



**Health Canada Submission  
Cannabis Act Review: Engagement Report and Questionnaire  
November 2022**

**Introduction**

- Canada has launched an 18 month Cannabis Act review one-year later than was required under the Act.
- Health Canada has asked for sector feedback. Some have expressed an openness to interim improvements.
- BC Craft Farmers Co-Op (BCCFC) is responding to that invitation on behalf of the craft cannabis farmers, processors, nursery operators, independent retailers, consumers and supporters we represent.

**Goals**

- Achieve the public interest objectives of Cannabis Act
- Transition BC craft farmers and help them create thousands of rural jobs
- Maintain BC's international brand
- Support regional economic development

**Cannabis Act Review**

Waiting two years for changes to the Act will be catastrophic for BC craft farmers and the industry in general. BCCFC has identified a series of initial questions for the Minister, federal representatives and elected officials to consider:

- What is the Government of Canada going to do over the next 18 months to address urgent challenges facing the sector? How many small, independent cannabis businesses need to close and lay off workers before the Government will take action?
- The federal government is appointing an "expert" panel to review the Act? How will BC and cannabis farmers be represented given our province's rich cannabis history and culture?
- If the Government is pre-occupied with addressing the illicit market, why are you making it so hard for experienced medical and legacy farmers to transition to the legal market?

**Medical Access**

Ensure the current medicinal cannabis program is maintained and strengthened.

Allow BC's network of 6,000 legal medical cannabis farmers to create a safe supply of cannabis for licenced compassion clubs to share with at-risk populations in response to the overdose crisis. Invite these designated medical cannabis farmers to also produce a safe supply of psilocybin (mushrooms) for patients with legal access.

Provide funding to support the establishment of a National Centre of Excellence for Cannabis Health Research in BC.



## **Interim Measures**

### Regulatory

We have five easy-to-make changes the federal government can make in the interim to help small farmers transition and combat the illicit market. These were supported by 400+ delegates at the April 2022 BC Cannabis Summit in Kelowna:

- doubling of the unreasonably low micro-production and micro-processing caps
- pre-clearance of security checks instead of waiting until the end of the process
- allow craft labelling on cannabis products
- adjust edible packaging limits upward
- increase purchase and possession limits from 30 grams (interim legislative change)

### Expungement

Introduce legislation to allow a person who has been convicted of cannabis possession to have their record expunged and that no fee be associated with this process

### Economic Development

In collaboration with BC, Indigenous governments and sector leaders, develop and fund a made-in-BC cannabis economic development and destination tourism strategy to maximize the BC cannabis industry's potential and create thousands of legal jobs.

Collaborate with the newly-formed Canadian Cannabis Tourism Alliance (CCTA) to develop a national cannabis destination tourism strategy with provincial and Indigenous agencies.

All relevant federal government agencies officially recognize across all legislation that cannabis is a legitimate and legal farm activity and product.

Work with Meta, Google, and TikTok and other digital platforms to allow for Canadian legal and licensed producers, retailers and authorized industry professionals to post content and discuss about cannabis in an educational manner on their platforms.

### Conclusion

If significant improvements are not made to the Act and Health Canada continues to approve craft cannabis production licences at the current rate (20/year in BC), jurisdiction should be transferred to an agency mandated to support the industry and help it flourish.

This Agency transfer option should include consideration for Indigenous and provincial governments to take over responsibility for licensing cannabis production and processing within their jurisdictions.

This transition would include the transfer of cannabis tax revenue to provincial and Indigenous government jurisdictions.