



WILD COAST

September 10, 2019

Regional District Chair and Directors
Alberni-Clayoquot Regional District
3008 Fifth Avenue
Port Alberni BC V9Y 2E3

Dear Chair Jack and Directors,

Re: Evidence-based decision making for cannabis production zoning

We are writing to respectfully request that the Board of Directors receive information from industry experts and have a meaningful consultation with residents, before voting on drastically amending existing zoning bylaws that would completely prohibit cannabis production within the ACRD (with the exception of on the ALR).

We believe the Directors have a duty to demonstrate that they have been well informed on this topic beyond the opinions expressed by a community group. This is important because their decision could not only negatively impact pending commercial projects but could also curtail the potential for substantive economic benefit to the community. For this reason, we strongly believe that more consultation is needed prior to implementing extreme zoning amendments.

We attended the Board of Directors Meeting on August 28, 2019 and were confused by the Board's motion to request Staff to draft a bylaw prohibiting any new cement-based cannabis facilities on A1, A2, A3 and industrial zones as this option was never outlined as one of the six options/recommendations in the June 19, 2019 staff report. Instead, we believe this motion was rushed through as a reaction to the compelling but unsubstantiated opinions presented during the petition of a concerned community group.

While we understand that it is imperative to consider and address the concerns of community members, we also believe decisions need to be balanced and also based on evidence from experts and fulsome consultation with all residents.

That is why we are encouraged to learn that the Board is planning to visit a Licensed Producer to learn more about the industry. We ask that the Board hold off on voting on cannabis



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production zoning amendments until after that visit and encourage the Board to seek even more information from industry experts.

We would also respectfully request that the ACRD consider engaging in a meaningful public consultation process about cannabis with residents before making any changes to the zoning. In fact, the City of Port Alberni is currently conducting this type of consultation and could likely provide guidance and advice on how best to execute.

We recognize that this is a nascent industry and it is incumbent on us to go beyond the compliance of all relevant and applicable laws. That is why we are committing to adhere to the corporate social responsibility of the *Responsible Cannabis Framework*, established by the Global Cannabis Partnership, to promote the safe and responsible production, distribution and consumption of legal cannabis. Driving this initiative is a shared commitment to keep cannabis out of the hands of youth, keep profits out of the hands of criminals, and protect public health and safety by allowing adults access to legal cannabis.

The guiding principles of the Responsible Cannabis Framework include:

Responsibility

We believe in the responsible development, production, distribution and consumption of cannabis where it is legally sanctioned. We support the prohibition of all illicit sales to youth; public education and responsible advertising and marketing; research into health and social impacts of cannabis; policies and practices that minimize our environmental footprint; ethical conduct and good corporate governance; and social justice (addressing adverse impacts of prohibition among disadvantaged communities).

Transparency

We are committed setting clear, long-term objectives, developing and monitoring a set of Key Performance Indicators, subscribing to international standards as appropriate, sharing information and best practices with others in the industry, and regularly disclosing accurate and balanced reports of results to the public.

Collaboration

We recognize the value of collaborating with the full range of stakeholders who have an interest in, and are impacted by, the legal cannabis industry, and we will consider their views in the development, implementation and improvement of our daily operations.



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Continuous Improvement

We will seek out and apply best practices appropriate to our business developed by organizations both inside and outside the cannabis sector.

The impact areas of the Responsible Cannabis Framework include environmental, social and governance.

Environmental element:

We recognize our role in minimizing negative environmental impacts and shall identify material environmental risks, impacts and opportunities for our operations, and develop goals, policies, programs and metrics to continually improve results in the following impact areas:

1. Greenhouse Gas Emissions (GHG) management systems that measure and minimize volume and intensity of emissions.
2. Water management, including improvements in consumption, recycling and quality.
3. Packaging materials and/or waste reduction strategies to reduce consumption of raw materials and related environmental impacts.
4. Agricultural practices to reduce human and environmental health impacts, including soil and pest management.

Social element:

We recognize the important role we play in society and commit to continually improve results in the following impact areas:

1. Responsible use education that is shared with the public (within regulatory limits), consumers, customers/suppliers or internally, using evidence-based information on products' properties, effects and risks, and responsible marketing practices.
2. Community engagement/investment, including stakeholder outreach and provision of financial and in-kind support (e.g. volunteering) – within regulatory limits – that aligns the needs of local communities with the corporate mission.
3. Product safety and quality assurance protocols to build consumer and other stakeholder confidence, to ensure quick response to manufacturing and other issues (e.g. recalls), as well as traceability systems to control the supply chain from “seed to sale.”
4. Research supported and/or disseminated to build a body of peer-reviewed scientific research into health-related effects and social impacts of cannabis consumption.



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Governance element:

We recognize the importance of good corporate governance in protecting our legal and social licence to operate, improving financial results and enhancing our reputation. We commit to continually improving results in the following impact areas:

1. Ethics guidelines that define and reinforce acceptable conduct, guard against corruption and conflicts of interests, and promote good corporate citizenship.
2. Compliance to ensure we follow applicable laws and regulations in our jurisdiction in which they operate, including platforms for monitoring, measurement and remediation.
3. Diversity/inclusion to promote equal opportunity and non-discrimination on the basis of recognized standards, such as the UN Declaration on Human Rights.

We thank you for your consideration and look forward to working with the ACRD and other community partners to find a balanced approach to growing the craft cannabis industry in the region.

Kindly,

Angie (Harris) Fernandes
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