

January 21, 2022

**RE: Budtenders' Safety and the Proposed Repeal of Store Front Cannabis Retailer Regulation, Bylaw No. 19-053**

Dear Mayor Helps,

Since 2020, UFCW 1518 has proudly come to represent Budtenders, Cannabis Producers, and Cannabis Delivery Drivers throughout British Columbia. In the City of Victoria, we represent unionized Budtenders at eight (8) cannabis dispensary locations: Clarity Cannabis (Gorge Road and Johnson Street), Trees Cannabis (Fort Street and Cook Street), The Original Farm (Douglas Street), Burnside Buds, and Seed and Stone (Gordon Street and Fort Street).

Our members in the cannabis industry are concerned by the Staff Report of December 16, 2021, that was tabled to the Committee of the Whole on January 13, 2022. This Staff Report recommends the repeal of the Store Front Cannabis Retailer Regulation, Bylaw No. 19-053 (The "Bylaw"). While some of the report's recommendations may be appropriate as the City of Victoria looks to modernize cannabis industry regulations, there are other aspects that are concerning to our members who work on the frontline.


Of particular concern is the proposed change to staffing levels outlined in table 1 of the report. The current Bylaw requires two (2) staff to be onsite for all hours of public operation, including at least one (1) manager. Repeal of the Bylaw would permit Cannabis Retailers to reduce staffing levels to one (1) employee onsite. Currently there are no Provincial regulations that would maintain the minimum staffing levels in force under the existing bylaw. The safety of our members will be put at risk if this bylaw is repealed. Repeal of the Bylaw, as currently recommended by staff, presents significant safety concerns for our members who report regular incidences of hostile, threatening and dangerous interactions with customers throughout the City of Victoria.

We are additionally concerned for the safety of those employees working in non-union cannabis dispensaries who do not have the collective power of the union to negotiate workplace protections, including minimum staffing levels. While the impact of the repeal of this Bylaw may undermine the safety of unionized budtenders, it would be felt most directly by budtenders in non-union locations.

We believe that Mayor and City Council should carefully consider the impacts of repealing this Bylaw.

**We ask that Mayor and Council ensure Cannabis Retailer locations within the City of Victoria maintain minimum staffing levels.** We ask that Council not approve the repeal of staffing levels.

Yours truly,



Kim Novak  
President, UFCW 1518