



May 4, 2018

SENT ELECTRONICALLY

Standing Committees on Social Development and Government Operations
Government of the Northwest Territories
PO Box 1320
Yellowknife, NT

Attn: Mr. Shane Thompson
Mr. Kieron Testart

Re: Bill 6: Cannabis Legalization and Regulation Implementation Act

Dear Mr. Thompson and Mr. Testart;

On behalf of the NWT Association of Communities, I want to thank you for providing us with the opportunity to comment on the draft Bill 6: Cannabis Legalization and Regulation Implementation Act.

Further, we would like to congratulate the Committees on the extensive consultation that you are doing.

The sense of frustration being experienced by our member communities about the lack of consultation with them as part of the legislation design was expressed repeatedly at our AGM in February. Communities feel that they are not being acknowledged as a level of government being impacted by the legalization. Further, the NWTAC and the City of Yellowknife had requested to be included in the working group drafting the legislation, to no avail. Many other Municipal Associations across the country have been actively engaged by their Provincial/Territorial Governments.

While we appreciate the time sensitivities of this project and would not want to cause delays to the implementation of the legislation, we would continue to extend our request to be at the table working on the drafting of regulations and implementation of the legislation.

Attached you will find the NWTAC resolution on Cannabis Legalization that was passed at our May 2017 Annual General Meeting and reaffirmed in 2018. I would like to highlight a number of concerns that are in the Resolution and a number that have been raised since:

- Communities will be significantly impacted by Legalization. They may have to look at zoning bylaws and smoking bylaws in addition to their Employment Policies. They need resources to do this.
- While the GNWT contends that they will do enforcement using Environmental Health Officers, how practical is this with 33 communities many of which are remote? We should be exploring an integrated approach.
- More planning needs to be done around the issue of plebiscites. Will communities have adequate time to request a plebiscite and circulate education materials (which we would suggest should be developed by the Territorial Government) so community members can effectively participate in the plebiscite? Rather than waiting for communities to make a request, should the government be more pro-active and ask communities if they want a plebiscite? Will timing allow for all of this to take place prior to Legalization?
- We have requested a municipal share of the revenue and have received an unrevocable no. While we respect that the revenues will be low for our Territory and that communities are not responsible for policing in our jurisdiction, communities are currently underfunded to the tune of 37%. They should not be expected to absorb these additional costs.

The Federal government increased the Provincial/Territorial share from 50 to 75% so that it could be passed on communities. Some jurisdictions in Canada have already announced that they will be passing on 40% of

revenues to communities as well as providing training to all appropriate staff.

- We are given to understand that some consideration will be given to communities retain any revenues collected around fines that community's by-law officers write, whether through the Territorial Act or Community By-laws, but we would like to have this confirmed.
- Generally, communities have so many unanswered questions, that need to be addressed both around the legislation and regulations but also around Public Health. More work needs to be done around this outreach.

In closing, I want to once again reiterate that we appreciate the opportunity to comment on the draft legislation and offer any assistance we can with respect to the development of the regulations and implementation of the legislation. We are more than prepared to push out messaging and education materials to our members as well as advise on the regulations and implementation.

Yours sincerely;

A handwritten signature in black ink, appearing to be 'Sara Brown', with a long horizontal line extending to the right.

Sara Brown, P. Eng.
Chief Executive Officer
NWT Association of Communities

CC: City of Yellowknife