



November 17th, 2022

Cannabis Act Legislative Review Secretariat
(sent via email: legreview-examenleg@hc-sc.gc.ca)
Health Canada
Address locator 03021
Ottawa, Ontario
K1A 0K9

To whom it may concern:

Re: Federal Cannabis Act Review

The purpose of this correspondence is to provide a formal response to the Federal Government's review of the *Cannabis Act*.

At its October 20th, 2022 Regular Meeting, Council for the Township of Malahide directed Township Administration to prepare and forward specific municipal impacts and costs in relation to current cannabis legislation to the federal government's cannabis legislation review process.

The Township of Malahide has incurred significant legal fees, council and staff time, and general community disruption, all pertaining to licenses issued under the federal Medical Cannabis Registration process. Township Council and staff time has cost taxpayers here approximately \$14,000 in the last 18 months alone, with additional incurred costs within the same time period of approximately \$8,000 for outside legal and other consulting advice.

The Township of Malahide is not against or opposed to cannabis, and appreciates the roles that both the federal and provincial governments provide in assisting municipalities. However, the Township believes that there are many improvements that can be made, especially in the areas of inspections, enforcement, and ensuring that operations and licenses issued for same are appropriate and take into consideration and minimize impacts on surrounding land uses.

As it currently stands, municipalities, especially smaller, rural municipalities such as Malahide, have little resources to effectively combat a situation where Health Canada has issued licenses for a scale of growing that would never seem appropriate on a residential property.

With the above concerns, the Township of Malahide fully supports the key messages of The Association of Municipalities of Ontario (AMO), which include: local governments,

residents, and communities continue to be concerned about multiple medical cannabis grow authorizations that can sometimes be located in one place; a concern that there is a lack of information on authorized operations in communities; and, local governments should be able to recoup the costs associated with enforcement related to medical cannabis grows, with a portion of any fines and licensing fees collected being transferred to municipalities to cover the local cost of enforcement.

Thank you for the opportunity to provide comment.

Respectfully,

A handwritten signature in black ink, appearing to read 'Adam Betteridge', with a stylized flourish at the end.

Adam Betteridge, MCP, RPP
Chief Administrative Officer, Township of Malahide
abetteridge@malahide.ca

cc:

- Township of Malahide Council
- The Association of Municipalities of Ontario (AMO) c/o Craig Reid (creid@amo.on.ca) and Daniela Spagnuolo (dspagnuolo@amo.on.ca)