**Kim MacNearney
Cannabis Consultant**Beyond 420
Yellowknife, NT X1A 2J1
(867)446-8310
kjmacnearney@hotmail.com

Public Submission Regarding Bill 6: Cannabis Legalization and Regulation Implementation Act

Dear Committee Members,

Thank you for the opportunity to submit on the upcoming legalization of cannabis in the NWT. I have been a medical cannabis advocate for 7 years now and in that time I have provided guidance to more than 200 clients (mostly NWT residents) seeking medical authorizations. I believe I have a good understanding of some of the key concerns that I and many of my clients (who are also NWT patients) have regarding the regulations as they have been put forward. I will address these below.

1 – The Vendor system should not be a closed system, with the decision power resting in the hands of one Minister. It should be an open application system, with appropriate and transparent regulations that businesses would be more than happy to abide by. The opportunity for Cannabis business development in the NWT is huge and it should be embraced by the GNWT, allowing it to grow in an entrepreneurial fashion. The actual product distribution from Licensed Producers is managed at the Federal level, so this should leave room to allow local stores to sell cannabis through a specific business license process. The federal plan for a seed-to-sale system of tracking the product will ensure there is no chance for black market diversion at the store level. The use of the current liquor store system is not what I would like to see. I believe this is not the proper step forward for the NWT, especially because it does not properly address the needs of residents in the other communities.

2- Bootlegging in the NWT communities will not disappear if residents are told they need to order their cannabis online and have it arrive later by mail. There are numerous issues with this proposal; lack of trained resources onsite to guide residents through use of cannabis, lack of computer access, questionable security of product delivery to the home, and basic lack of access issues. If residents in Yellowknife will be able to walk into a store, talk to educated staff and buy cannabis; then the inability for NWT community residents to have the same type of access could almost become a constitutional issue. I believe there are many alternatives to mail order, for one example; a mobile shop with a circuit schedule for monthly or bi-weekly community visits that would include both sales and education.

3 – Education and training regarding the use of cannabis will be a key component to making this a successful transition to a legal cannabis market while ensuring safety of NWT residents. Staff at the stores must be trained but not just on the potential “dangers” or side effects. They must also be educated on proper use and techniques, equipment and ingestion methods, type and strain information. Much like a wine shop could educate you on the different wines they offer, how strong they are or how they taste. I believe if alcohol had been brought out of prohibition with this same kind of education, we would not see the levels of alcohol abuse that we currently have in our society. The federal legislation indicates that stores should have trained staff, not just cashiers at the till. I would like to see the GNWT create a group or strategy for this type of training and education and a plan to roll it out.

4 – Consumption RE: second hand smoke. I believe the same regulations should apply to cannabis that currently apply to smoking tobacco, both in public and in the home. Placing extra restrictions around cannabis smoking would require the use of even more enforcement resources, which is not necessary.

5 – Cannabis Lounges (vapor and/or smoke). The biggest gap I can see in Bill 6 is the absence of business establishments where people can consume cannabis. Many people may want to try it for the first time now that it will be legal or maybe they regularly consume cannabis, but would prefer to do it outside of their home. By not allowing lounges, the GNWT is perpetuating the stigma of “cannabis use and users are bad and should not be within public view”. This lingering reefer madness ideal needs to be put to rest. Adults of legal age should be allowed to gather and consume cannabis in a safe and proper environment, using the same type of regulatory system as alcohol in bars. The business opportunities for this type of establishment are almost unlimited, and should not be overlooked. I believe it would be a poor choice to legalize the sale of cannabis but not allow consumption within regulated environments.

6 – Medical Cannabis Access. I recognize the ACMPR (Access to Cannabis for Medical Purposes Regulations) is a federal level program and has no direct relation to Bill 6, but it is a companion issue to legalization that needs to be discussed.

The physicians in the NWT are very reluctant to authorize patients requesting medical cannabis. This is a message repeated to me regularly by dozens of clients who seek out my assistance. In a recent court decision out of BC Supreme Court, the presiding judge stated that due to lack of empirical evidence of cannabis as a medicine that the court was to accept the patient’s testimony as anecdotal evidence in the case. This should mean, when a patient confides to their doctor that a particular substance (cannabis) has a beneficial impact on their health, the doctor could support that request and authorize the use of cannabis. The Health Canada system for medical authorizations is not as complicated or daunting as it used to be or as the doctors still think it is. I have compiled dozens of authorization request packages for patients to take to their NWT doctors and all were refused, except 2. The NWT medical community’s lack of awareness or education about cannabis as a medicine should not be a barrier to medical cannabis access for patients. There are at least 2 physicians in Canada who offer Medical Cannabis training to other physicians and can address their questions and concerns from a medical perspective. I would like to see the GNWT support physician training regarding the medical use of cannabis.

I would be happy to answer any questions that my submission might have raised. I look forward to seeing the progress of Cannabis Legalization in the NWT.

Thank you for your time and consideration.

Sincerely,
Kim MacNearney