



**LEADERSHIP, ADVOCACY AND SERVICE FOR MANITOBA'S PUBLIC SCHOOL BOARDS**

January 11, 2018

Honourable Jeff Wharton, Minister, Municipal Relations  
Honourable Ian Wishart, Minister, Education and Training  
Honourable Heather Stefanson, Minister, Justice and Attorney-General

Dear Ministers:

It has been brought to the attention of the Manitoba School Boards Association that Manitoba Municipal Relations, Community and Regional Planning Office, has released a publication entitled "Zoning for Cannabis: A Guide for Municipalities". On pages 7 and 10 of that document, it proposes that municipal authorities consider buffering zones as part of the planning and evaluative criteria that should be considered prior to amending their municipal zoning by-law. While defining safe and appropriate buffering zones will be context and environmentally specific to each locale across Manitoba, it is the perspective of Manitoba's school boards that this Guide's proposed 150 to 300 metre distance for such buffer zones requires sober reconsideration.

In terms of what constitutes an appropriate distance between the proposed location of a cannabis retail outlet and a school, licensed early learning, childcare or daycare centre, or public recreational facility (which we interpret to include parks and playgrounds) in each neighbourhood and community, it is school boards' perspective that a distance of 150 to 300 metres (roughly two city blocks) will not effectively protect or prevent children from exposure to the retail of cannabis. We have therefore encouraged our municipal counterparts to consider establishing buffering zones greater than 300 metres when planning and evaluating options for amendment to their zoning by-laws. It seemed counterintuitive to us that the guide would propose a one kilometre buffering zone in between cannabis retail outlets (on page 10), while reducing this distance to less than one third (pages 7 and 10) when it comes to locations frequented by our youngest citizens and residents.

While the Manitoba School Boards Association does not purport to offer a formally defined radius that would be "safe" in terms of the distance between cannabis retailers and areas frequented by children (as it is our perspective that no exposure whatsoever to cannabis among children ought to remain a chief planning and evaluative objective), it must be considered that if one kilometre is the minimum buffer zone that is proposed under this guide between cannabis retail outlets in the same community, ought this perhaps not also be a relevant standard that should be considered and applied between a cannabis retail outlet and an area frequented by children?

While we trust that all municipal authorities will continue to make the right decisions in matters of local zoning by-law amendments, with a view to promoting the ongoing safety of, and for the minimization of cannabis harm and risk, for our children and of our local communities, school boards equally recognize that the Government of Manitoba will, through its proposed license approval procedures and processes, remain in a position to exercise its own authority to ensure that no cannabis retail outlet will ever be established less than one kilometer away from a school, licensed early learning, childcare or daycare centre, or public recreational facility (including parks and playgrounds) in each neighbourhood and community.

We therefore request that the Government of Manitoba take all necessary measures and precautions to ensure that proximity and distance are formally and duly considered by the Province and its Crown structures at the time that a cannabis retail license is being considered for approval, and that a minimum proximity of greater than one kilometre in distance be used as general guidance in terms of the relation between the location of proposed cannabis retail outlets and the location of schools, licensed early learning, childcare or daycare centre, or public recreational facility

(including parks and playgrounds) in each neighbourhood and community. We would therefore encourage that no cannabis retail license be granted if the location specified on that license is less than one kilometre in proximity to areas where children frequent. Again, the Manitoba School Boards Association in no manner intends for the suggested one kilometre distance to suggest itself as being “safe” or “responsible” for the purposes of protecting children from the risks or harms of cannabis or cannabis retail. It is our perspective that it remain a compelling public policy objective of every level of government, that our young people be protected from exposure to cannabis in a post-legalization context, whether in terms of consumption or retail.

To this end, the distance that ought to be considered between a retail outlet and areas where children frequent will remain dependent upon context and environment in each community and neighbourhood. However, if one kilometer is the buffer zone between two cannabis retail outlets as recommended by Manitoba Municipal Relations, then surely this ought to be the very same standard applied to areas where our children frequent?

In closing, we wish to thank the Government for its ongoing consultative approach on the issue of cannabis harm and risk minimization as well as concerning safe and responsible cannabis retail. The Government’s movement towards the establishment of a minimum legal age for purchased and consumption of cannabis that is greater than the minimum age of consumption for other intoxicating substances, combined with the youth-focused provisions that have already been included in both *The Cannabis Harm Reduction Act* and *The Safe and Responsible Retailing of Cannabis Act*, are greatly appreciated by all school boards.

Sincerely,



Ken Cameron  
President

Cc. CEO and Directors, Manitoba Liquor and Lotteries Commission