



May 15, 2017

Honourable Ralph Goodale  
Minister of Public Safety  
House of Commons  
Ottawa, ON K1A 0A6

Honourable Jody Wilson-Raybould  
Minister of Justice  
Attorney General of Canada  
House of Commons  
Ottawa, ON K1A 0A6

Dear Ministers Goodale and Wilson-Raybould:

I am writing to behalf of Alberta's 271 urban municipalities to share our thoughts on Bill C-45, the *Cannabis Act*.

As the Government of Canada moves forward with the legalization of cannabis for recreational use, it will be important to exercise due care to develop and harmonize provincial regulations and municipal bylaws before the federal legislation takes effect. This will ensure that we have a comprehensive regulatory framework in place at the time of implementation that can be communicated and enforced. As we are concerned that the summer 2018 target for implementation will not allow sufficient time for this framework to be implemented, we urge you to develop a timeline that outlines how and when the various federal, provincial and municipal components will be developed.

The cost of law enforcement's testing and enforcing of impairment, including equipment and training, must be fully funded through the cannabis tax or by the federal or provincial government so that costs are not downloaded onto municipalities. Additionally, community peace officers must be a component of the enforcement activities given their role in traffic safety. These officers will require appropriate protocols and resources so they can detain potential offenders until other law enforcement agencies can validate impairment and, if necessary, lay a charge. These are just some of the many issues relating to impairment. We are therefore seeking information on the determination of impairment levels and the responsibility and processes for testing for impairment. In particular, we would appreciate further details about the provision of equipment and training and how we can be assured of admissibility in court proceedings.

In terms of the home grow of cannabis, we urge the federal government to take action to review and establish national building code standards. These standards are very important for protecting the interests of property owners, particularly condominium owners and landlords.

We appreciate the opportunity to provide feedback on this important legislation.

Sincerely,



Lisa Holmes  
AUMA President

cc: Honourable Jane Philpott, Minister, Health Canada  
Honourable Bill Blair, Parliamentary Secretary, Justice and Attorney General Canada  
Honourable Kathleen Ganley, Minister, Alberta Justice and Solicitor General  
Clark Sommerville, President, Federation of Canadian Municipalities  
Al Kemmere, President, Alberta Association of Municipal Districts and Counties