

May 28, 2018

The Honourable Doug Donaldson
Minister of Forests, Lands, Natural Resource Operations and Rural Development
Parliament Buildings
Victoria, B.C.
V8V 2C2

Re: Cannabis Production on ALR Land

Dear Minister Donaldson,

On behalf of the Union of B.C. Municipalities (UBCM), I write to you today regarding the regulation of non-medical cannabis production on the Agricultural Land Reserve (ALR). I would like to request a meeting at your earliest convenience to discuss our concerns, including the UBCM Executive's support for a moratorium on the production of non-medical cannabis on ALR land until the provincial government undertakes a comprehensive review and broad consultation with local governments.

Last week, I spoke with Minister Selina Robinson regarding the legalization of non-medical cannabis and production on the ALR. During this meeting, I sought advice on how UBCM could best communicate concerns with ALR production to the provincial government. Minister Robinson suggested that I seek a meeting with you to discuss UBCM's position and local issues in greater detail.

Increasingly, ALR land is being used for medical cannabis production, generally in closed, concrete facilities. A greater demand for ALR land, at least in terms of land speculation, is emerging in advance of the legalization of non-medical cannabis. In consideration of this information, UBCM recently made a submission to the Minister's Advisory Committee on the Revitalization of the ALC and ALR, recommending that the committee "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."

UBCM has also discussed local government concerns through the Joint Provincial-Local Government Committee on Cannabis Regulation (JCCR), as well as a provincial working group focused on local governance issues in relation to cannabis production on the ALR. Through these processes, a number of local government concerns have been repeatedly communicated, including:

- Concrete slabs, rising ALR land prices and increasing speculation, and cannabis production are detrimental to provincial food security;
- Policing and enforcement of security requirements identified in the federal licensing scheme may fall to local governments;
- Odour and light pollution are all negative consequences of cannabis production.

Currently, local governments are not permitted to prohibit medical cannabis production on ALR land. Provincial Bylaw Standards dictate the extent to which medical cannabis production can be regulated. UBCM members have opposed these rules, requesting, as part of endorsed resolution 2014-B113, local governments be allowed to regulate the production of medical cannabis within the ALR through land use provisions.

UBCM supports collaboration as the best means to develop policy solutions to address these local concerns. As such, we would request a meeting at your earliest convenience to discuss UBCM's position, and how we may work together to regulate non-medical cannabis production on the ALR.

I look forward to your response.

Kind Regards,



Wendy Booth
UBCM President

cc: *The Honourable Selina Robinson, Minister of Municipal Affairs and Housing*

The Honourable Mike Farnworth, Minister of Public Safety and Solicitor General

Lisa Anderson, Executive Director, Cannabis Legalization and Regulation Secretariat

Martha Anslow, Director of Policy, Corporate Governance, Policy & Legislation Branch, Ministry of Agriculture