

**Office of the Chair**

770 Harmston Avenue, Courtenay, BC V9N 0G8  
Tel: 250-334-6000 Fax: 250-334-4358  
Toll free: 1-800-331-6007  
www.comoxvalleyrd.ca



File: 0400-20

May 25, 2020

**Sent via email only: ldennis@comoxvalleyrd.ca**

Board of Directors  
Comox Valley Regional District

Dear Directors:

**Re: Changes to cannabis retail regulations**

Earlier this month the Comox Valley Regional District received the attached correspondence from a small cannabis retail outlet seeking the Board's support in advocating to the Government of British Columbia to enact further regulatory changes respecting their services in response to the COVID-19 pandemic.

The requested changes follow the regulations established in both Saskatchewan and Ontario that allow private cannabis retailers to take online payment and make door-to-door delivery of cannabis products under appropriate measures and guidelines. Implementing such changes would support reduced in-store traffic and limit potential exposure for patrons of cannabis stores, which are recognized within our province as an essential retail service.

In light of the ongoing pandemic these appear to be appropriate measures to better support access to regulated cannabis and safely patronize local businesses. As such, I respectfully request the Board's consideration of the following resolution:

"THAT the Board write to the Province of British Columbia to request regulatory changes to enable regulated cannabis retailers to provide online payment and direct delivery service options."

Sincerely,

***J. Ketler***

Jesse Ketler  
Chair

Enclosure/

cc: Claire Trevena, MLA, North Island  
Ronna-Rae Leonard, MLA, Courtenay-Comox  
Scott Fraser, MLA, Mid-Island Pacific Rim

400-01

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**From:** Dennis Schafer <dks@stickandstone.ca>  
**Sent:** May 3, 2020 12:08 PM  
**Subject:** Letter of Support for Public Safety  
**Attachments:** RD Cover letter - ACCRES.pdf; Letter for endorsment.pdf

Dear Regional District Board of Directors,

Stick & Stone Cannabis Co. is a wee Ma & Pa cannabis retail shop located in Fernie BC. Due to current stressors and frustrations, we have collaborated with ACCRES to outline two requests for change to the current regulations that will further the safety measures designed to protect our communities in BC during these trying times and we ask for your support presenting these recommendations to the province.

- 1) Online Sales
- 2) Direct Delivery

As owners of a licensed cannabis retail shop, we have been continuously evolving our operations to ensure the safety of the community as new information about COVID-19 becomes available. We have a wide range of customers many who are predominately middle-aged and elderly who purchase our products for both recreational and medical use.

With our recommended adjustments to the current regulations that were designed for a pre-pandemic world, we would be able to continue to safely provide much-needed products to our at-risk customers who are unable to leave the house, ensure a contactless experience for those who are able to visit the store for curbside pickup and keep our staff safe.

Here is an example of the challenges our current customers are facing because they are not able to pay for our products online during COVID-19:

We received a phone call asking if a curbside pick-up was available by a customer of ours who was elderly. They were in desperate need of a product and the delivery times to order from the BC Cannabis Store were too lengthy. We informed them that we carried the product and would do our best to provide a contactless interaction but they would have to tap our terminal and the wireless system may not register outside.

When the customer arrived their vulnerability was apparent. They were approximately 90 years old with a compromised immune system, so becoming infected would likely result in their death. In order to keep them safe while accepting their payment and providing their product we were forced through the following process:

1. We tried to use the tap feature by pressing the terminal against their car window. This did not work due to card issues.
2. We then bleached the terminal and passed it through a small gap in the window so that the customer could complete the transaction.
3. The product was then left on the hood of their car for them to collect when they felt safe to do so.

Even though the utmost precautions are being taken, it is extremely stressful to force customers to go through these processes that could easily be avoided if we were able to use available technology like online payment systems.

There are processes in place for the legal online purchase and delivery of alcohol in BC as well as cannabis in other provinces which have been effective at keeping their communities safe. We are asking for the same considerations.

I can not stress enough how vital allowing online payments and delivery to be available in BC is to our communities and retailers!! When you have someone's life in your hands, you want to have the safest measures in place.

PLEASE ENDORSE THIS LETTER OF SUPPORT

Thank you for your time,

--

**Dennis Schafer**

Stick & Stone Cannabis Co.

891 7th Ave

Fernie, BC

250.430.7848

[stickandstone.ca](http://stickandstone.ca)

To Minister Farnworth, Solicitor General,

In response to the ongoing COVID-19 public health emergency, the *Association of Canadian Cannabis Retailers* (ACCRES) recognizes the Government of British Columbia for evolving policy to allow for regulated cannabis stores to accept product reservations online and over the phone. This change in regulatory framework will reduce the amount of time consumers have to spend in stores amid the COVID-19 crisis. The status of cannabis retail as an essential service is a recognition of the contributions of these small businesses to the general public. We believe it is appropriate to equip provincial license holders with proactive tools that will allow for them to better protect public health, bolster the legal cannabis market and ensure that these small business remain economically viable for the duration of the crisis.

ACCRES membership would like to see further proactive measures enacted that would further protect both public health and essential workers through these trying times. In supplement to "click and collect"/over the phone ordering, we request that the government enact and support two further regulatory changes to cannabis retail regulations. These measures would be effective in supporting the social and physical distancing measures recommended by public health authorities:

- Online Payment
- Direct Delivery

#### **Online Payment**

In the interest of balancing public health, along with our customers' need to access legal cannabis, and the long-term economic health of our members, we propose that the Government of British Columbia allow retailers to sell their products online or by phone and collect payment in advance.

Allowing for payment in advance avoids the major point of contamination in a "click and collect" transaction: the requirement to accept cash or interact with the payment processing machine. Pre-payment would reduce contact in store to the absolute minimum, and would facilitate the best possible circumstances for social distancing. This measure would serve to better protect both staff and customers during in store transactions.

#### **Direct Delivery**

In further support of social distancing and to accommodate those that are unable to leave their homes due to being immunocompromised or in self isolation, we ask that delivery be allowed directly to customers from the regulated private retailer of their choice. ACCRES believes the best way to ensure continuity of service in these circumstances while minimizing exposure is to allow already trained and security screened staff of private retailers to deliver orders directly to customers. Direct delivery is currently available to the residents of Saskatchewan and Ontario via provincially licensed retailers. ACCRES proposes that these existing regulations be adapted for the BC sector. Contactless age verification is as simple as requiring the upload of photo ID at the time of purchase. The ID can then be matched to the individual receiving the delivery while maintaining a distance of two meters.

Providing greater access to regulated cannabis is vital to protecting public health and safety, and to destabilizing the illicit market - both key aims of the Cannabis Act and provincial regulations. Due to the convenience the illicit market operators continue to be able to offer through direct delivery, legal sales

in BC are tens of millions of dollars behind projected targets in BC. Direct delivery from licensed private cannabis stores conducted in compliance with all health and safety standards provides local communities with an essential and regulated touchpoint that can act as a resource for education and responsible use.

ACCRES believe that by allowing these measures, cannabis retailers will be best equipped to protect public health and safety, while also ensuring the continued operations of independent cannabis retailers that provide access to safe and regulated products. These measures will allow essential services to continue without unnecessarily endangering public health, and we believe these measures will strengthen BC's overall response to the COVID-19 pandemic and the legal cannabis industry in this province.

Sincerely,

Jaclynn Pehota Special Advisor  
Association of Canadian Cannabis Retailers (ACCRES)  
778.772.4343  
[Jaclynn@accres.ca](mailto:Jaclynn@accres.ca)

On Behalf of:

**ACCRES Board of Directors:** Geoff Dear Andrew Gordon Matthew Greenwood Jeremy Jacob Alfred Schaefer Laurie Weitzel

**ACCRES Advisory Board:** Dr. Rielle Capler, MPA, PhDDr. Ivan Casselman PhDRosy Mondin, LL.B, B.A. (Criminology) Adolfo Gonzales Bert Hick Andrew Livingston Sophie Mas Jonathan Page, Adjunct Professor UBC, CSO Aurora Cannabis Heather TaylerDr. Zachary Walsh, PhDTina Zlati

To The Regional District Board of Directors,

Attached is a letter from the Association of Canadian Cannabis Retailers (ACCRES) membership to the Solicitor-General, Hon. Mike Farnworth, calling on the government of British Columbia to further modify cannabis retail regulations in support of physical distancing during the COVID-19 health emergency. ACCRES is seeking your endorsement in support of these measures, which we believe are in line with what other jurisdictions across Canada are adopting.

ACCRES is specifically calling on BC to follow the recent move by Ontario, which in response to COVID-19 has moved to allow private cannabis retailers to take online payment and make door-to-door delivery of cannabis products. Both Saskatchewan and now Ontario have allowed online payment and direct delivery with no significant complications or negative consequences, and we believe these regulatory changes are appropriate for BC as well.

We believe that many municipal governments in BC could stand to benefit from these changes, as they will hopefully reduce in-store traffic and lineups caused by physical distancing requirements for essential retailers like cannabis stores. This should further reduce the chances of spreading COVID-19, something we believe should be the ultimate priority of any regulated system right now.

Finally, we believe this measure is important in allowing licensed, regulated, and tax-compliant retailers a means of competing with unregulated retailers, who are currently quite openly selling cannabis on-line or offering in-person delivery options. With municipal resources currently very constrained and bylaw officers unable to enforce against these proliferating operators, we believe offering these options to regulated retailers could help compliant businesses to compete them out of the market instead.

ACCRES ask that you endorse these initiatives in support of regulated cannabis retailers' efforts to continue serving their customers in a way that protects public health to the greatest extent possible.

Sincerely,

Jaclynn Pehota  
Special Advisor  
*Association of Canadian Cannabis Retailers (ACCRES)*  
7787724343  
[Jaclynn@accres.ca](mailto:Jaclynn@accres.ca)

On Behalf of:  
**ACCRES Board of Directors:**  
Geoff Dear  
Andrew Gordon  
Matthew Greenwood  
Jeremy Jacob  
Alfred Schaefer  
Laurie Weitzel

**ACCRES Advisory Board:**  
Hilary Black  
Dr. Rielle Capler, MPA, PhD  
Dr. Ivan Casselman PhD  
Rosy Mondin, LL.B, B.A. (Criminology)  
Adolfo Gonzales  
Bert Hick  
Andrew Livingston  
Sophie Mas  
Jonathan Page, Adjunct Professor UBC  
Heather Tayler  
Tina Zlati