

July __, 2022

Robert Mordak
Senior Regulatory Affairs Officer, Health Canada
Email. robert.mordak@hc-sc.gc.ca
Tel. 343-543-2973

Dear Mr. Mordak:

Re: Exemption for Victoria Cannabis Buyers Club

In January 2020, the City of Victoria wrote to Health Canada to support a temporary exemption from the *Cannabis Act* for the Victoria Cannabis Buyers Club (“VCBC”). As a considerable amount of time has passed, it seems prudent to affirm and clarify that the City of Victoria wishes to assist this process and reiterates our support for the exemption.

This renewed request to grant an exemption and preserve the VCBC reflects concerns of our residents, who have expressed fear for their health and well-being if the VCBC were forced to close. It is our position that it is strongly in the public interest to allow the VCBC to transition into the legalized cannabis system without removing high-dosage products from the shelves. Given the mounting deaths from opioid overdoses, there are few potential negative consequences from granting this temporary exemption compared to the predictable and inevitable harmful outcomes that would result from the closure of the VCBC.

Attached is a letter of support for the VCBC’s exemption application signed by the top experts in substance use policy research in British Columbia. We, the City of Victoria, agree with these expert scientists and believe that all levels of government should accept the guidance of these scientists. Health Canada should begin working with this long-standing compassion club as a pilot project in an earnest effort to curb the opioid crisis and to develop an effective and accessible retail medical cannabis model.

In order to facilitate the success of this application, the City of Victoria would welcome the opportunity to participate in discussions between Health Canada and the VCBC to identify a path forward. This would provide the parties with assistance in forming and executing a plan towards full compliance with the *Cannabis Act*.

Over more than two decades of operations in Victoria, the management, staff and board of directors of the VCBC have proven their commitment to patients and to our community. The City of Victoria is prepared to do its part to ensure that the club can successfully transition into the legalized cannabis system as soon as possible.

Thank you for your time and consideration.

[signed]