



**BC Craft Farmers Co-Op
BC Government Consultation Response
Cannabis Consumption Spaces**

May 2022

Introduction

BC has invited sector stakeholders to provide feedback regarding cannabis consumption policies. In response, the BC Craft Farmers Co-Op (BCCFC) has consulted members through three processes:

1. BC Cannabis Summit in Kelowna, BC between April 20-22, 2022
2. BC craft farmers roundtable in East Kelowna April 23, 2022
3. Virtual BC roundtable May 5, 2022

Cannabis Consumption – BC Questions

BC's stakeholder engagement is focused on non-medical cannabis consumption spaces (tasting rooms, lounges, special events, retail). Feedback is requested on the following questions:

Question	Response
Should BC allow cannabis consumption spaces as described? If yes, how should it be done?	Yes. It is disappointing BC is still asking this question after two years. Is there still doubt? BC should state clearly and quickly they are proceeding in this direction so we can move forward with implementation. With regard to how, participants suggest: • Don't reinvent the wheel. Simply adopt what is working now for wineries, craft breweries and distilleries. • Adoption of the BC Smart Serve program was suggested. • Learn from other jurisdictions, particularly related to special events, farm gate, weddings and restaurant dining for adults. • Collaborate with BCCFC and BC Cannabis Retail Association to help implement these policies and mitigate federal barriers. • Clarify how consumption policies apply to medical use.
Can consumption spaces support economic development, recovery and tourism and shift consumption from illicit to regulated products?	Yes. It is disappointing BC is still asking this question. Had BC listened to previous submissions, there should be no doubt about the potential benefits of implementing these policies. BC needs to act quickly to identify the provincial actions needed to realize how co-ordinated consumption, farm gate and direct sales policies can achieve the sector's full economic potential. BC Cannabis Summit attendees approved several policy solutions for BC and Canada to consider. <i>See link below.</i> Insurance realities need to be considered for locations/tour operators.



How can cannabis consumption policies prohibit indoor smoking/vaping?	Without exception, all indoor smoking activities should be treated the exact same as other products (cigars, tobacco, e-cigarettes). At the same time, a framework that allows for the adult consumption of edible cannabis products, baked goods and cannabis-infused restaurant menu items should be enabled.
How can cannabis consumption policies address drug-affected driving?	All participants support public education related to any kind of intoxicated driving. The roll-out of farm gate and consumption policies, in collaboration with BC cannabis associations, provides a significant public education platform. More broadly, BC Cannabis Summit participants recommended BC and Canada establish a National Cannabis Health Research Institute in our province to answer lingering questions about the benefits and risks associated with cannabis use, including impairment and unique effects created by various delivery mechanisms. <i>See link below.</i>
How can cannabis consumption policies discourage co-use of alcohol and cannabis?	All agree a significant public education opportunity exists with the farm gate and consumption policies to discourage the co-use of alcohol and cannabis. At the same time, some believe too many limitations regarding the legal activities of adults may not be effective or reflect reality. Cannabis infused restaurant menus, weddings, conferences and special event permits where alcohol sales are also on-site were examples of things that should not be unreasonably prohibited. Other participants noted BC has co-located cannabis and alcohol within their own regulatory approach and they approve retail locations in close proximity to liquor establishments. All agree a more adult conversation is needed that focuses on education, best practices in other jurisdictions and recognition that some of these activities are already occurring between adults.
How can cannabis consumption policies require a positive recommendation from the applicable Indigenous or local government?	Participants generally agreed with this, noting these approvals are required for production, retail and processing licence holders now. However, participants suggested clarity is required from the BC government to confirm consumption on ALR lands will be permitted and that cannabis is defined as an agriculture product/activity. <i>See link below.</i> Participants also agreed Canada and BC should provide financial incentives to help Indigenous, local governments and tourism associations facilitate and promote these job creation opportunities. <i>See link below.</i>



General Discussion: Farm Gate

Virtually all participants discussed provincial consumption policies within the context of BC's proposed farm gate cannabis sales policy and the general state of BC's cannabis sector. In this light, we have included a summary of feedback received on BC's farm gate policy roll-out, expected this summer/fall.

- Don't reinvent the wheel. Business integration required to implement cannabis sales at farms or a common-market location already exist in other sectors. We can adopt what is working now for wineries, craft breweries and distilleries.
- Farm gate represents a significant opportunity for small farmers to diversity revenue streams so they are not relying only on wholesale pricing. Land values may also increase.
- Dedicated licencing stream for farm gate stores should not be overly expensive to access, especially since some stores and markets may be seasonal.
- Roll-out of farm gate, direct sales and consumption policies represent a significant public education opportunity that can enlighten consumers and destigmatize the plant.
- BC is moving too slow and missing opportunities. They need to involve the sector more directly in the implementation of farm gate and consumption to ensure they are successful and lessons are applied from other jurisdictions (SK, AB and ONT).
- Farm gate and consumption policies rolled out together represents a significant tourism opportunity for all regions of the province.
- Hemp should be included in the policies given significant consumer interest in CBD products.
- Insurance challenges need to be considered for locations and tour operators.
- Opportunity for existing retailers to collaborate with farmers to help open stores and navigate application process.
- Federal production and processing licensing restrictions are likely to dampen the farm gate experience by keeping consumers/tourists from getting too close to the plant.
- Proactive strategies should be developed that engage the federal regulator and apply best practices from other jurisdictions that can facilitate a meaningful interaction between the consumer and plant.



Conclusion

As noted, more than 450 participants of our recent BC Cannabis Summit in Kelowna had the opportunity to develop policy solutions and opportunities facing our sector and all governments. Many speak directly to consumption consultation and the roll out of related BC policies.

As has been the case with previous consultation, they believe the development and implementation of BC's cannabis policy needs to be better coordinated.

Specifically delegates expressed their support through an inclusive and fully-funded Canada/BC Craft Cannabis Economic Development Partnership that expands the sector's capacity to create jobs, promote 'Buy Local' campaigns, destination cannabis tourism and meaningful public education.

Here is a link to the seven (7) policies prioritized by Summit delegates: [BC Cannabis Summit Delegates Prioritize Policy Solutions for Federal and Provincial Governments: Farm Gate and Consumption Consultation Launched - BC Craft Farmers Co-op \(bccraftfarmerscoop.com\)](#)

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