the agenda, and after you provide an overview of the current rules, there will likely be questions from local government members.

s.15,s.1

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**From:** s.15,s.19 PSSG:EX  
**Sent:** Tuesday, February 20, 2018 7:39 AM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: JCCR Meeting March 2, 2018

Hi s.15,s.1

I don't believe there are AGRI specific questions at this time (most are regarding retail), but rather s.15,s.1 wanted you (or another representative from AGRI) at the meeting to answer any AGRI related questions that may come up during discussions. However, when I have the questions compiled I will ensure that I send your way immediately.

Thanks,

s.15,s.1

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, February 19, 2018 3:22 PM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: JCCR Meeting March 2, 2018

Okay thanks s.15,s.1. As responses to the questions may need higher level approval and or input from other ministry staff, I would appreciate the questions well in advance of the meeting so that my responses are as thorough as possible.

Thanks, s.15,s.1

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**From:** s.15,s.19 PSSG:EX  
**Sent:** Monday, February 19, 2018 1:14 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** JCCR Meeting March 2, 2018

Good afternoon s.15,s.19

Some local government members of the JCCR have provide s.15, with questions regarding the provincial framework, which she plans to table at the next JCCR meeting and provide responses verbally s.15 has requested that AGRI be present for the JCCR meeting to participate in discussions – I will put together the questions into one document and ensure you have them available prior to the meeting.

The next JCCR meeting is on Friday March 2, 2018 and will be held in the Vancouver and Victoria (10<sup>th</sup> floor Sussex) PSB boardrooms as a video conference. I will follow this email with the meeting invite, but please let me know if you're able to attend.

Thanks,

s.15,s.19

Cannabis Legalization and Regulation Secretariat  
Policing and Security Branch | Ministry of Public Safety and Solicitor General  
Ph: s.15,s.19



**From:** s.15,s.19 PSSG:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 PSSG:EX  
**Subject:** RE: jurisdictional scan  
**Date:** Tuesday, February 28, 2017 09:45:17  
**Attachments:** [CCSA-Cannabis-Regulatory-Approaches-Summary-2016-en.pdf](#)  
[Recent US Legislation.docx](#)

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Hi s.15,s.19

I am not aware of any jurisdictional scan with respect to agricultural policy and legislative issues encountered by other jurisdictions; however as s.1 mentioned below, there has been some research into the US States which have legalized cannabis, or are in the process. Please find attached a CCSA summary of current legalized jurisdictions (including Uruguay), as well as a document outlining the proposed regulations of the US States which recently voted in their federal election to legalize non-medical cannabis this past November.

Please advise if you have any further questions or require additional information.

Thanks,  
s.15,s.

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, February 28, 2017 9:11 AM  
**To:** s.15,s.19 PSSG:EX  
**Subject:** FW: jurisdictional scan  
Hi s.15,s.19

Are you available to have a conversation re: my request below?

Thanks, s.15,s.1

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**From:** s.15,s.19 PSSG:EX  
**Sent:** Monday, February 27, 2017 5:52 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX  
**Subject:** Re: jurisdictional scan

Hi s.15,s.

I am not sure what you are looking for exactly. We have done some research into the US which might be helpful.

I have copied s.15,s.19  
away.

will be able to help you while I am

Thank you.

s.15,s.19

Sent from my iPhone

On Feb 27, 2017, at 2:20 PM s.15,s.19 AGRI:EX <s.15,s.19 g@gov.bc.ca> wrote:

Hi s.15,s.19

I am getting started on conducting a scan of agricultural policy and legislative issues encountered by other jurisdictions. I know that members of the inter-ministry working group have been working on a jurisdictional scan to some degree. I wonder if you might be able to put me in contact with relevant individuals?

Thanks s.15,s.

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19



**From:** s.15,s.19 \AGRI:EX  
**To:** s.15,s.19 \AGRI:EX  
**Cc:** s.15,s.1 \AGRI:EX  
**Subject:** RE: Key messages for Minister\_cabinet mtg Sep 13  
**Date:** Monday, September 11, 2017 08:53:44  
**Attachments:** BN Cabinet Mtg Sep 13 2017.docx

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s.15,s.1 these are good. Made some minor changes, can you take a look and just fine tune please?  
s.12,s.13,s.15,s.19

Thanks

s.15,s.

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**From:** s.15,s.19 \AGRI:EX  
**Sent:** Friday, September 8, 2017 11:58 AM  
**To:** s.15,s.19 \AGRI:EX  
**Cc:** s.15,s.19 \AGRI:EX s.15,s.19 \AGRI:EX  
**Subject:** Key messages for Minister\_cabinet mtg Sep 13  
H s.15,s

For your review.

I have attached the key messages document for the Minister for Sept 13<sup>th</sup> Cabinet meeting.

s.15,s. had requested to receive by Sept 11, 2017 and requested the following key messages be addressed:

s.12,s.13

Thanks,s.15,s.

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15,s.19

Page 271 of 381 to/à Page 277 of 381

Withheld pursuant to/removed as

s.14

**From:** s.15,s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** RE: Local governance and cannabis production - technical/operational discussion  
**Date:** Tuesday, April 3, 2018 10:05:44

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Sure.  
s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, April 3, 2018 10:05 AM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Local governance and cannabis production - technical/operational discussion  
Thanks s.15, – I'll follow up with s.15, today. Should I copy you on that email?

s.15,s.19

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**From** s.15,s.19 GRI:EX  
**Sent:** Tuesday, April 3, 2018 9:08 AM  
**To** s.15,s.19 GRI:EX  
**Subject:** RE: Local governance and cannabis production - technical/operational discussion  
Hi s.15,s.19

I'd be interested in participating but there may be a better candidate in the SD Branch. If the committee will focus on the ALR, then a regional agrologist is likely more appropriate than an industry specialist. I suggest sending the request s.15,s.19 He can determine the best staff person(s) from the SD Branch.

Regards,  
s.15,s.19

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**From** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, March 27, 2018 6:53 PM  
**To** s.15,s.19 AGRI:EX; s.15,s.19 ALC:EX; s.15,s.19 MAH:EX; s.15,s.19  
ALC:EX; s.15,s.19 MAH:EX; s.15,s.19 AGRI:EX  
**Cc** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 ALC:EX; s.15,s.19  
MAH:EX

**Subject:** Local governance and cannabis production - technical/operational discussion

Hi everyone,

Most of you have been involved in policy discussions around cannabis production in the ALR, either directly with s.15,s.19 or at the Joint Provincial-Local Government Committee on Cannabis Regulation (JCCR). We'd like to work with you to better understand local governance-related issues at a more operational level so we are clear about existing tools, gaps, etc. We intend to invite the UBCM s.15,s.19 to participate. Working with partners is always critical in policy development, but we are confirming JCCR protocol because of its policy role.

Can you please identify who from your group could participate in these discussions? Timing would be to start in the next two weeks, depending on schedules.

Thanks in advance for your help!

s.15,s.19

Corporate Governance, Policy & Legislation Branch  
BC Ministry of Agriculture  
th

s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Looking for stats on greenhouses in BC  
**Date:** Thursday, May 31, 2018 10:40:06

---

Hi s.15,s.1

I actually heard back from s.15,s.19. We don't have this information but the industry specialist s.15,s.19 may be able to help. I have cc'ed s.15,s.19 on this email chain.

Thanks

s.15,s.19

Corporate Governance, Policy & Legislation

Ministry of Agriculture

s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, May 31, 2018 9:47 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** Looking for stats on greenhouses in BC  
Hi s.15,s.19

I have a number of questions I am looking for answers to. If any of this information is available through stats it would be helpful.

Below is a list of questions that we are looking for answers to:

1. What are the most common types of greenhouse structure used for commercial production in B.C. for:
  - a. Vegetables
  - b. Floriculture
  - c. Nurseries
  - d. Cannabis
  - e. Other
2. What is the average size (m2) of greenhouses used for different industries?
  - Average or range of Floriculture Greenhouse is:
  - Average or range of Vegetable Greenhouse is:
  - Average or range of Nursery Greenhouse is:
  - Average or range of Cannabis Greenhouse is:
3. For each Greenhouse structures what is the typical flooring used?
  - a. Soil
  - b. Cement
  - c. Gravel
  - d. Plastic covering
  - e. Some combination of the above
  - f. Other
4. Of the greenhouse structures with cement/gravel floors, what percentage of the floor is covered in cement/gravel?
5. What parts of a typical greenhouse structure have a flooring area that is cement/gravel?
  - a. Head house

- b. Propagation area
- c. Cultivation area
- d. Walkways
- e. Perimeter
- f. Other

6. Of the greenhouse structures most commonly used, which ones require the use of fill?

7. For greenhouses that use fill what is the purpose of the fill?

- a. To provide structure stability
- b. To encourage drainage
- c. Other

Thanks, **s.15,s.1**

**s.15,s.19**

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

**s.15,s.19**



**From:** s.15.s.19 ALC:EX  
**To:** s.22 s.15,s. ALC:EX  
**Cc:** s.15,s.19 ALC:EX s.15,s.1 ALC:EX; s.15.s.19 AGRI:EX  
**Subject:** RE: Marijuana bunkers on ALR land  
**Date:** Wednesday, January 10, 2018 16:19:54  
**Attachments:** ~WRD000.jpg

---

s.15,s

Thank you for your comments about Marijuana bunkers/greenhouses on ALR land.

This is to confirm that medical marihuana production is currently a permitted use within the ALR (in bunker, non-greenhouse facilities). This is also to confirm that greenhouse development for any type of crop is permitted in the ALR.

The ALC appreciates your comments about the potential negative land use impacts arising from unrestricted greenhouse development in the ALR associated with imminent legalization of recreational marihuana.

The ALC is currently in discussions with the province about what is a suitable regulatory regime for recreational marihuana, which is proposed to be a lawful crop in mid 2018.

Your comments will be provided to those developing the regulatory land use regime for recreational marihuana.

Regards

s.15,s.19

Agricultural Land Commission

s.15,s.19

**From:** s.22

**Sent:** Wednesday, January 10, 2018 3:32 PM

**To:** s.15,s.19 ALC:EX

**Cc:** s.15,s.19 ALC:EX; s.15,s.19 ALC:EX; s.15,s.19 ALC:EX

**Subject:** Marijuana bunkers on ALR land

Re: Allowing marijuana "greenhouses" on ALR land

I am puzzled, concerned, and disturbed that the ALC allows marijuana greenhouses to be built over ALR land.

Hydroponic greenhouses do not need prime agricultural soil, they only need a location. Non-arable, even rocky terrain, would do, leaving ALR land available for growing food, which is increasingly important given growing populations, global warming, and the desire for locally produced food. The concrete bunkers that pass as marijuana "greenhouses" will not use the land, they will only despoil it, then sit on it, making a mockery of the ALR's mandate.

When marijuana operations fail, and some will, what recourse will municipalities and the ALC have regarding the mess left behind? Could the land be made arable again? At what cost? I've read that construction fill, including drywall, can be used as fill by some of these marijuana operations. Even our garbage landfills don't accept drywall.

I have nothing against marijuana cultivation, or the building of successful companies, though I find some of these marijuana proposals greedy. For example, Evergreen Medicinal Supply plans to cover 36 acres of the ALR in Central Saanich with wall to wall two story concrete "greenhouses". He plans to spend \$500 million to ultimately earn \$1 billion per year. I also wonder what his plans are for the other 64 acres on this 100 acre site. Add more greenhouses, or sneak in a parking lot for the 3 shifts of 500 employees each which he currently says he will bus in from an industrial area over a mile away?

I read in the news about the astonishingly inflated prices marijuana growing companies are paying farmers for land that has traditionally been cheaper than most in order to encourage food farming, which is so much less profitable. The deep pockets of the marijuana companies gives them a huge advantage. How can farmers be expected to resist these high offers? How will people who want to buy ALR land to grow food crops compete? Will any one want to grow food, if they can make so much more money

growing marijuana?

Will anyone be able to control the amount of the ALR sold for this use, and what effect will diminished local food growing have on everyone who eats. (Not everyone uses marijuana.)

Would it be possible to call a halt on these operations until the provincial government has had a chance to study the possible impacts of the marijuana rush? Until all levels of government and the ALC are certain they want to deprive present and future generations of precious food growing land?

Could marijuana growers be given a separate category with rules and regulations that will preserve the ALR for what it was originally intended, and keep marijuana operations from disturbing and uglifying existing neighbourhoods?

Thank you for listening to a federal, provincial and municipal tax payer.

s.22



**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Marijuana meeting follow-up - taxation  
**Date:** Friday, January 19, 2018 15:27:15

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Thanks s.15,s.19. I cc'd s.15,s.19 only because the three of us were talking about it together after the meeting, I didn't think s.15,s.19 – sorry if that was inappropriate.  
Anyways, I take your point that it's not AGRI's place to discuss tax policy at meetings like today.  
Regardless, sorry for the trouble, happy to leave it there.  
s.15,s.19

British Columbia Ministry of Agriculture  
s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, January 19, 2018 2:52 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Marijuana meeting follow-up - taxation  
Hi s.15,s.19

s.15,s.19 for the Cannabis Secretariat. In the future please cc s.15,s.19  
s.15,s.19 instead of s.15,s.19. The conversation around taxation that you are referring to is one that has been ongoing for several months between MAH and AGRI and is now sitting at the Economic Development Sub-working group as part of the ongoing work of the Inter-Ministry Cannabis Working Group.  
Your comments around taxation are valid however and whether or not clarification on this piece is required at the Provincial/ Local government committee table is one that I can discuss further with the Secretariat.  
Thanks s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, January 19, 2018 1:19 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 PSSG:EX  
**Subject:** Marijuana meeting follow-up - taxation  
Hi s.15,s.19

Thanks again for helping with my disastrous coffee spill.  
I wanted to follow up on the taxation item we were talking about at the meeting today. I was trying to explain that currently medical marijuana producers are not given farm classification by BC Assessment for property taxation purposes. This is regardless of whether they're in the ALR or not. (Even for farmers of products other than medical marijuana, simply being on the ALR and growing something in any amount does not automatically give them farm classification for assessment/taxation purposes – the minimum thresholds for farm receipts are set by BC Assessment and must be proven/maintained by the farmer).  
Please see this FAQ on the BC Assessment website for the Assessment Act citation:  
<https://info.bcassessment.ca/Services-products/property-classes-and-exemptions/farm-land-assessment/medical-marihuana-property-class>  
We heard clearly today from the LG representatives that “it's not fair for medical marijuana producers to pay no taxes” – this seemed to form part of their opposition to having growers in their jurisdiction, that the LG is getting no taxation benefit. I think this is a misunderstanding on their part

that needs to be cleared up. Maybe we can raise it at the next meeting or an email to the group? Obviously this is subject to change with the Cannabis Act and the declassification of marijuana as a narcotic, and it may be different for recreational growing as well, but for the time being medical growers are not given the farm tax exemption.

Overall the meeting was very interesting and I appreciated being there, seems like a pretty knowledgeable group. I think the issue of how much an LG can regulate marijuana production in their jurisdiction is a huge one. On the land use planning side, we're already dealing with a number of municipalities who are struggling to deal with applications for large facilities that they don't feel equipped to deal with. Looking forward to learning more and helping out however I can.

Thanks

s.15,s.19

British Columbia Ministry of Agriculture

s.15,s.19

Page 286 of 381 to/à Page 292 of 381

Withheld pursuant to/removed as

s.14

**From:** s.15,s.19 ~~GRI:EX~~ s.15,s.19  
**To:** ~~AGRI:EX~~ AGRI:EX  
**Cc:** ~~AGRI:EX~~  
**Subject:** RE: More possible estimates topics  
**Date:** Tuesday, October 3, 2017 09:52:37  
**Attachments:** image001.jpg

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Hi again team –

So it turns out that this is a very interesting question and one with uncertain answers! How neat. Two online resources I found that appear at least somewhat reputable (Osler Law and Cannabis Compliance Incorporated, see below my signature line for full quotations and sources) come to the defensible position that licence-holders under the ACMPR will automatically be allowed to produce **both** medical and recreational cannabis. This is because under s. 158(1), licences under the ACMPR will automatically carry-over and be deemed to have been granted under s. 62 of the Cannabis Act. Sections 158(1) and 62(1) are written in broad language and do not specify that ACMPR licence-holders will not be allowed to grow recreational cannabis. Furthermore, the definition of “cannabis” under the Act is broad and does not differentiate between medical and recreational cannabis. At this stage of my review, it seems that the Act does not make many significant distinctions between medical and recreational cannabis. One example of such a distinction arises in s. 62(2) which states that licences/permits authorizing the importation/exportation of cannabis may be issued only in respect of cannabis for medical or scientific purposes or in respect of industrial hemp. To some extent, this supports the argument that the s. 158(1) grandfathering will allow ACMPR licence holders to grow both medical and recreational cannabis once the Cannabis Act comes into force. I say this because it indicates that the Government turned its mind to medical cannabis in one context (import/export licences) but left this specification out of the grandfathering respecting ACMPR production licences.

However, the grandfathering of ACMPR production licences in s. 158(1) will be subject to regulations made under the Act (see s. 158(4)) which we currently know nothing about. This means that future regulations could clarify that ACMPR licence-holders will remain licence-holders only with respect to medical cannabis. This explains why I have said the answer to this question seems uncertain to me. If licence-holders under the ACMPR cannot automatically begin growing recreational cannabis once the Cannabis Act comes into force, I note that under s. 62 the Minister (Federal Health) may issue, renew or **amend** licences and permits that authorize production, etc. It seems to me that this section would allow a holder of a medical cannabis production licence to apply for an amendment to that licence in order to grow non-medical cannabis if that became necessary under future regulations.

In addition to this, the Minister may, on his/her own initiative, amend a licence or permit if he/she is of the opinion that the amendment is necessary to protect public health or public safety (s. 63). I cannot easily imagine a scenario in which amending a medical cannabis production licence to allow for non-medical cannabis production would be in “necessary to protect public health or public safety”, but for the sake of fulsomeness, I thought it wise to inform you of this Ministerial power as well.

Please let me know if I can assist further. Thank you!

Kindly,

s.15,s.19



P.S. Here are the quotations from the sources I mentioned above in case you find them helpful.

- Current holders of licences relating to medical cannabis under the *Access to Cannabis for Medical Purposes Regulations* (ACMPR) made under the *Controlled Drugs and Substances Act* will be automatically licensed under the Cannabis Act for those activities. In other words, it appears that if the Cannabis Act is made law, licence holders under the ACMPR will be able to conduct the activities authorized by their licence with respect to both medical and non-medical (i.e., recreational) cannabis: see <https://www.osler.com/en/resources/regulations/2017/on-the-road-to-legalization-highlights-of-canada> accessed on Oct 3, 2017.
- ... Section 158 clearly states that any licences (or applications for a licence) under the *Access to Cannabis for Medical Purposes* (ACMPR) are grandfathered into the new jurisdiction of the Act. From this we can assume that this new Act will therefore govern both medical and recreational. But what is not clear is what the pending Regulations will dictate. The Act clearly sets out provisions for retail sales (and online distribution/retail), but the Act does not specifically address any special provisions for medical cannabis production/sales separate from those of recreational production/sale. Even though the press conference speakers confirmed verbally that the ACMPR will remain in effect for some time (e.g., five years review period), there is little insight into whether the recreational model will differ from a medical model. It is certainly possible that any future Regulations will lay out a different licensing structure or requirements, for production or retail. The only thing we seem to know at this time is that both the ACMPR and the future recreational regulations will be empowered by this *Cannabis Act*. There is a lot of room for speculation. See: <http://www.cannabiscomplianceinc.com/introducing-the-cannabis-act/>

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, October 3, 2017 8:44 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: More possible estimates topics  
Hi s.15,s.19

s.15,s. can you please double check and confirm?

The federal government has not said anything yet about transferable licences i.e. a licence to produce medical cannabis being changed to a licence to produce non-medical. Joint licences will be permitted. i.e. one operator has two licences (med and non-med cannabis).

Licences are not permitted to be transferred to another operator.

s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, October 2, 2017 5:03 PM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** More possible estimates topics

Senior Exec. met with the Liberal MLAs today and they mentioned more topics/questions that they

would raise in estimates, as discussed this afternoon, we may need to scramble together some info on these so if we can be ready it will be easier. Only focus on the topics where I've indicated your name.

- Where are we at with puppy mills legislation/regulation <sup>s.15,s.19</sup>
- Medical marihuana (likely related to Chilliwack which will likely mean a focus on transferable licenses) - <sup>s.15,s.1</sup>
- Agriculture sector funding in other ministries' budgets - ? not sure what this is related to?
- Mandate commitments on Buy BC, Grow BC, Feed BC - <sup>s.15,s.1</sup> Feed BC only
- Minister's statement on price of farmland (Aug.20<sup>th</sup> media) and whether there is evidence of price increases in Zone 2 since changes brought into effect – ALC / <sup>s.15,s.19</sup>
- Any data on use of second houses on zone 2 farmland. Same question on use of life leases. – ALC / <sup>s.15,s.19</sup>
- Plans for consulting on ALR changes – <sup>s.15,s.19</sup>
- Update on Canadian Agricultural Partnership – <sup>s.15,s.1</sup>
- Panel members format – Don't understand topic
- Value-added uses on ALR – could be breweries <sup>s.15,s.19</sup>
- Foreign ownership of agricultural land (stats) – <sup>s.15,s.19</sup>
- Mega homes on ALR – strengthening farmin <sup>s.15,s.19</sup>
- Supply management – BC FIRB / <sup>s.15,s.19</sup>
- Brunswick point agricultural lands – Strengthening Farming?
- Minimum wage increases and impact on sector - <sup>s.15,s.19</sup>
- Carbon Tax increases and impact on sector <sup>s.15,s.19</sup>
- Importance of migrant workers – <sup>s.15,s.19</sup>



**From:** s.15,s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** RE: Outdoor cannabis production????  
**Date:** Friday, June 8, 2018 13:13:01

---

Thanks, s.15,s.19. The notes are essentially what I expected to hear. HC is moving forward with plans to legalize outdoor production and the provinces/municipalities will establish rules with respect to where it can be grown etc. I still don't support it but I guess we are stuck with outdoor production.  
s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, June 8, 2018 11:49 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** FW: Outdoor cannabis production????

Hello All,

Please see the notes below with regards to outdoor Cannabis production, information provided by Health Canada on the topic.

Thanks, s.15,s.19

---

**From:** Rattray, Brian [mailto:Brian.Rattray@AGR.GC.CA]  
**Sent:** Friday, June 8, 2018 11:23 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** Trickey, Mike; Hayward, James  
**Subject:** RE: Outdoor cannabis production????

Hi s.15,s.19

We did up a few notes (see below) for our senior management that we are happy to share. I hope they are useful.

Have a nice weekend.

Brian

---

On June 6<sup>th</sup>, a conference call took place between Health Canada, AAFC and PTs to discuss outdoor production of cannabis:

- Health Canada lead the discussion and some PTs asked a number of specific questions.
- Health Canada opened by summarizing the process that lead to the decision to include outdoor production, referring to the Task Force's recommendations and feedback from the Consultations. The rationale to include outdoor production primarily stems from benefits related to environmental stewardship (less energy use, water, etc.).
- Health Canada spoke at some length about the security requirements for outdoor cannabis, tracking of cannabis, and requirements that will be determined at provincial/municipal levels (such as location of outdoor production).
- When asked by NB about the level of interest from LPs for outdoor production, HC indicated that LPs are not very interested at this time, as they have invested a great deal indoor grow. Other deterrents included only 1 harvest per year versus 1-4; quality concerns).

Security and Tracking:

- There was a question regarding physical security around sites. HC explained that fencing/security must be designed to prevent unauthorized access. There is no set height or list of materials that must be used. LPs must submit a plan and HC has the final say whether

that plan is reasonable.

- CRA will also have an important role in tracking cannabis. Sites will be subject to random inspections.
- Security clearances will be subject to perpetual vetting.
- Regarding micro-cultivation, there will be reduced security requirements (no video monitoring), but all other requirements will be the same.
- Provinces asked whether there will be a cap on micro-cultivation. HC responded there is no cap but that government could prioritize applications.

Cross-pollination:

- QC and MB asked whether they will be any federal controls to manage cross-pollination. HC responded that are working with the CHTA and the seed trade to address potential for cross-pollination from hemp to marijuana, but that in their estimation there should not be an issue for hemp growers because marijuana production uses female plants.
- Both indoor and outdoor production must adhere to good production practices.

Other questions on legalization:

- There were some questions regarding the way hemp will be treated. HC reviewed the plans for hemp under the renewed IHR under the Cannabis Act.
- A question was asked regarding whether there will be a limit on potency. There will be no limits for THC potency in dried cannabis at this time.
- Responding to a question on research licenses, HC explained that research licenses requirements would be tailored to the specific activity.
- MB asked if HC had heard whether any provinces intended to restrict outdoor production the same way they were going to restrict personal grow. HC responded they that they did not know if this would be looked at the same way (as restrictions of personal grow).
- HC was asked whether there would be a delay from the time the cannabis is legalized, to approval of licenses for outdoor cultivation. HC responded there would be a definitely be a lag from the time of an application is submitted to the time a licensed is approved and that from a practical point of view there will not be any outdoor production in 2018.
- HC committed to continued dialogue with PTs post Royal Assent.

---

**From** s.15,s.19 AGRI:EX [mailto:s.15,s.19@gov.bc.ca]

**Sent:** Friday, June 8, 2018 12:08 PM

**To:** Trickey, Mike ; Rattray, Brian

**Subject:** RE: Outdoor cannabis production????

Hi Mike and Brian,

Are there any notes from the meeting that could be forwarded to me and or could a conversation be arranged to communicate the information to myself and some of my colleagues?

Thanks s.15,s.19  
9

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**From:** Trickey, Mike [mailto:Mike.Trickey@AGR.GC.CA]

**Sent:** Thursday, June 7, 2018 6:18 AM

**To:** Rattray, Brian; s.15,s.19 AGRI:EX

**Subject:** RE: Outdoor cannabis production????

I was wondering what happened to BC.

We had a good turnout from all of the other PTs.

---

**From:** Rattray, Brian

**Sent:** June-07-18 7:09 AM

**To:** s.15,s.19 AGRI:EX

**Cc:** Trickey, Mike

**Subject:** RE: Outdoor cannabis production????

Good morning s.15,s.19

Sorry to hear that as the call took place at 12:30pm Eastern time. I have copied my colleague Mike Trickey on this email to see if there might be any follow-up to the call.

Regards,

Brian

Brian Rattray

Deputy Director, Crop Sector Policy Division / Strategic Policy Branch

Agriculture and Agri-Food Canada / Government of Canada

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Directeur adjoint, Division des politiques du secteur des cultures / Direction générale des politiques stratégiques

Agriculture et Agroalimentaire Canada / Gouvernement du Canada

[brian.rattray@agr.gc.ca](mailto:brian.rattray@agr.gc.ca) / Tél. : 613-773-0157 / ATS : 613-773-2600

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**From:** s.15,s.19 AGRI:EX [mailto:s.15,s.19]@gov.bc.ca]

**Sent:** Wednesday, June 6, 2018 3:39 PM

**To:** Rattray, Brian <[Brian.Rattray@AGR.GC.CA](mailto:Brian.Rattray@AGR.GC.CA)>

**Subject:** Outdoor cannabis production????

Hi Brain,

Myself and some of my colleagues are on the outdoor cannabis call and no one from Health Canada is on to moderate the call. DO you have any information?

Thanks s.15,s.1

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** Ferraro, Kevin (OMAFRA)  
**To:** s.15.s.19  
**Subject:** RE: Outdoor production financial analysis  
**Date:** Tuesday, February 27, 2018 19:29:49

AB	Bruce Brolly	Senior Policy Analyst	<a href="mailto:bruce.brolley@gov.ab.ca">bruce.brolley@gov.ab.ca</a>
MB	Ketie Sandhu	Policy Specialist	<a href="mailto:ketie.sandhu@gov.mb.ca">ketie.sandhu@gov.mb.ca</a>

Hi s.15.s.19 I am trying to recall from our conversations but I am not 100% I think you are right but I also know Ketie in MB was about to partake in an exercise to assess indoor vs outdoor to better inform their decision makers as to whether they want to permit outdoor cultivation at all.

I'll ask around here in ON too as I know our crop specialists were starting to think about that but suspect they aren't there yet.

Sorry that isn't more helpful

Kevin

---

**From:** s.15.s.19 AGRI:EX [mailto:s.15.s.19@gov.bc.ca]

**Sent:** Tuesday, February 27, 2018 5:37 PM

**To:** Ferraro, Kevin (OMAFRA)

**Subject:** Outdoor production financial analysis

Hi Kevin,

I wondered if you might be able to help me find out which province had completed a financial analysis for outdoor cannabis production? I think it might have been Alberta but I'm not sure. I'd like to touch base with them to get a bit more detail.

Thanks s.15.s.19

s.15.s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15.s.19

**From:** Meeri Durand  
**To:** s.15,s.19 [ALC:EX](#)  
**Cc:** [AGRI:EX](#)  
**Subject:** RE: Query about Cannabis production in the ALR  
**Date:** Friday, February 16, 2018 09:27:28

---

Thank you s.15,s.19

I also spoke directly with the federal government and it looks like we can anticipate more clarity on how they will be managing the production process in the next month. I will focus my efforts on just providing our Board with the necessary changes to land use regulation for retail sales and anticipated production based on current circumstances for now in which we enable on agricultural and industrial lands and that we be explicit in it not being a permitted horticultural use in those residential zones that allow for such use or for farm gate sales (aside from personal cultivation). Our board is primarily concerned with the estimated 2000 small scale un-licensed facilities in our rural areas and how we can make them safer and transition them. I suspect that will not be an easy undertaking for either the province or local governments.

Appreciate all your efforts on this issue.

Take care,

**Meeri Durand**

*Planning Manager*

**Regional District of Central Kootenay**

Box 590, 202 Lakeside Drive, Nelson, BC V1L 5R4

**Phone:** (250) 352-8162 **Fax:** (250) 352-9300

**Web:** [www.rdck.ca](http://www.rdck.ca) **Friend us on Facebook**

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**From** s.15,s.19 [ALC:EX](#) [mailto:s.15,s.19@gov.bc.ca]

**Sent:** February-15-18 3:40 PM

**To:** Meeri Durand

**Cc:** s.15,s.19 [AGRI:EX](#)

**Subject:** Query about Cannabis production in the ALR

Meeri

Thank you for your query of February 15, 2018 concerning Cannabis production in the ALR.

Unfortunately the ALC is unable to provide advice at this time about Cannabis production as there are still discussions occurring about the appropriate provincial legislative and regulatory framework for Cannabis production, processing and sales.

However, I urge you to contact s.15,s.19 at the Ministry of Agriculture for more information and/or a timetable for further information. Her e-mail is provided above.

s.15,s.19

Agricultural Land Commission

s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** MAH:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Question about comments  
**Date:** Wednesday, December 13, 2017 08:48:57

---

The ALCA and its regulations only apply to ALR lands. Not all lands in a municipality are in the ALR or zoned for farming and a municipality is not restricted to the ALCA or the requirement under the LGA that the Minister approve those bylaws in relation to farming areas [ALR or zoned for farming].

---

**From:** s.15,s.19 MAH:EX  
**Sent:** Wednesday, December 13, 2017 8:43 AM  
**To:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX  
**Subject:** Question about comments

Hi there. Wondering if you could please clarify something for me regarding the questions Finance has asked. Can you please clarify why Delta was able to pass its bylaws if they require MAGRI approval and are not in compliance with ALCA? Thanks!

There are four local governments (Delta, Kelowna, Langley and Abbotsford) that are regulated communities under the *Local Government Act*. This means that these municipalities may make bylaws in relation to farming areas [ALR or zoned for farming] respecting the conduct of farm operations; however, these bylaws require approval by the Minister of AGRI and would need to comply with the ALCA and its regulation.

**From:** s.15,s.19 PSSG:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** AGRI:EX  
**Subject:** RE: Question for Health Canada  
**Date:** Wednesday, July 26, 2017 11:37:05

---

Thank: s.15,s.1  
9

I will move forward to see what information we can obtain from the federal Secretariat.

s.15,s  
19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, July 26, 2017 10:54 AM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Question for Health Canada  
Hi s.15,s.1

Thanks for the quick follow-up. You are correct. The address of the production facility is what we are looking for. If they won't release the addresses, then whether or not production facilities are in the ALR would be equally helpful.

I have reviewed the ACMPR website. Not all facilities provide an address and for the ones that do, it is difficult to determine whether they are on the ALR from the information provided (e.g. P.O. Boxes, address indicated as head office).

Additionally information that would be useful includes:

- Location of licenced designated producers (are any located in the ALR)
- The location of current producer applications that are waiting for approval (how many would be located in the ALR).
- Whether commercially licenced producers have one or more facilities (whether or not they are located in the ALR)
- Size (land foot print) and type of facility (bunker, greenhouse) would be useful.

Moving forward, I suspect that it may be of interest to the province to determining the federal government's intent to share this information in the future and whether or not that information would be shared pre or post build.

Thanks, s.15,s.19

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**From:** s.15,s.19 PSSG:EX  
**Sent:** Wednesday, July 26, 2017 8:30 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Question for Health Canada  
Good morning s.15,s.1

Just for clarification, you are seeking the physical locations of each of the federally licensed producers of medical cannabis located within BC to confirm whether they are located on ALR, correct? In other words, we are not expecting the Government of Canada to provide the information with respect to operations on ALR, but rather, the Province will determine whether the licensed producers are on ALR from the physical address provided by the federal government.

Also, as you know, the names, websites, and phone numbers of the federally licensed producers are available on the ACMPR website. Has there been any success (or lack of success) in getting the physical locations of the cultivation facilities using this information? I wanted to confirm before we put forward our question to the federal Secretariat that we've explored the information available to us.

Please let me know. Thanks,

s.15,s.19

Police Services Division - Ministry of Public Safety and Solicitor General

Ph s.15,s.19

s.15,s.19

**From:** AGRI:EX

**Sent:** Tuesday, July 25, 2017 10:04 AM

**To:** s.15,s.19 PSSG:EX

**Cc:** s.15,s.19 AGRI:EX

**Subject:** RE: Question for Health Canada

Hi s.15,s.19

Thanks for the update. I suspected the information might take some time to get if at all. I can certainly work on it on my end too. With the focus of the new AGRI Minister on the ALR I suspect this information will become a higher priority for AGRI.

Thanks, s.15,s.19

From s.15,s.19

PSSG:EX

**Sent:** Tuesday, July 25, 2017 9:58 AM

**To:** s.15,s.19 AGRI:EX

**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX

**Subject:** RE: Question for Health Canada

Good morning s.15,s.19

I initially contacted Health Canada back in June in an attempt to get the locations of licensed medical producers of medical cannabis within British Columbia, but with no success. Unfortunately, I'm limited to their toll free number in which all individuals have access. After spending a long time on hold, I was informed that they cannot release that information; however, this is not surprising because the toll free number is for general inquiries with the ACMPR, including how to register for access to medical cannabis. Since my initial attempt, I haven't had an opportunity to follow-up with Health Canada as the policy option papers took a great deal of time to coordinate, review, summarize, etc. but I will attempt to find other means to gain this information. I personally don't have any contacts from the federal Secretariat or Health Canada, but perhaps someone else on our Secretariat will be able to assist. I will let you know.

Thanks,

s.15,s.19

Police Services Division - Ministry of Public Safety and Solicitor General

Ph: s.15,s.19

From s.15,s.19

AGRI:EX

**Sent:** Tuesday, July 25, 2017 9:44 AM

**To:** s.15,s.19 PSSG:EX

**Cc:** s.15,s.19 AGRI:EX

**Subject:** Question for Health Canada

Hi s.15,s.19

Can you tell me if you have had any success contacting Health Canada re: location of medical cannabis production facilities in BC (specifically to find out if any are located on the ALR)?

Thanks, s.15,s.19

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19



**From:** s.15,s.19 ; PSSG:EX  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX  
**Subject:** RE: Questions for Health Canada  
**Date:** Thursday, February 22, 2018 08:22:28

---

Hi s.15,s.  
.19

We will send these questions to the federal Secretariat and see if they can either respond or refer us to someone who can.

Thank you.

s.15,s.19

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**From** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, February 21, 2018 1:51 PM  
**To:** s.15,s.19 ; PSSG:EX  
**Cc:** s.15,s.19 ; PSSG:EX  
**Subject:** Questions for Health Canada  
Hi s.15,s.19

As discussed today s.15, a couple of questions have arisen that require answers from Health Canada.

- 1) Will the province have any ability to determine what type of production will be permitted in the province (e.g. prohibiting open field production)?

NOTE: In an AGRI PT discussion group, Manitoba indicated that HC had told them they would be able to determine what types of production would be allowed in the province. As this was not the message we received I'd like to clarify whether or not this is the case.

- 2) Certified Organic Associations of British Columbia (COABC) Accreditation Board (AB) has had interest from several of their Certifying Bodies (CB) to certify cannabis. Would anything preclude COABC from offering certification to organic cannabis growers? Is there anything that COABC would need to do under federal regulations prior to beginning to certify growers?

Thanks s.15,s.19  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 PSSG:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX; s.15,s.19 PSSG:EX  
**Subject:** RE: Questions for UBCM advisory group  
**Date:** Tuesday, January 16, 2018 10:25:56

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Of course – thank you for letting us know.

**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, January 16, 2018 10:23 AM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Questions for UBCM advisory group  
Hi s.15,s.

I would like to request that s.15,s.19 attend the meeting with me on Friday s.1 works for AGRI's s.15,s.19  
Thanks, s.15,s.19

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Friday, January 12, 2018 4:41 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Questions for UBCM advisory group  
Thanks s.15,s. – we'll send them out. The next meeting is Jan 19 from 9-12 and I've forwarded you the invite. Have a good weekend☺

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, January 12, 2018 11:52 AM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Questions for UBCM advisory group  
Hi s.15,s.

I have worked with s.15,s.19, who works alongside local government, to revise these questions.

1. What has been your experience regarding bylaw development for medical cannabis production in your community?
2. What has been your experience regarding compliance and enforcement for medical cannabis production in your community?
3. Can you provide any suggestions (tools, resources, support) to help local governments minimize any potential concerns/issues regarding medical cannabis production?
4. Can you provide any suggestions (tools, resources, support) to help local governments encourage any potential opportunities/benefits regarding medical cannabis production?
5. How have the different classifications of medical cannabis licensed production facilities (designated producer, commercial producer) impacted your community?

I hope the revised questions are clear. I believe they should help elicit useful information.

Thanks, s.15,s.19

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**From:** s.15,s.19 PSSG:EX  
**Sent:** Thursday, January 11, 2018 4:16 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Questions for UBCM advisory group

Sounds good – thanks. It may help you to know that there has already been some discussion at the JCCR table about problems associated with designated growers, so participants may be confused by

questions that just refer to medical production, which includes both licensed producers and designated growers.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, January 11, 2018 3:49 PM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Questions for UBCM advisory group  
Hi s.15,s.

I will first attempt to simplify the questions if that works?

Thanks, s.15,s.1

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Thursday, January 11, 2018 3:03 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Questions for UBCM advisory group  
Hi s.15,s.1

- I think the JCCR is going to find these questions confusing, and I'm not sure myself what you're getting at. Let's discuss further, maybe with s.15, s.19 as well. I want to make sure you get the information you need and make the most of our time with the committee. I'm available for the rest of the afternoon if you want to give me a call.

Thanks,

s.15,s.

19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, January 10, 2018 4:41 PM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Questions for UBCM advisory group  
Hi s.15,s.

As discussed yesterday, I discussed the proposed Questions with s.15, s.19 and with slight revisions to framing suggest the following questions:

- 1) What has your experience been re: zoning and bylaws development and enforcement for medical cannabis production within your respective jurisdictions?
- 2) If you have encountered issues with medical cannabis production in your jurisdiction, what were the issues and can you suggest what tools, resources and supports would have assisted local governments to decrease or eliminate these issues?

Thanks, s.15,s.1

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 PREM:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 GRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: questions regarding forthcoming OICs  
**Date:** Friday, June 15, 2018 16:01:43

---

Hi s.15,s.19

In summary:

- a. Local governments were aware that the feds/BC were moving to allow cannabis to be grown in open fields when AGRI consulted, and this was not of significant concern to them.
- b. We don't need to wait for the fed act to come into force. Licenses are being issued now and the distinction between medical and non-medical cannabis will become meaningless on legalization.

s.13

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, June 15, 2018 3:44 PM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 PREM:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: questions regarding forthcoming OICs

Hi s.15,s.19

I attended two JCCR (Joint Provincial and Local Government Commission for Cannabis Regulation) meetings with the Cannabis Secretariat where I talked to UBCM representatives. In addition, I have had multiple meetings with Ministry of Municipal Affairs and Housing staff and engaged in conversations with a number of stakeholders related to local governance and cannabis regulation. At all of these meetings, I have made it very clear that the proposed *Cannabis Act* will permit open field growing of cannabis. I also relied that the proposed *Cannabis Act* would set out security regulations for open field production i.e. physical barriers (for example walls or fences to prevent unauthorized access). Large scale outdoor growing will likely also require visual monitoring of the entire perimeter at all times and alarms or other intrusion detection systems. At the JCCR meetings, local governments did raise concerns related to open field growing and security, however when explained that home cultivation of up to four cannabis plants would be permitted under the *Cannabis Act*, the risk related to security issues would likely be diminished. In summary, security issues related to outdoor production although mentioned by local government was not their primary concern. With regards to dual licences, the *Cannabis Act* will legalize non-medical cannabis and with this legalization the production of medical and non-medical cannabis will become indivisible, meaning no different will exist between the two, cannabis will be cannabis. Medical cannabis is currently a designated farm use and therefore possibly by default once legalized, non-medical cannabis would be designated as well.s.13

s.13

If you have any additional questions please feel free to contact me. I have been heavily involved in the Cannabis Legalization and Regulation project since Jan 2017 and am well informed of both the provincial direction on this project as well as AGRI's policy creation related to cannabis.

Regards:s.15,s.19

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**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, June 15, 2018 3:09 PM  
**To:** s.15,s.19 PREM:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX

**Subject:** FW: questions regarding forthcoming OICs

Hi s.15,s.19

We just got the tagged order s.15,s.19 will load to SharePoint.

s.13

I am ccing s.15,s.19

s.15,s.19

here and she will respond to your second

question.

s.15,s.

s.15,s.19

---

**From:** PREM:EX

**Sent:** Friday, June 15, 2018 2:52 PM

**To:** s.15,s.19 AGRI:EX

**Cc:** s.15,s.19 PREM:EX

**Subject:** FW: questions regarding forthcoming OICs

Hi s.15,s.1 just checking in on the status of the tagged OIC.

Also had a question on the consultation. When AGRI consulted, were local gov'ts aware that the feds/BC were moving to allow cannabis to be grown in open fields? A couple of years ago, local gov'ts were concerned around public safety when the bunker like production facilities were first approved so I expect they may be more concerned about growing cannabis in open fields.

s.13

Thanks

s.15,s.19

s.15,s.19

---

**From:** PREM:EX

**Sent:** Tuesday, June 12, 2018 11:29 AM

**To:** s.15,s.19 AGRI:EX

**Subject:** RE: questions regarding forthcoming OICs

Hello,

Thank you for R2285, when you post a revised info summary could you please somehow indicate the changes. I didn't have this OIC on my radar but it will be on the July 4<sup>th</sup> agenda. I have placeholders are they still coming in addition to the one mentioned

s.13

below.

Please post what info you can by noon today, we would appreciate the tagged OIC by Friday at noon.

s.15,s.19

Cabinet Operations

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX

**Sent:** Tuesday, June 12, 2018 11:06 AM

**To:** s.15,s.19 PREM:EX

**Subject:** questions regarding forthcoming OICs

Hi s.15,s.

I have posted a draft OIC package to Cab Ops sharepoint. There may be some adjustments to the Cabinet Summary Information document that I can upload tomorrow morning – is that ok?

Secondly, we have another OIC that we hope goes to Cabinet July 4. We do not yet have a tagged order.

Can I post the draft tagged order as part of the OIC pkg to Sharepoint? Any guidance is much appreciated.

Thank you!

Regards,

s.15,s.19

Corporate Governance, Policy & Legislation Branch  
Ministry of Agriculture  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: reg changes  
**Date:** Wednesday, June 6, 2018 15:11:04

---

Oh you're welcome! You're part of the team ☺

The ALR Reg specifies that designated farms uses must not be prohibited by local governments or by First Nations governments (see s. 2(1.1)(a) and (b)). So the authority comes from our ALR Reg itself.

I hope that helps!

s.15

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, June 6, 2018 3:08 PM  
**To:** s.15,s.19 AGRI:EX s.15,s.19  
**Cc:** s.15,s.19 AGRI:EX; AGRI:EX  
**Subject:** Re: reg changes s.15,s.  
Thanks for including me in this 19  
I'm definitely out of the loop.s.13.s.16  
s.13,s.16

Sent from my iPhone

On Jun 6, 2018, at 2:57 PM, s.15,s.19 AGRI:EX <s.15,s.19 :@gov.bc.ca> wrote:

Hi s.15,s.

Thanks for your helpful input today in our telephone meeting.

s.13,s.16

I hope this summary is of assistance!

Cheers,

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, June 6, 2018 2:41 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 M MAH:EX  
**Subject:** FW: reg changes

Hi s.15,s.19  
As I'm new to the regulatory drafting confidentiality, can you respond to s.15,s.19 question below for me?  
Thanks, s.15,s.19 g

---

**From:** s.15,s.19 MAH:EX  
**Sent:** Wednesday, June 6, 2018 2:36 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** reg changes  
Hi s.15,s.19

Thanks for the call and update today s.13

s.13  
s.15,s.19

---

LOCAL GOVERNMENT DIVISION  
MINISTRY OF MUNICIPAL AFFAIRS AND HOUSING  
s.15,s.19



Page 312 of 381 to/à Page 316 of 381

Withheld pursuant to/removed as

s.14

**From:** s.15,s.19 PSSG:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX  
**Subject:** RE: Request for info  
**Date:** Monday, August 28, 2017 16:26:59

---

s.15,s.1  
Thanksg – this is helpful!

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, August 28, 2017 4:26 PM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** FW: Request for info  
Hi s.15,s.

s.15,s.1  
1a has stated that medical marijuana is top of list and to a lesser extent: nurse/ornamental crops, turfgrass and equestrian facilities.

Does this help?

Perhaps if the work “some” was inserted inform of non-food items it would help to clarify that not all non-food items are equally viewed by local governments as problematic.

s.15,s.1  
9

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, August 28, 2017 4:23 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Request for info  
Hi s.15,s.  
1a

Unfortunately I don't have documentation but I have heard representatives of some local governments mention medical marijuana over the last couple of years. At other times and to a lesser extent there has also been mention of nursery/ornamental crops, turfgrass and equestrian facilities.

s.15,s.  
1a

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, August 28, 2017 4:17 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Request for info  
Hi s.15,s.

I have had a follow up question from the Secretariat.

Do you have any documentation as to what non-food items local governments have cited if any?

Thanks, s.15,s.1  
a

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Monday, August 28, 2017 4:09 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Request for info  
Hi s.15,s.  
1a

It is accurate.

Best,

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, August 25, 2017 4:11 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX

**Subject:** Request for info

**Importance:** High

Hi s.15,s.

s.15,s.19 suggested I contact you. I am reviewing a document from the Cannabis Secretariat, they have asked me to check on the accuracy of this sentence.

Can you tell me if this statement is accurate?

Some local governments have in the past been concerned about using valuable agricultural land for production of non-food items, such as cannabis.

Feel free to contact me if you need further details.

Thanks s.15,s.19

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15,s.19

**From:** s.15,s.19 ALC:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Request for input  
**Date:** Friday, December 1, 2017 10:49:14

---

Definitely.

Regards

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, December 1, 2017 10:49 AM  
**To:** s.15,s.19 ALC:EX

**Subject:** RE: Request for input

Okay thanks <sup>s.15,s.19</sup> . As I review the proposed regs if I come across anything that I think might require your input do you mind if I contact you?

Thanks, s.15,s.1

---

**From:** s.15,s.19 ALC:EX  
**Sent:** Friday, December 1, 2017 10:01 AM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Request for input

s.15,s.1

Not sure that the ALC has much to say about the document that we have not already said. Our priorities are:

- 1) Local government should have authority to permit/deny cannabis production in bunker type facilities and /or processing
- 2) The growing of cannabis should be a permitted use in the ALR, but only in greenhouse or field conditions. Bunker type facilities (concrete wall; no natural sunlight) should be permitted only under application to the ALC

Thanks,

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, November 28, 2017 4:26 PM  
**To:** s.15,s.19 ALC:EX  
**Subject:** RE: Request for input

Opps. Sorry about that <sup>s.15,s.19</sup> . I am not sur about attending the meeting tomorrow. I have an app't at that time.

---

**From:** s.15,s.19 ALC:EX  
**Sent:** Tuesday, November 28, 2017 4:23 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Request for input

His.15,s.

No attachment.

However, I am in your office tomorrow from 11 am until 3 pm. Do you want to drop by and discuss.  
<sup>s.15,s.1</sup> is coming to the meeting as is <sup>s.15,s.19</sup> and others.

Regards

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, November 28, 2017 4:13 PM  
**To:** s.15,s.19 ALC:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** Request for input

Hi s.15,s.19

I am sending this request to ALC to invite you to provide any comments or questions on the proposed approach to the federal regulations for Cannabis. I am still reviewing the regulations myself but am more than happy to have a discussion if needed.

The proposed approach to federal regulations for cannabis have been released for consultation (this is not the actual regulation but a reader friendly document that describes the intent of the regs).

Although the deadline for comment is Jan 20<sup>th</sup>, we require a quick turnaround because the Cannabis Secretariat and Ministry of Agriculture will be meeting with Health Canada on Dec 14<sup>th</sup>/15<sup>th</sup> to discuss cannabis production. Therefore, I require a formulated response to the consultation questions and any comments and concerns related to the proposed approach to the regulations before the end of the day December 7th.

I have attached the document. Please review sections that are relevant to your work and return comments to me by Dec 7<sup>th</sup>. Consultation questions I referenced above are listed on pp. 68-69, please review these and provide comments where you are able. All comments or questions should be preceded by the section name, section number and page number.

Please contact me if you have any questions or concerns.

Thanks, s.15,s.  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

s.15,s.19

Hi<sub>19</sub><sup>s.15,s.</sup>

s.15,s.19

- s.15,s.19

Thanks, s.15.s.

**From:** s.15,s.19

Hello All,

Although the deadline for comment is Jan 20<sup>th</sup>, we require a quick turnaround because the Cannabis Secretariat and Ministry of Agriculture will be meeting with Health Canada on Dec 14<sup>th</sup>/15<sup>th</sup> to discuss cannabis production. Therefore, I require a formulated response to the consultation questions and any comments and concerns related to the proposed approach to the regulations before the end of the day December 7<sup>th</sup>.

I have attached the document. Please review sections relevant to your branch/unit and return comments to me by Dec 7<sup>th</sup>. Consultation questions I referenced above are listed on pp. 68-69, please review these and provide comments where you are able. All comments or questions should be preceded by the section name, section number and page number.

Please contact me if you have any questions or concerns.

Thanks, s.15,s.19

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15,s.19

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Withheld pursuant to/removed as

s.14



**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 MAH:EX; s.15,s.19 AGRI:EX  
**Subject:** Re: Request for meeting to review s.12,s.13  
**Date:** Friday, April 13, 2018 13:31:26

---

Please share with s.15,s.19  
9

Sent from my iPhone

On Apr 13, 2018, at 1:13 PM, s.15,s.19 AGRI:EX <s.15,s.19@[gov.bc.ca](mailto:s.15,s.19@gov.bc.ca)> wrote:

I will send what I am able as soon as I receive direction. Unfortunately both s.15, and s.19  
s.15,s.19 s.22 I will put it on my to do list first thing Monday morning.

I know that isn't leaving too much time, but we can have follow up conversation post meeting as well.

s.15,s.19

s.15,s.19

**From:** MAH:EX

**Sent:** Friday, April 13, 2018 11:54 AM

**To:** s.15,s.19 AGRI:EX

**Subject:** RE: Request for meeting to review s.12,s.13

Hi s.15,s.19

That's fine but it will be more difficult to s.12,s.13  
s.12,s.13

s.15,s.19  
9

s.15,s.19

**From:** AGRI:EX

**Sent:** Friday, April 13, 2018 11:21 AM

s.15,s.19

**To:** MAH:EX

**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX

**Subject:** RE: Request for meeting to review s.12,s.13

Hi s.15,s.19

I am not sure if I can send s.12,s.13 s.15,s.19  
s.12,s.13

I was thinking next week as it would be good to move on this sooner rather than later.

s.12,s.13 I will send

an invite shortly through outlook.

Thanks, s.15,s.19

**From:** s.15,s.19

MAH:EX

**Sent:** Friday, April 13, 2018 11:15 AM

**To:** s.15,s.19 AGRI:EX

**Subject:** RE: Request for meeting to review s.12,s.13

Hi s.15,s.19

Please include me, s.15,s.19

When are you thinking? s.12,s.13

s.12,s.13

Thanks

s.15,s.

19

---

**From:** s.15,s.19 AGRI:EX

**Sent:** Thursday, April 12, 2018 3:17 PM

**To:** s.15,s.19 M MAH:EX

**Cc:** s.15,s.19 \AGRI:EX; s.15,s.19 \GRI:EX

**Subject:** Request for meeting to review s.12,s.13

Hi | s.15

AGRI is getting close to s.12,s.13

s.12,s.13

Can you tell me who from your team should be invited to attend? From AGRI we will likely have myself, s.15,s.19 likely someone from our legislation unit and someone from the strengthening farming unit.

Thanks, s.15,s.1

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15,s.19

Page 328 of 381 to/à Page 340 of 381

Withheld pursuant to/removed as

s.14

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX  
**Subject:** RE: Requested review of Policy Decisions Document Volume One  
**Date:** Thursday, August 24, 2017 18:19:25

---

s.15,s.  
19

I'm fine with you submitting the below noting you have ADM approval  
s.15,s.19

*Ministry of Agriculture*

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, August 24, 2017 1:57 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX  
**Subject:** Requested review of Policy Decisions Document Volume One  
Hi s.15,s.19 ,

My apologies for my lack of communication on this assignment. The work has been occurring but I hadn't communicated it to you.

s.13,s.16

Please let me know how you would like to proceed with submitting the suggested changes. I will submit at the end of the day to meet the deadline unless you direct otherwise.  
Again my apologies on not closing the communication loop.

s.15,s.19

To s.15,s.19

As requested, below is AGRI's submission for your request for fact check on the Policy Decisions Document Volume One.

s.13,s.16

s.13,s.16

This paragraph has been jointly developed by staff at AGRI and MAH and is by way of this message approved by AGRI Executive, however may still be undergoing approval by MAH executive.

Thank-you for the opportunity to review the document.

Regards  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Response for Ontario Ministry of Agriculture, Food and Rural Affairs  
**Date:** Friday, December 1, 2017 16:09:22

---

I think this looks fine, I'd ask him if he can share any summary doc he may do to collect the information.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, December 1, 2017 1:24 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** Response for Ontario Ministry of Agriculture, Food and Rural Affairs

Hi s.15,  
s.19

Can you please review my response to John's question. I recognize it is vague but I'm not sure what further information I can give.

Thanks, s.15,s.  
s.19

Hi John,

Thus far the Ministry of agriculture in B.C. has completed the following activities as it relates to cannabis production on agricultural land.

s.13,s.16

s.15,s.19

Hi all:

I'm curious how different provinces are planning to deal with the issue of cannabis production on agricultural land, anticipating Federal approval of recreational cannabis in mid 2018. We are being asked to provide some direction and thoughts in Ontario.

I know a couple of provinces had formal positions on medical cannabis --- but wondering what you may be thinking in terms of recreational cannabis production.

We already have a number of both licensed and designated growers producing medical cannabis on agricultural land in Ontario. We also have a number of licensed growers located on industrial lands in urban areas.

If you have any thoughts or comments you are willing to share, that would be great.

Thanks!

John.

John Turvey, BA, MPI, MCIP, RPP

Policy Advisor (Land Use Planning)

Land Use Planning and Stewardship Unit

Food Safety and Environmental Policy Branch

Ontario Ministry of Agriculture, Food and Rural Affairs

Ph: (519) 826-3555

Email: [john.turvey@ontario.ca](mailto:john.turvey@ontario.ca)

s.15.s.19 Senior Policy Analyst



**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Response to Alberta  
**Date:** Friday, December 1, 2017 16:12:06

---

I'd add a sentence that says:

I am not familiar with any other provincial taxes that may or may not apply to medical marihuana, I would suggest that you contact our Ministry of Finance [insert a contact number/email if you have one?] to better understand other applicable taxes and rates.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, December 1, 2017 1:47 PM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** Response to Alberta  
Hi s.15,s.

Can you review my response to Nicole's question below.

Thanks, s.15,s.19

Hi Nicole,

In 2015, the Province amended the Agricultural Land Reserve Use, Subdivision and Procedure Regulation (ALRUSPR) under the ALCA to include production of medical cannabis on the agricultural land reserve (ALR) land as a designated farm use, provided it was produced according to the *Marihuana for Medical Purposes Regulations* (MMPR). At this point, cannabis was considered an agricultural product. Land within the Agricultural Land Reserve does qualify for certain land tax exemptions.

In 2014, the Classification of Land as a Farm Regulation (CLFR) under the *Assessment Act*, was amended to specifically exclude from the definition of "qualifying agricultural use" (QAU) the production of "any substance set out in item...17 [*cannabis*] of the Schedule to the *Narcotic Control Regulations under the Controlled Drugs and Substances Act* (Canada), other than the production of industrial hemp in accordance with the Industrial Hemp Regulations under that Act" This had the effect of excluding medical cannabis production facilities from classification as farms and qualifying for reductions in tax that are available in respect of farms and farmers including property tax, property transfer tax, fuel tax, carbon tax and sales tax.

At this time no policy decisions have been made for non-medical cannabis related to taxation or agricultural land use, however policy analysis is underway.

s.15,s.19

---

I am currently compiling research on how medical cannabis is being assessed and taxed in other provinces. If you could please provide additional information on the following:

- How are you treating medical cannabis, is it considered an agricultural product or something else?
- Is the whole (or part of) the facility containing medical cannabis assessed and taxed and if so, what is the rate?
- Do you know if there is a plan to assess and tax recreational cannabis production facilities differently from medical cannabis once legalization takes effect, or will they be treated the same?

I appreciate you taking the time to answer my questions and look forward to your responses.

Thank you,

**Nicole Ng-Muk-Yuen**



Policy Analyst | Corporate Strategic Policy  
Corporate Strategic Service Division | Alberta Municipal Affairs  
18<sup>th</sup> Floor, 10155-102 Street | Edmonton, AB T5J 4L4  
Tel: 780-644-3074  
**s.15,s.19**

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
**s.15,s.19**

**From:** s.15,s.19 MAH:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Revised responses re: marijuana  
**Date:** Wednesday, December 13, 2017 11:06:56

---

Lovely – thank you

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, December 13, 2017 11:05 AM  
**To:** s.15,s.19 MAH:EX  
**Subject:** RE: Revised responses re: marijuana  
Hi s.15,s.19

Just a minor edit below in question 2.

s.15,s.1

---

**From:** s.15,s.19 MAH:EX  
**Sent:** Wednesday, December 13, 2017 9:59 AM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** Revised responses re: marijuana s.15,s.  
Hi s.15,s.1. Thanks again for all your help with this. Cheers, 19

**1. Can the municipality prevent facilities from being developed? The Province would like to have a number of facilities for the jobs and economic activity.**

s.13,s.16

s.13,s.16

**2. Is it the Ministry of Agriculture or the ALC that permits activity on the ALR with the municipality having little say?**

s.13,s.16

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX; s.15,s.19  
s.15 AGRI:EX  
**Subject:** RE: Signed AGRI policy DN's  
**Date:** Wednesday, May 30, 2018 13:33:31

---

Hi s.15,s.  
19

We will have the drafting instructions ready shortly after 2 today, we are just circulating to our policy unit for comment.

s.12,s.13,s.14

s.15,s.19

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Wednesday, May 30, 2018 11:12 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Signed AGRI policy DN's

Great – s.15,s.19 do you have an ETA on when those drafting instructions will be ready (just  
s.12,s.13,s.14

Thanks,  
s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, May 30, 2018 10:41 AM  
**To:** s.15,s.19 PSSG:EX; s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Signed AGRI policy DN's

Thank you very much for your assistance s.15,s.19. The team is working on the policy approach to send forward for drafting support. I have included s.15,s.19 so she is aware of your offer.

s.15,s.19

Ministry of Agriculture  
s.15,s.19

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Wednesday, May 30, 2018 9:39 AM

**To:** s.15,s.19 AGRI:EX; s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Signed AGRI policy DN's

Hi s.15, – Please let me know when s.12,s.13,s.14  
s.12,s.13,s.14

Thanks,  
s.15,s.19

---

**From** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, May 29, 2018 8:29 PM  
**To:** s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 PSSG:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Signed AGRI policy DN's

s.15,s.  
.19  
s.12,s.13

s.15,s.19

Ministry of Agriculture  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** RE: Soil based production\_Meeting Minutes  
**Date:** Friday, May 18, 2018 07:58:33

---

Thanks, s.15,s.1  
I wasn't aware of the s.12,s.13  
s.12,s.13

s.15,s  
19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, May 17, 2018 3:53 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX  
**Subject:** RE: Soil based production\_Meeting Minutes  
Hi s.15,s.  
19

I've inserted responses into your text below.

s.15,s.1

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, May 17, 2018 1:11 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX s.15,s.19 AGRI:EX  
**Subject:** RE: Soil based production\_Meeting Minutes  
Hi s.15,s.

s.12,s.13

---

**From** s.15,s.19 AGRI:EX  
**Sent:** Thursday, May 17, 2018 12:22 PM  
**To** s.15,s.19 \AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Soil based production\_Meeting Minutes  
Hi s.15,s.

Thanks for sending this. It appears the whole conversation was based on an incorrect assumption  
s.13,s.14,s.16

s.13

Thanks s.15,s.19

From s.15,s.19

AGRI:EX

Sent: Thursday, May 17, 2018 10:33 AM

To: s.15,s.19 AGRI:EX

Subject: RE: Soil based production\_Meeting Minutes

Hi s.15,s ,

s.13

s.15,s

10

From: s.15,s.19

AGRI:EX

Sent: Wednesday, May 16, 2018 5:16 PM

To: s.15,s.19, s.15,s.19 AGRI:EX; s.15,s.19

AGRI:EX; s.15,s.19

AGRI:EX; s.15,s.19

AGRI:EX; s.15,s.19

AGRI:EX; s.15,s.19

AGRI:EX; s.15,s.19

AGRI:EX; s.15,s.19

AGRI:EX; s.15,s.19

AGRI:EX; s.15,s.19

AGRI:EX; s.15,s.19

AGRI:EX

Subject: Soil based production\_Meeting Minutes

Hello All,

Thank-you for your attendance today. I will send out another meeting invite shortly. Please review the attached meeting minutes. Turn on track changes and make additions edits if needed and return to me.

Thanks s.15,s.19

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

s.15,s.19



**From:** s.15,s.19 | [MAH:EX](#)  
**To:** s.15,s.19 | [AGRI:EX](#); s.15,s.19 | [AGRI:EX](#)  
**Subject:** RE: Sorry one more question  
**Date:** Wednesday, December 13, 2017 11:25:19

---

Lovely thank you

---

**From:** s.15,s.19 | [AGRI:EX](#)  
**Sent:** Wednesday, December 13, 2017 10:59 AM  
**To:** s.15,s.19 | [MAH:EX](#); s.15,s.19 | [AGRI:EX](#)  
**Subject:** RE: Sorry one more question  
See below in red.

---

**From:** s.15,s.19 | [MAH:EX](#)  
**Sent:** Wednesday, December 13, 2017 8:48 AM  
**To:** s.15,s.19 | [AGRI:EX](#); s.15,s.19 | [AGRI:EX](#)  
**Subject:** Sorry one more question  
Here is the question MFIN asked:

Is it the Ministry of Agriculture or the ALC that permits activity on the ALR with the municipality having little say? Municipalities permit. In doing so, municipalities interpret the ALCA and its regulations. **s.13** Unless a municipality refers a permit application to the ALC, the ALC will have no knowledge of it.  
Wondering about your response:

s.13

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** RE: Status quo  
**Date:** Tuesday, April 3, 2018 13:39:54  
**Attachments:** L"S EDIT OF Status Quo Option with implications.docx

---

Hi s.15,s.19 –  
1a

Looks good to me! I attach a very lightly edited version back for you in case you find it helpful ☺

Thanks,

s.15,

s.19

---

**From:** s.15,s.19 AGRI:EX

**Sent:** Tuesday, April 3, 2018 1:30 PM

**To:** s.15,s.19 AGRI:EX

**Subject:** Status quo

Hi s.15,  
1a

I have attached a word doc outlining what status quo would look like.

Can you please review and provide input?

Thanks, s.15,s.1

s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** AGRI:EX  
**Subject:** RE: Summary of today's greenhouse desingation meeting  
**Date:** Tuesday, May 29, 2018 20:14:36

---

Thanks s.15,s. my understanding of our preliminary meeting today was to identify the types of questions, rather than identify who we in the greenhouse industry to consult with. Are the specific questions to be asked at #2? Fill type and percentage, and Concrete coverage percentage?  
s.15,s.19

Ministry of Agriculture  
s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, May 29, 2018 5:16 PM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX  
**Subject:** Summary of today's greenhouse desingation meeting  
Hi s.15,s

In summary the outcomes of today's meeting.

Action Items/ Next steps:

- 1) All agreed that industry consultation was needed and should include the following:
  - a. BC Vegetable Marketing Commission
  - b. BC Greenhouse Growers' Association
  - c. Flowers Canada Growers
  - d. United Flower Growers Co-operative Association
  - e. Cannabis Associations should also be included ( consulting with associations at the national level may provide a more organized association)

- i. Canadian Medical Cannabis Council
- ii. Cannabis Canada Association
- iii. Cannabis Growers of Canada
- f. Greenhouse manufacturers

- i. BW Global
- ii. Prince Greenhouse
- g. UBCM

- 2) Items to be consulted on include the following:
  - a. Fill type and percentage
  - b. Concrete coverage percentage

s.12,s.13

Note: concerns were raised that upon initiating consultation with Greenhouse industry questions would be asked as to purpose for consultation, greenhouse industry response would no tbe positive. More detail will follow in meeting minutes which I will type and distribute tomorrow

**Thanks,** s.15,s.  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** AGRI:EX  
**Subject:** RE: Terms of Reference for Cannabis Production Sub-working group  
**Date:** Friday, December 1, 2017 09:26:51

---

I would add a sentence that states that this working group will coordinate with the economic development working group to ensure there is cross over planning accordingly.

s.15,s.19

Ministry of Agriculture

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, December 1, 2017 9:26 AM  
**To:** s.15,s.19 AGRI:EX  
**Subject:** RE: Terms of Reference for Cannabis Production Sub-working group  
I've added it in this bullet  
s.13

Good?

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, December 1, 2017 9:25 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Terms of Reference for Cannabis Production Sub-working group  
Then I would reference in this working group so s.15, can see it.  
s.15,s.19

Ministry of Agriculture

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Friday, December 1, 2017 8:58 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Terms of Reference for Cannabis Production Sub-working group  
HI s.15,s.19

There is a sub-working group specifically for economic development. If that is adequate I will leave the economic development point off of this ToR.

Thanks, s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, November 30, 2017 4:35 PM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Terms of Reference for Cannabis Production Sub-working group  
Looks good s.15,s.19 one more scope piece I would add is to also include the policy scope on the economic development opportunities s.13  
s.15,s.19

Ministry of Agriculture

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Thursday, November 30, 2017 4:31 PM

**To:** s.15,s.19 AGRI:EX;s.15,s.19 AGRI:EX  
**Subject:** Terms of Reference for Cannabis Production Sub-working group  
Hi ,s.15,s.19

I just received an email from s.15,s.19 she received a strong push from executive to initiate the production Sub working group before the end of December. s.15,s.19 asked me to send her the terms of reference ASAP. I have attached them here for your review. I need your feedback by tomorrow if possible. Sorry for the quick turnaround we were supposed to have more time on this. I've highlighted the sections to focus on. The other sections are copy and paste from other Sub-working group ToR.

Thanks, s.15,s.19  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19

From: s 15 s PSSG:EX  
To: s 15 s AGRI:EX  
Subject: RE: Today's discussion  
Date: Thursday, January 25, 2018 14:03:56

Hi s 15

Here are the remaining, unanswered questions. Can you please highlight which ones are the priority/crucial questions, as well as any that I can remove from our spreadsheet?

Thanks,

s 15

Ministry/Org	Theme	Sub-theme	Related Section	Consultation Question	Question	Priority	Answer/Response	Status
s.13								
AGRI	Licences/ Authorizations	Licenced Activities	2	n/a				Open
AGRI	Licences/ Authorizations	Location	2.3.3	n/a				Open
AGRI	Licences/ Authorizations	Location	2.3.3	n/a				Open
AGRI	Licences/ Authorizations	Location	2.3.3	n/a				Open
AGRI	Licences/ Authorizations	Physical Security	2.3.4	n/a				Open
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a				Open
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a				Open
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a				Open
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a				Open
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a				Open
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a				Open
AGRI	Licences/ Authorizations	Good Practices	2.3.6	n/a				Open
AGRI	Licences/ Authorizations	Record Keeping and Reporting	2.3.7	n/a				Open
AGRI	Products/ Product Standards	Product Classes	5.2	n/a				Open
AGRI	Packaging & Labelling		6	n/a				Open
AGRI	Packaging & Labelling		6	n/a				Open
AGRI	Medical Access	Information Sharing	7.6	n/a				Open

From: s 15 s AGRI:EX  
Sent: Thursday, January 25, 2018 1:21 PM  
To: s 15 s PSSG:EX  
Subject: RE: Today's discussion

For sur **s.1** I'm available now if you are.

---

**From:** **s.1** **s.1** PSSG:EX  
**Sent:** Thursday, January 25, 2018 12:55 PM  
**To:** **s.1** **s.1** AGRI:EX  
**Subject:** RE: Today's discussion  
Hi **s.1**

Do you have some time for a phone call this afternoon? I think that we might be able to answer some of the federal regulations questions based on what we heard, but I think it'd be best to go over it together?  
Let me know.

Thanks,

**s.1**

---

**From:** **s.1** **s.1** AGRI:EX  
**Sent:** Wednesday, January 24, 2018 4:42 PM  
**To:** **s.1** **s.1** PSSG:EX  
**Cc:** **s.1** **s.1** PSSG:EX  
**Subject:** Today's discussion  
Hi **s.1**

I thought today's discussion went very well. I'll type up my notes and submit them to **s.1** or him to add to the tracking document.

I have been thinking about talking to my executive about expanding some of the policy work that might need to be done around farm practices, but I'm going to think about this a bit more. If you have any ideas or thoughts around today's discussion please let me know.

Thanks again **s.1**

**s.1** **s.1**

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch

**s.1**, **s.1**

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Unintended consequence s.13  
**Date:** Wednesday, May 30, 2018 09:21:17

---

I just spoke briefly with s.15,s.19 and she said the same to me as s.15,s.19 has a note on timing issues up with s.15,s.19 and is seeking direction. Although the note is about th s.12,s.13 the issues are the same in that we need to do the policy analysis, consult, and then move forward. So we can stand down until we hear anything further from s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, May 30, 2018 9:19 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Unintended consequence - s.13 ;

Thanks for confirming that this is a concern and risk. Is there anything further I should do about it at this stage, or simply leave it with both you two tireless leaders s.15,s.19 o communicate it up the chain?

s.1  
5 s

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, May 30, 2018 8:50 AM  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Re: Unintended consequence s.13 s.15,s.

You articulated one of the concerns I heard from MAH that I only touched on in my email to s.13,s.16

Sent from my iPhone

On May 30, 2018, at 8:40 AM s.15,s.19 AGRI:EX s.15,s.19 @gov.bc.ca> wrote:

Hi all –

Last night when continuing to think about this s.13 I realized that there's an unintended consequence that may arise as an implication if we are s.13



s.13

Just voicing this now in the hopes that it will be helpful...  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19



s.15,s.19

Ministry of Agriculture  
s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: URGNET: Agenda & Materials - DMWG Cannabis - March 7  
**Date:** Tuesday, March 6, 2018 16:12:20

---

s.15,s.19 , the following are proposed speaking bullets for s.13 DM meeting tomorrow:

s.12,s.13

s.15,s.19

Ministry of Agriculture

s.15,s.19

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, March 6, 2018 1:04 PM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: URGNET: Agenda & Materials - DMWG Cannabis - March 7

I was unaware you had a DMs' meeting on this tomorrow or that they were looking for you to do an update. We haven't been told about this through either the Cannabis Secretariat, or the ADMs' committee (unless we're missing something).

You are right that the update would be on the 3 issues you raised previously. Our main issue is the need to get a process to receive direction.

s.15,s. – can you get key points developed for s.15 by end of day today? Also send along the draft cabinet powerpoint as background and for s.15, input.

We'll also follow up with PSSG to try and get better alignment with the DMs' committee.

---

**From:** s.15,s.19 AGRI:EX  
**Sent:** Tuesday, March 6, 2018 12:38 PM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** URGNET: Agenda & Materials - DMWG Cannabis - March 7

s.15,s.19

s.15,s.19 said that they were going to address the agriculture issues tomorrow so I see an AGRI update is on the agenda. Are either of you aware of any particular update I am supposed to give, or is it to revisit the 3 AGRI policy issues that I have raised previously. If so, can you resend the info on the 3 policy areas that you provide before or any background I will need for this meeting tomorrow? Might the three issues best be found in the briefing we did for s.15,s.19 Issues being:  
s.12,s.13

s.15  
e 1 can you print materials?

---

**From:** s.15,s.19 PSSG:EX  
**Sent:** Tuesday, March 6, 2018 12:32 PM  
**To:** s.15,s.19 JAG:EX; s.15,s.19 PRFM:EX; s.15,s.19 LDB:EX; s.15,s.19  
**MAH:EX:** s.15,s.19 AGRI:EX; s.15,s.19 MMHA:EX; s.15,s.19 PREM:EX;  
s.15,s.19 PSSG:EX; s.15,s.19 PSSG:EX; s.15,s.19 FIN:EX; s.15,s.19 LCLB:EX;  
s.15,s.19 PSSG:EX; s.15,s.19 AG:EX; s.15,s.19 GCPE:EX; s.15,s.19 MAH:EX; s.15,s.19  
s.15,s.19 PSSG:EX  
**Cc:** s.15,s.19 JAG:EX; s.15,s.19 PSSG:EX; s.15,s.19 PSSG:EX; s.15,s.19 JAG:EX;  
s.15,s.19 PREM:EX; s.15,s.19 MAH:EX; s.15,s.19 AGRI:EX; s.15,s.19 MMHA:EX;  
s.15,s.19 PSSG:EX; s.15,s.19 GCPE:EX; s.15,s.19 FIN:EX; s.15,s.19 LCLB:EX  
**Subject:** Agenda & Materials - DMWG Cannabis - March 7

Good afternoon,

Please see attached agenda and materials for Wednesday, March 7<sup>th</sup> @ 7:30am DMWG s.13  
s.13

Thank you

s.15,s.19

**Office of the Deputy Solicitor General**

Ministry of Public Safety and Solicitor General  
s.15,s.19

Page 367 of 381 to/à Page 368 of 381

Withheld pursuant to/removed as

s.14

**From:** s.15,s.19 MAH:EX  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Revised answer for review  
**Date:** Wednesday, December 13, 2017 11:41:08

---

**Hope this works?**

**2. Is it the Ministry of Agriculture or the ALC that permits activity on the ALR with the municipality having little say?**

s.13,s.16

**From:** s.15,s.19 AGRI:EX  
**Sent:** Wednesday, December 13, 2017 10:59 AM  
**To:** s.15,s.19 MAH:EX; s.15,s.19 AGRI:EX  
**Subject:** RE: Sorry one more question  
See below in red.

---

**From:** s.15,s.19 MAH:EX  
**Sent:** Wednesday, December 13, 2017 8:48 AM  
**To:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Sorry one more question

Here is the question MFIN asked:

Is it the Ministry of Agriculture or the ALC that permits activity on the ALR with the municipality having little say? Municipalities permit. In doing so, municipalities interpret the ALCA and its regulation s.13 . Unless a municipality refers a permit application to the ALC, the ALC will have no knowledge of it.

Wondering about your response:

s.13,s.16

s.13,s.16

Thanks!

---



**From:** s.15,s.19 MAH:EX  
**To:** s.15,s.19 AGRI:EX  
**Subject:** Revised responses re: marijuana  
**Date:** Wednesday, December 13, 2017 09:58:38

---

Hi <sup>s.15,s.19</sup><sub>1a</sub>. Thanks again for all your help with this. Cheers, <sup>s.15,s.19</sup>

**1. Can the municipality prevent facilities from being developed? The Province would like to have a number of facilities for the jobs and economic activity.**

s.13,s.16

**2. Is it the Ministry of Agriculture or the ALC that permits activity on the ALR with the municipality having little say?**

s.13,s.16

s.13,s.16

**From:** s.15,s.19 [AGRI:EX](#)  
**To:** s.15,s.19 [AGRI:EX](#)  
**Subject:** Revite/Engagement Summary  
**Date:** Tuesday, March 20, 2018 15:23:26

---

Hi <sup>s.15,s.1</sup><sub>9</sub> - as discussed, here is a summary of the revitalization and engagement, including some sentences on cannabis. If you would like anything else, or any other specific things added, please let me know.

s.15,s.  
<sup>1a</sup>

---

s.13 [mandate letter](#) on July 18, 2017 included the priority to “revitalize the Agricultural Land Reserve and the Agricultural Land Commission”. On January 4, 2018 s.13

s.13 announced the members of an independent committee to lead this revitalization, through an authentic and meaningful consultation process with stakeholders and British Columbians. Stakeholder engagement includes: sharing a consultation paper to seek opinions and feedback; hosting nine regional stakeholder consultation meetings (which have concluded); and [an online consultation process](#), including a survey, which is available until April 30, 2018.

The Committee will use the input it receives during the engagement process to develop recommendations for the provincial government's consideration. The recommendations may include changes to the current legislative, regulatory, and administrative framework to revitalize the ALR and the ALC. Any legislative changes that support the revitalization of the commission and the reserve are targeted for late 2018 or early 2019. During consultations and the engagement process, it is expected that the Committee will receive comments on the outcomes of cannabis crops in the province. It is also expected that the Committee will mention cannabis in their interim and/or final reports.

On March 19, 2018 the provincial government published a [news release](#) titled “Halfway mark hit for public engagement on revitalization of the ALR”.

**From:** s.15,s.19 [AGRI:EX](#)  
**To:** s.15,s.19 [AGRI:EX](#)  
**Subject:** SASK \_ FW: CAP Eligibility - Cannabis  
**Date:** Friday, March 9, 2018 08:48:08

---

**From:** Seidler, Morgan AG [<mailto:morgan.seidler@gov.sk.ca>]  
**Sent:** Friday, March 9, 2018 7:37 AM  
**To:** s.15,s.19 [AGRI:EX](#)  
**Cc:** Loewen, David AG; Moss, Robert AG  
**Subject:** RE: CAP Eligibility - Cannabis  
Hi s.15,s.

s.16

Give me a call if you would like to discuss further.

Thank you.

Morgan Seidler

Government of Saskatchewan

Policy Analyst

Policy Branch, Ministry of Agriculture

302 - 3085 Albert Street

Regina, Canada S4S 0B1

Bus: 306-787-7990

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----- Forwarded message -----

From: s.15,s.19 [@gov.bc.ca](#)

Date: Thu, Mar 8, 2018 at 12:20 PM -0600

Subject: CAP Eligibility - Cannabis

To: "Lesiuk, Mike (AGR)" <[Mike.Lesiuk@gov.mb.ca](mailto:Mike.Lesiuk@gov.mb.ca)>, "Bourgeois, Ryan (DAAF/MAAP)" <[Ryan.Bourgeois@gnb.ca](mailto:Ryan.Bourgeois@gnb.ca)>, "MacDonald, Cindy" <[cindymacdonald@gov.nl.ca](mailto:cindymacdonald@gov.nl.ca)>, "Alexandra Poirier" <[alexandra.poire@mapaq.gouv.qc.ca](mailto:alexandra.poire@mapaq.gouv.qc.ca)>, "Amy Rutgers Kelly" <[Amy.Rutgers-Kelly@ontario.ca](mailto:Amy.Rutgers-Kelly@ontario.ca)>, "Basia Florio" <[Basia.florio@ontario.ca](mailto:Basia.florio@ontario.ca)>, "Bobby Cameron" <[bcameron@gov.pe.ca](mailto:bcameron@gov.pe.ca)>, "Brenda McKay" <[brendan.mckay@ontario.ca](mailto:brendan.mckay@ontario.ca)>, "Carla (New)" <[clmillar@gov.pe.ca](mailto:clmillar@gov.pe.ca)>, "cmmorrison@gov.pe.ca" <[cmmorrison@gov.pe.ca](mailto:cmmorrison@gov.pe.ca)>, "Darren Chase" <[Darren.Chase@gov.ab.ca](mailto:Darren.Chase@gov.ab.ca)>, "Loewen, David AG" <[david.loewen@gov.sk.ca](mailto:david.loewen@gov.sk.ca)>, "Ernest Walker" <[ernest.walker@novascotia.ca](mailto:ernest.walker@novascotia.ca)>, "Laureen Kennedy" <[Laureen.Kennedy@gov.ab.ca](mailto:Laureen.Kennedy@gov.ab.ca)>, "Mathew Ball" <[matthew.ball@gov.yk.ca](mailto:matthew.ball@gov.yk.ca)>, "Sarah-Sophie Julien" <[Sarah-Sophie.Julien@mapaq.gouv.qc.ca](mailto:Sarah-Sophie.Julien@mapaq.gouv.qc.ca)>, "Wendy McCormick"

<[wendy.mccormick@gov.ab.ca](mailto:wendy.mccormick@gov.ab.ca)>

Cc: "'Carnegie, Wendy (AGR)'" <[Wendy.Carnegie@gov.mb.ca](mailto:Wendy.Carnegie@gov.mb.ca)>, "'Arrus, Katia (AGR)'" <[Katia.Arrus@gov.mb.ca](mailto:Katia.Arrus@gov.mb.ca)>, "'Lalla, Mike (AGR)'" <[Mike.Lalla@gov.mb.ca](mailto:Mike.Lalla@gov.mb.ca)>

Hello all,

We are wondering the status of other PTs decision making related to cannabis eligibility under CAP designated programs, especially after the FPT DM Retreat. To date, BC has not made any decisions in these areas.

The questions are:

- Have you made a decision to include, exclude or selectively restrict eligibility of recreational cannabis in CAP designated programs?
- If you have made a decision to include, what types of designated programs are eligible?
- Will hemp receive a renewed or increased focus, if so in what areas?
- Are you aware of any plans related to cannabis in BRM and/or other insurance-type products that are offered?

s.12,s.13

Thanks in advance,

s.15,s.19

Corporate Governance, Policy & Legislation Branch  
Ministry of Agriculture  
Government of British Columbia

s.15,s.19

**From:** s.15,s.19 [AGRI:EX](#)  
**To:** s.15,s.19 [AGRI:EX](#)  
**Cc:** s.15,s.19 [AGRI:EX](#); s.15,s.1 [AGRI:EX](#) s.15,s.19 [AGRI:EX](#); s.15,s.19 [AGRI:EX](#) s.15,s.19  
**Subject:** [AGRI:EX](#) s.15,s.19 [AGRI:EX](#)  
**Date:** speaking points for DM Cannabis WG  
Tuesday, January 9, 2018 10:07:11

---

s.15,s.

<sup>16</sup> We are seeking guidance from the DM's Cannabis WG on how to proceed on the three agriculture related policy issues that ADM's agreed in December to move on now rather than in July.

The three policy issues are as follows:

s.12,s.13

Let me know if you would like anything clarified.

s.15,s.19

Ministry of Agriculture

Ph s.15,s.19

Email s.15,s.19 [:@gov.bc.ca](mailto:s.15,s.19@gov.bc.ca)

**From:** s.15,s.19 PSSG:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** Stakeholder input on small-scale production  
**Date:** Wednesday, November 15, 2017 09:54:03  
**Attachments:** CCABC Submission The Real Faces of Craft Cannabis Aug9-2016 Final.pdf

---

Hi s.15,s.19 – As discussed, here is the link to the site where all of the stakeholder submissions are posted, and a list of those that address cultivation.

<http://engage.gov.bc.ca/BCcannabisregulation/read-stakeholder-submissions/>

***Cannabis Commerce Association (CCA)***

***City of Kimberley***

***City of Nelson***

***Craft Cannabis Association of B.C. (CCABC)***

***Kootenay Outdoor Producer Co-Op***

***Levity Solutions***

***Regional District of Central Kootenay (RDCK)***

***The Kootenay's Medicine Tree Medical Cannabis Dispensary***

I've also attached a second document from the Craft Cannabis Association of BC that we got from the federal secretariat.

I'll be in touch again once the federal discussion paper is released.

s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 AGRI:EX; s.15,s.1 AGRI:EX; s.15,s.19 AGRI:EX  
**Subject:** UBCM cannabis review: local government consultation  
**Date:** Wednesday, June 7, 2017 12:25:54  
**Attachments:** Marijuana Survey Report-2017-05.pdf

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Hi s.15,s.

Re: Cannabis stakeholder groups – UBCM

UBCM has completed analysis of local government feedback to a survey on marijuana legalization and regulation. (The survey questions and analysis are included in the attached report).

The responses indicate a need for meaningful provincial consultation with local governments, as well as concern regarding the potential download of duties from federal and provincial government onto local governments.

During the response period (March 29 – April 28), UBCM received 57 replies to the survey, which asked local government senior staff members and elected officials to describe their actions and concerns related to medical and recreational marijuana.

One of the most cited concerns was the potential for a transfer of responsibilities to local governments without accompanying funding from other orders of government.

When asked to indicate their three primary concerns regarding a legalized marijuana regime, 78.9% of respondents selected “downloading of duties onto local governments” as a concern. Many respondents were also concerned with the potential distribution of revenue, and the necessity for local governments to receive a share, especially if they are to assume new responsibilities. The need for adequate funding is consistent with UBCM resolution 2016-A3, requesting that a portion of any future federal or provincial tax collected through marijuana sales and distribution be shared with local governments.

The lack of communication and consultation between federal and provincial orders of government and local governments was also apparent, with only 7.2% of respondents having been directly consulted by the federal government, federal Task Force on Cannabis Legalization and Regulation, or the provincial government. Many respondents refrained from answering some of the survey questions due to a lack of federal/provincial communication.

The legalization of marijuana has become an emerging issue for BC local governments. UBCM will use information obtained as part of its survey in conjunction with policy set by the membership (resolutions 2016-A2 and 2016-A3), to help shape its advocacy on behalf of local governments.

Thanks, s.15,s.1  
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s.15,s.19

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**Ministry of Agriculture**  
s.15,s.19



**From:** s.15,s.19 [AGRI:EX](#)  
**To:** s.15,s.19 [AGRI:EX](#); s.15,s.19 [AGRI:EX](#)  
**Cc:** s.15,s.19 [AGRI:EX](#)  
**Subject:** Unintended consequence s.13  
**Date:** Wednesday, May 30, 2018 08:40:34  
**Attachments:** [image001.jpg](#)

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Hi all –

Last night when continuing to think about this: s.13 realized that there's an unintended consequence that may arise as an implication if we s.13 s.13

Just voicing this now in the hopes that it will be helpful...  
s.15,s.19

Ministry of Agriculture | Corporate Governance, Policy and Legislation Branch  
s.15,s.19



**From:** s.15,s.19 PSSG:EX  
**To:** s.15,s.19 AGRI:EX  
**Cc:** s.15,s.19 PSSG:EX  
**Subject:** Your follow-up questions for the federal government  
**Date:** Friday, February 23, 2018 13:45:19

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Hi s.15,s.19, s.15,s.19 passed on your follow-up questions and I am writing to seek clarification before I send them on to the federal government.

1) Will the province have any ability to determine what type of production will be permitted in the province (e.g. prohibiting open field production)?

NOTE: In an AGRI PT discussion group, Manitoba indicated that HC had told them they would be able to determine what types of production would be allowed in the province. As this was not the message we received I'd like to clarify whether or not this is the case.

s.13,s.14,s.16

2) Certified Organic Associations of British Columbia (COABC) Accreditation Board (AB) has had interest from several of their Certifying Bodies (CB) to certify cannabis. Would anything preclude COABC from offering certification to organic cannabis growers? Is there anything that COABC would need to do under federal regulations prior to beginning to certify growers?

This one seems like a question for COABC's lawyers rather than the federal government, but maybe I'm not understanding the question. Also, I think you would need to provide more info about COABC's certification process before anyone could answer it. E.g., does COABC take possession of the product in question? If so, would it be more than 30 grams? What would COABC do with the product? Perhaps we could chat about this one.

Thanks.  
s.15,s.19

....., Cannabis Legislation and Regulation | Policing and Security Branch  
Ministry of Public Safety and Solicitor General | Cell: s.15,s.19

**From:** s.15,s.19 AGRI:EX  
**To:** s.15,s.19

**Subject:** Zoning for cannabis link  
**Date:** Monday, April 30, 2018 14:32:57

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As discussed.

[https://www.gov.mb.ca/mr/land\\_use\\_dev/pubs/zoning\\_for\\_cannabis\\_guide.pdf](https://www.gov.mb.ca/mr/land_use_dev/pubs/zoning_for_cannabis_guide.pdf)

**Local governance and cannabis production in the ALR - Discussion**

Scheduled: Monday, Apr 30, 2018 from 1:00 PM to 3:00 PM

Location: Ministry of Agriculture, 808 Douglas Street, 1st floor boardroom and by telecom: 1-877-353-9184; Conf/Participant ID: s.15

Invitees: s.15,s.19  
s.15,s.19

Sent from my iPhone