



**CANNABIS
TRADE ALLIANCE
of CANADA**

Rosy Mondin

Executive Director

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October 23, 2017

The Honourable Mike Farnworth, M.L.A.
Minister of Public Safety and Solicitor General
Room 128 - Parliament Buildings
Victoria, BC V8V 1X4

via email

Dear Minister Farnworth,

I am writing to you on behalf of the Cannabis Trade Alliance of Canada to request a meeting to discuss the provincial policy implications of the federal government's legislation to legalize cannabis in Canada.

Our organization appreciated speaking with you and ministry staff within the Legalization and Regulation Secretariat at the recent convention for the Union of BC Municipalities.

As we discussed, our organization has been involved in working with legislators and regulators across Canada to aid governments with developing a safe, secure, and ethical cannabis industry across the country. We were pleased to have our recommendations included in the federal Task Force report and have consistently been consulted on policy matters by Health Canada staff.

The Cannabis Trade Alliance of Canada represents a wide spectrum of stakeholders in the cannabis industry, and we would appreciate the opportunity to meet with you at your earliest convenience. We would be happy to avail ourselves to meet in either Victoria or Vancouver as soon as your schedule permits.

Thank you for your time. I can be reached directly at 1-604-346-8118.

Kindest regards,

Rosy Mondin, Executive Director
Cannabis Trade Alliance of Canada



Cannabis Commerce Association of Canada

Greetings,

I write to you today on behalf of the Craft Cannabis Association of Canada (CCAC), a national, nonpartisan, not-for-profit trade association representing the Canadian “craft cannabis” business sector. CCAC’s members include licensed dispensaries, medical cannabis producers, value-added processors, and a number of professionals (e.g. insurance brokers, accountants, etc.) who offer business services to cannabis businesses.

First, let me congratulate you on your election to office- our members are excited to work with you, regardless of political affiliation. CCAC has member businesses across British Columbia, and there are no doubt hundreds, if not thousands, of individuals employed in the craft cannabis sector in your riding today. CCAC believe that sensible, evidence-based cannabis legislation is a non-partisan issue that can be a benefit to all segments of society, and we are committed to working with all parties to advance that agenda.

CCAC is also a young, rapidly growing organization, one that represents more than 30 businesses across this province, including cannabis producers, dispensaries, and other businesses who collectively employ hundreds of individuals across the country. Our members are united in their desire for a reasonable, well-regulated cannabis marketplace, one that allows small ‘craft cannabis’ businesses to continue providing employment for their thousands of employees.

According to economic modelling based on conservative figures of BC’s cannabis economy, the craft cannabis sector employs an estimated 14,000 to 40,000 individuals, who collectively earn \$600m to \$1.5b in wages. The entire cannabis economy represents over \$8 billion dollars a year of activity in BC alone, most of it centered in the existing grey-market cannabis sector. Any attempt to regulate the cannabis market by destroying these existing small businesses would have a huge impact on BC’s economy, regardless of the intent.¹

CCAC believe that these key, indisputable facts have been lost in the rhetoric surrounding legalization and regulation of our industry, and the narrative of organized crime. CCAC aims to change that dynamic, and we would like to start that process by working with you and your party to present a new, sensible, and evidence-based framework for cannabis policy. We know these people are not organized crime, they are green entrepreneurs- and it is these craft producers that drive organized crime out of the business through efficient competition and sensible regulation.

The small-scale cannabis producers and retailers of Canada recognize that the time has come to begin a new, regulated chapter of their existence, one where they pay taxes and obey laws like every other business. They are more than willing to adopt the highest standards for cannabis handling and sale. In fact, CCAC has proactively adopted world-leading standards for analytical testing of cannabis products, standards which our members have voluntarily adopted while we wait for the federal government to bring in reasonable regulations that will withstand court challenge.

However, we have become increasingly concerned that our willingness to adopt these regulated standards is being ignored, and that a concerted campaign is underway to ensure that cannabis production and distribution is tightly controlled in the name of ‘safety’- control that will rest in the hands of a select few monopolies, for the benefit of a handful of well-connected unions and private equity companies. These

¹ See attached economic report, “The Cannabis Market in Canada and British Columbia”.

monopolies will generate fewer jobs and opportunities, particularly for young entrepreneurs, and will destroy existing jobs in the sector rather than bringing them into the regulated economy.

CCAC is concerned that unless provincial politicians become involved in these negotiations, and stand up to loudly defend the existing craft cannabis economy in their local communities, that entire cannabis economy will be handed off to these corporations and unions at the stroke of a pen, shutting local craft producers out of the marketplace overnight. Rather than co-opting and legitimizing this economic activity, the current plan is to simply destroy it outright and replace it with a corporate-friendly system.

The cannabis agricultural economy has sustained many rural communities throughout this province, communities that have been devastated by the loss of primary industries. The fact that this economy was mostly illicit is an unfortunate consequence of prohibition, but does not change the simple economic fact that cannabis cultivation has sustained these communities for decades.

The model CCAC proposes as an alternative is hardly radical- it has already been adopted in jurisdictions like Alaska and California to great success. Our model treats cannabis more like craft beer, allowing responsible small-scale production and encouraging craft producers to flourish. We believe this can not only protect and sustain the existing jobs, but it can create thousands of new jobs in cannabis tourism, craft production, and biotechnology research. This pragmatic, sensible approach has been tried in America, a country far more divided on cannabis prohibition, to great success- this is no longer an area where politicians need to blaze trails.

CCAC believe there needs to be more local political leadership on this file, and that individual MLAs can play a key role in making that happen in our current minority government. We would like to work with your policy advisors on developing a comprehensive policy framework for the cannabis economy, one that your party can use to develop legislation in line with your election promises and party platform.

I would like to meet you at your earliest convenience to discuss our concerns, and to present you with a proposed regulatory framework we have developed based on best practices from Colorado, Oregon, and California. We can also introduce you to some of the craft cannabis entrepreneurs in your riding, to show you who we represent and how they connect to your home community.

To that end, I have also attached some documents, including an economic analysis of jobs currently deriving from the existing grey-market cannabis economy. We have also prepared a FAQ to address many of the key points we believe are key for the provincial government to understand and act on quickly.

Thank you for your time and for considering my request. I look forward to hearing back from you.

Sincerely,



Ian Dawkins

President

6047007576

Cannabis Commerce Association of Canada



The Cannabis Market in Canada and British Columbia

By Larissa Flister

Page 05 to/à Page 21

Withheld pursuant to/removed as

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APPENDIX A – Forecast Calculation

User projections were calculated as follows:

- The percentage of individuals who, in 2012, reported having used marijuana at least once in the past 12 months – based on Statistics Canada (2015b);
- Yearly growth in the percentage of individuals who reported having consumed marijuana in the past 12 months in 2002 versus 2012. Yearly growth rate was calculated per age group (see Table 1) – based on Statistics Canada (2015b);
- Growth rate per age group is applied to the current Canadian population for each age bracket and forecasted for the next 20 years based on annual population growth of 1.1% - based on Statistics Canada (2015a, 2015b, 2014);
 - Forecasts are divided in five age brackets, based on anticipated growth or decrease in the number of individuals who consumer marijuana at least once a year in each bracket:
 - 15 to 17 years old – annual decrease of 3.48% in the percentage of users (20% in 2012);
 - 18 to 24 years old – annual decrease of 0.78% in the percentage of users (33.3% in 2012);
 - 25 to 44 years old – annual increase of 1.09% in the percentage of users (15.6% in 2012);
 - 45 to 64 years old – annual increase of 4.53% in the percentage of users (6.7% in 2012);
 - 65+ years old – annual increase of 14.87% in the percentage of users (0.8% in 2012).

Market size projections are calculated as follows:

- Based on CIBC's World Markets estimate that the current Canadian market for marijuana is worth approximately CAD\$5 billion;



- Future forecasts are based on current estimated market size and adjusted for estimated number of users and annual inflation of 2% - inflation is based on the Bank of Canada annual inflation midpoint of 2% (2016).



APPENDIX B – Employment in BC

Employment in the cannabis industry is thus estimated by using Colorado, a state with a similar population size (5,456,574 versus BC's 4,683,139), as a proxy (BC Stats, 2016; The United States Census Bureau, 2016). As of 2015, approximately 16,000 individuals had been licensed to work in the cannabis industry. Adjusting for population, it is estimated that approximately 13,732 individuals work in the BC industry.

Employment figures are imprecise due to the illegal nature of the market. However, an estimate may also be made based on the size of BC's market for domestic consumption. An anonymous grower presented the following account:

For every 50 1000w flowering lights I have one full time employee. If we say an average of 10 weeks, because I have always run longer flowering sativas, etc., then the total man-hours for 50 lights in flower is 400hrs.

Vegetative stages are less costly. One employee at 25 hrs per week can take care of enough plants for 100 eventual flower lights. At 4 weeks veg, that adds another 100hrs, cut in half for 50 lights. That means that without setup, processing, management, or sales considered, 450 hours for 50 lights to harvest.

Under ideal conditions, 1g per watt of light is the goal inside. This would mean a kilo per light. Let's lower that to 75%, because the ideal restricts variety, and because this is agricultural at its core so things happen. That means 75 kilos, or 165 lb. 450 divided by 75 brings it to six hours per kilo.

The next consideration is processing and packing. The goal is to stay under \$100/lb in processing costs. So add \$220 to each kilo just for that, which is the equivalent of adding around 9 hours at \$25 per hour, which is pretty standard.

So, the total per kilo for growers and processors is about 15 man-hours per kilogram of cured product.

This does not consider the use of trim to make secondary products like oils or edibles.

(...) This is all estimated based on my personal experience, and doesn't take into account cloning, room turnover, trade work, sales, management, finances, legal, or cleanup. It also ignores any non-labour related costs.

The employees involved in growing and processing cannabis, according to the grower's account, are paid around \$25 an hour. If each employee works 1,125 hours per year, this implies that given an annual production of 308,000kg in BC (intended for domestic production alone), there are around 4,106 part-time individuals employed in the



growing and processing segment, totaling \$115.5 million in wages for that segment alone. In addition to growing and processing, there are individuals involved in making secondary products like oils or edibles, account cloning, room turnover, trade work, sales, management, finances, legal, and cleanup. Given the average wage for employees in the cannabis trade is likely not as high as that for those involved in other parts of sale (legal, sales, finances), total wages are calculated based on \$25/hour at full-time rates. This indicates that for the 13,732 individuals involved in the cannabis industry, wages are likely to be in excess of \$618.1 million.

Hembree, Sara PSSG:EX

From: Farnworth.MLA, Mike <Mike.Farnworth.MLA@leg.bc.ca>
Sent: Monday, August 28, 2017 2:27 PM
To: Minister, PSSG PSSG:EX
Subject: FW: CCAC - Request for meeting
Attachments: Letter to BC MLAs CCAC.pdf; Report on Cannabis Labour Impact in BC.pdf

From: Jaclynn Pehota [<mailto:jaclynn@cannacommerce.ca>]
Sent: August 16, 2017 4:10 PM
To: Farnworth.MLA, Mike <Mike.Farnworth.MLA@leg.bc.ca>
Subject: CCAC - Request for meeting

Dear Mr. Farnsworth,

I'm writing to you today to request a meeting on the subject of cannabis legalization.

The Cannabis Commerce Association of Canada (CCAC) is a non-profit trade association that represents small craft cannabis businesses across Canada. The majority of our membership live in British Columbia and they represent a significant economic block which we are working to integrate into the coming legalized market.

Please find attached a letter from our President, Ian Dawkins as well as an economic report commissioned on the impact of cannabis on the economy of BC.

Please let me know if it is possible to schedule some time to speak to you on this subject, and its potential impact on voters in your riding. I have included my contact number below.



Thank you for your time.

Regards,

Jaclynn Pehota
Director
Cannabis Commerce Association of Canada (CCAC)
[7787724343](tel:7787724343)



Hembree, Sara PSSG:EX

From: Pollock, Glenn <Glenn.Pollock@leg.bc.ca>
Sent: Friday, September 1, 2017 12:52 PM
To: Hembree, Sara PSSG:EX
Cc: Wakeman, Michelle PSSG:EX
Subject: FW: Meeting request with Minister Farnsworth

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Ladies:

I'm sending this whole thread over for you to hopefully follow up on a meeting request.

The request was sent to my City Council email as one of the people involved in this group is a Council colleague of mine from Maple Ridge, Craig Speirs.

Thanks and have a great long weekend.

Glenn Pollock

Constituency Assistant to Mike Farnsworth MLA
Minister of Public Safety, Solicitor General and Government House Leader
Constituency Office 107A-2748 Lougheed Hwy.
Port Coquitlam, BC V3B 6P2
T-604-927-2088 F-604-927-2090

From: Councillor Glenn Pollock [mailto:pollockg@portcoquitlam.ca]
Sent: September 1, 2017 12:49 PM
To: Pollock, Glenn
Subject: FW: Meeting request with Minister Farnsworth

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Ministry of Public Safety and Solicitor General	
RECEIVED	
SEP 06 2017	
<input type="checkbox"/> MO Response	<input type="checkbox"/> INFO FILE
<input type="checkbox"/> DMO Response	
CC:	
OTHER:	

Glenn Pollock
City Councillor
City of Port Coquitlam

From: Councillor Glenn Pollock
Sent: September 1, 2017 12:48 PM
To: Ian Dawkins
Cc: Craig Speirs
Subject: RE: Meeting request with Minister Farnsworth

Hey Ian:

Not sure of his schedule on those days but, the Leg is in session at that point so he will be in Victoria.

I'll forward this whole thread over to his Office Manager in Victoria and she can follow u[.

A point of clarification; his name is spelled Farnsworth...no "s".

Regards

Glenn Pollock
City Councillor
City of Port Coquitlam

From: Ian Dawkins [ian@cannacommerce.ca]
Sent: September 1, 2017 12:44 PM
To: Councillor Glenn Pollock
Cc: Craig Speirs
Subject: Re: Meeting request with Minister Farnsworth

Hi Glenn,

I will be in Victoria for meetings with a number of MLAs on the same topic September 20-22. I am available most of those days at whatever time would be convenient to Minister Farnsworth (pretty much any time after noon on the 20th and 22nd, and any time on the 21st.)

Would any of those days work?

Thanks!

-Ian



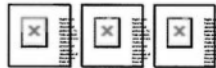
Ian Dawkins

President

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T: [6047007576](tel:6047007576)

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On Fri, Sep 1, 2017 at 12:27 PM, Councillor Glenn Pollock <pollockg@portcoquitlam.ca> wrote:

Hey Ian:

I'm happy to do what I can to facilitate a meeting for you and Craig with Minister Farnworth. The one question that I so have is would you be able to meet with Mike in Victoria? The Legislature resumes sitting on Fr. Sept 18 and following that date Mike will be spending most of his time in Victoria.

Please let me know if that would be a possibility and if it is I'll forward your request to the Ministry for follow up.

Thanks

Glenn Pollock
City Councillor
City of Port Coquitlam

From: Ian Dawkins [ian@cannacommerce.ca]
Sent: September 1, 2017 12:19 PM
To: Councillor Glenn Pollock
Cc: Craig Speirs
Subject: Meeting request with Minister Farnsworth

Good afternoon Glenn,

I am writing to request a meeting with Minister Farnsworth for both myself and Maple Ridge Councilor Craig Spiers, on the subject of BC's forthcoming cannabis legislation and regulation. As the Acting President of the Cannabis Commerce Association of Canada (CCAC) I represent a number of craft cannabis businesses that operate municipally-licensed dispensaries and cannabis farms in the "craft cannabis" sector, and would like to discuss our specific concerns about cannabis legalization and its economic consequences with the Minister. As you know, Craig has also taken up this subject at a municipal level, and suggested that you might make a good point of contact to facilitate our meeting request.

I have attached a copy of our recent submission to the federal Health Committee as a backgrounder document that should give your office a good sense of who we are and what policies we advocate. Our request is strictly as a stakeholder group, and I will not be advocating for the individual economic interests of any cannabis businesses in this meeting.

Please let me know if you have any specific questions about my request. I have also copied Craig on this message.

Thank you for your time,

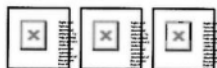
-Ian Dawkins



Ian Dawkins
President
Cannabis Commerce Association of Canada

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October 23, 2017

Ref: 523057

Ian Dawkins, President
Jaclynn Pehota, Director
Cannabis Commerce Association of Canada (CCAC)
jaclynn@cannacommerce.ca

Dear Mr. Dawkins & Ms. Pehota:

Your email and letter, dated August 28, 2017, to Minister Mike Farnworth regarding the legalization and regulation of non-medical cannabis, has been forwarded to the Cannabis Legalization and Regulation Secretariat (the Secretariat) of the Ministry of Public Safety and Solicitor General for reply.

The Secretariat is conducting policy work to support the development of a provincial regulatory framework for the legalization and regulation of non-medical cannabis and the goals of prioritizing the health and safety of British Columbians, reducing crime and the illegal market, protecting children and youth, and addressing cannabis impaired driving are guiding this work. In addition, the Province is committed to developing a made-in-B.C. regulatory framework that supports economic development throughout our province.

As you know, the Province launched a public and stakeholder engagement process and I can confirm that we have received the submission of the CCAC.

Your input is valuable and we appreciate you taking the time to participate. Should you wish to meet with representatives from the Secretariat please contact us by mail or email (Cannabis.Secretariat@gov.bc.ca) and we will follow up in due course.

Thank you for writing.

Cannabis Legalization and Regulation Secretariat
Ministry of Public Safety and Solicitor General
PO Box 9285, Stn Prov Govt
Victoria, B.C. V8W 9J7
CLIFF# 523057

From: Rosy Mondin
To: [Minister, PSSG PSSG:EX](#)
Subject: CTAC Meeting Request
Date: Monday, October 23, 2017 4:09:29 PM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[2017-10-23 CTAC Meeting Request \(Farnworth\).pdf](#)

Hello:

Please find attached our request for a meeting with Minister Farnworth.

Thank you in advance,

Rosy Mondin

Rosy Mondin

rosy@sustainablecannabis.ca

[\(604\) 346-8118](tel:(604)346-8118)

www.sustainablecannabis.ca



From: [Chapotelle, Jacqueline TRAN:EX](#)
To: [Hembree, Sara PSSG:EX](#)
Subject: FW: Privateer Holdings Meeting Request
Date: Wednesday, October 25, 2017 3:08:59 PM
Attachments: [image001.png](#)

Referring to your office for consideration.

From: Jackson, Lindsey B TRAN:EX
Sent: Wednesday, October 25, 2017 2:42 PM
To: Chapotelle, Jacqueline TRAN:EX
Subject: FW: Privateer Holdings Meeting Request
Will you send this along to PSSG for me please.

From: Harder, Derrick TRAN:EX
Sent: Wednesday, October 25, 2017 2:22 PM
To: Trevena.MLA, Claire F LASS:EX
Cc: Transportation, Minister TRAN:EX; Chapotelle, Jacqueline TRAN:EX; Stone, Lynne TRAN:EX; Jackson, Lindsey B TRAN:EX
Subject: Re: Privateer Holdings Meeting Request
Can we refer to PSSG please
Thanks

Sent from my iPhone

On Oct 25, 2017, at 2:00 PM, Trevena.MLA, Claire <Claire.Trevena.MLA@leg.bc.ca> wrote:

From: Sarina Rehal [<mailto:sarina.rehal@crestviewstrategy.ca>]

Sent: October 24, 2017 1:06 PM

To: Trevena.MLA, Claire <Claire.Trevena.MLA@leg.bc.ca>

Subject: Privateer Holdings Meeting Request

Dear Hon. Claire Trevena,

I am reaching out today to request a meeting on behalf of Privateer Holdings.

Privateer will be in **Victoria and Vancouver Monday November 6th and Tuesday November 7th** meeting with MLAs, Ministers and other officials.

Privateer Holdings is a private equity firm shaping the future of the legal cannabis industry globally. Founded in Seattle in 2010, they have raised more than \$120 million (USD) from a group of investors from Canada and around the world. Privateer currently operates in Canada through Nanaimo-based subsidiary [Tilray](#), which is one of the largest licensed producers of medical cannabis in Canada, providing qualified Canadian patients a superior offering of medical cannabis products that include dried flower as well as extracted oil formulations.

I will follow up by phone to determine what time would work best. In the meantime, your staff can reach me at 416-333-6489 or sarina.rehal@crestviewstrategy.ca

--

Sarina Rehal | Consultant | [Crestview Strategy](#)
e: sarina.rehal@crestviewstrategy.ca
t: 416.333.6489

From: JAG Policing and Security Branch JAG:EX
To: "mdavis@publicaffair.ca"
Subject: response to your email dated March 7, 2017
Date: Tuesday, March 21, 2017 11:02:00 AM

Mr. Michael Davis

Email: mdavis@publicaffair.ca

Dear Mr. Davis:

Your email dated March 7, 2017 addressed to Premier Christy Clark, as well as the Honourable Mike Morris, Minister of Public Safety and Solicitor General, the Honourable Suzanne Anton, Attorney General and Minister of Justice, and the Honourable Terry Lake, Minister of Health, has been forwarded to the Policing and Security Branch of the Ministry of Public Safety and Solicitor General for reply. In your email, you indicate that the Canadian Association of Medical Cannabis Dispensaries (CAMCD) will announce on March 8, 2017 its intention to establish testing standards and protocols for cannabis sold through its affiliated dispensaries.

While we appreciate you sharing this information, it is imperative to note that storefronts selling cannabis, commonly known as dispensaries and compassion clubs, are not authorized to sell cannabis for medical or any other purposes. Until such time as the law is changed, the distribution and sale of cannabis through these illegal storefronts are subject to law enforcement action in Canada.

Currently, the only legal access to cannabis in Canada is for individuals who require cannabis for medical purposes. According to the *Access to Cannabis for Medical Purposes Regulations* (ACMPR), those who require access to cannabis for medical purposes can purchase it directly from one of the Health Canada licensed producers, register with Health Canada to produce a limited amount for their own medical purposes, or designate someone else to produce it on their behalf. Health Canada is responsible for the regulation of cannabis for medical purposes under the ACMPR, including the requirement for analytical testing of medical cannabis distributed by Health Canada licenced producers.

Thank you for writing.

Policing and Security Branch

Ministry of Public Safety & Solicitor General

PO Box 9285, Stn Prov Govt

Victoria BC V8W 9J7

CLIFF# 520341

From: [King, Kim J M JAG:EX](#)
To: [King, Kim J M JAG:EX](#)
Subject: FW: Cannabis Dispensaries to Set Up Their Own Testing System
Date: Thursday, March 9, 2017 2:35:12 PM
Attachments: [image001.png](#)

From: Dhillon, Harbir PSSG:EX
Sent: Thursday, March 9, 2017 2:33 PM
To: King, Kim J M JAG:EX
Cc: Thompson, Angella N PSSG:EX
Subject: Re: Cannabis Dispensaries to Set Up Their Own Testing System
Send it to PSB for a reply direct.

Sent from my iPhone

From: King, Kim J M JAG:EX
Sent: Thursday, March 9, 2017 8:51 AM
To: Dhillon, Harbir PSSG:EX
Subject: FW: Cannabis Dispensaries to Set Up Their Own Testing System
Good morning Harbir,
Redirected by JAG. Action, please.
Thanks for advising,
Kim

From: Michael Davis [<mailto:mdavis@publicaffair.ca>]
Sent: Tuesday, March 7, 2017 10:42 AM
To: OfficeofthePremier, Office PREM:EX; Minister, HLTH HLTH:EX; Minister, JAG JAG:EX; Morris.MLA, Mike LASS:EX
Subject: Cannabis Dispensaries to Set Up Their Own Testing System
On March 8, 2017, the Canadian Association of Medical Cannabis Dispensaries (CAMCD) will announce it is setting up testing standards and protocols to ensure the safety of the cannabis that its member dispensaries are selling.
CAMCD believes consumers should be empowered to make educated choices about the cannabis products they buy, so we are moving to set up a rigorous, independent and transparent cannabis testing system.
The Canadian Association of Medical Cannabis Dispensaries promotes a regulated community-based approach to cannabis access with member dispensaries who serve over 150,000 consumers.
Store front cannabis dispensaries are not allowed to test their product through federally licensed laboratories. CAMCD is setting up its own testing after federally licensed medical marijuana producers recalled cannabis contaminated with the chemicals bifenazate and myclobutanil in November and December 2016.
The CAMCD board has created a working group with dispensary owners, cannabis producers, processors, and lab owners, to create guidelines and structure for the testing program. The board wants the system to be in place by May 2017.
For further information, please contact:
Michael Davis
on behalf of CAMCD
c. 604.704.7526
o. 604.553.0609