

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

In response to the ongoing COVID-19 public health emergency, the *Association of Canadian Cannabis Retailers* (ACCRES) wish to recognize the Government of British Columbia's efforts in evolving policy to allow for regulated cannabis stores to accept product reservations online and over the phone. These changes in regulatory framework will reduce the amount of time consumers have to spend in stores amid the COVID-19 crisis, and will contribute to overall distancing efforts in BC.

The status of cannabis retail as an essential service is a recognition of the contributions of these small businesses to the general public, and the importance of satisfying the demand for legal cannabis. 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 businesses remain economically viable for the duration of the crisis.

ACCRES' member businesses would like to see further proactive measures enacted that would protect both public health and essential workers through these trying times. In addition to "click and collect" and over the phone ordering, we request that the government enact and support two further regulatory changes to cannabis retail regulations in the same vein. 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.

There are numerous software solutions available to cannabis retailers to allow them to track and report online sales in the same way they report in-store sales. These enterprise solutions have been developed for, and deployed in, other Canadian provinces, and would not affect compliance or tracking measures.

We believe that adopting online payment, as other provinces have, would be a significant public health boon that is not out of line with best practices.

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, as they represent the latest evolution of best practices for cannabis retail during the COVID-19 health emergency.

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. Delivery staff are thereby better able to limit exposure through appropriate use of sanitation and PPE, without creating a centralized retail location that exposes all customers who enter.

Providing greater access to regulated cannabis is vital to protecting public health and safety, and to destabilizing the illicit market; both of which are 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, however, legal sales in BC have been suppressed, and we are tens of millions of dollars behind projected cannabis revenue 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 point of access that can act as a resource for education and responsible use.

ACCRES believes 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,
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On Behalf of:

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