



May 20th, 2020

Honourable Doug Downey
Attorney General of Ontario
11th Floor, 720 Bay Street
Toronto, Ontario
M7A 2S9

Honourable Rod Phillips
Ontario Minister of Finance
7th Floor, 7 Queen's Park Crescent
Toronto, Ontario
M7A 1Y7

Re: Concentration of Cannabis Stores

Dear Attorney General Downey and Minister Phillips:

I am writing with respect to concerns that have arisen with regard to the concentration of cannabis retail operations within specific areas of my Ward 9 Davenport community and in similar communities across the City of Toronto.

My concerns, and those of many residents of my community and communities across the City, relate specifically to the provincial *Cannabis Control Act* and the *Cannabis Licence Act*. We recognize that municipalities, including Toronto, had until January 22nd, 2019 to either opt in or out of the authorization process to permit cannabis retail establishments within their cities. While the City of Toronto opted in based on practical and realistic considerations there has since that time been growing concerns about the inability of municipalities to effectively regulate the location of these retail operations, more specifically the congregation of these outlets.

We recognize that provisions were added to ensure that these cannabis retail outlets were not situated within an unacceptable distance of schools and this is of course a fully necessary provision of the law. However, it is clear that further mechanisms must be established to allow municipalities such as Toronto to exercise increased control of where these outlets can operate, most importantly with respect to the congregating of stores in a limited area.



-2-

Within my own community we are witnessing situations where several cannabis outlets are locating within a very short distance of each other.

These cannabis retail establishments have substantially more resources available to them than other retailers and therefore invariably are positioning themselves in a manner that undermines the opportunities for more diverse retail environments particularly along main streets with storefronts exiting onto these thoroughfares. The fact that multiple cannabis outlets are locating in a relatively small space is having impacts on existing retail and creating concerns for residential communities adjacent to them.

I would emphasize that those residents and retailers expressing concerns to me are not opposed to cannabis retail outlets in their communities, in fact they understand and accept that this is a reality now with which they are prepared to accept. However, as noted the concern is with regard to congregating outlets in relatively small areas.

As you know, under existing provincial legislation, municipalities such as Toronto have very little or no means, outside of school considerations, to impact decisions concerning locations of cannabis outlets.

By way of this letter, I am asking that the province review and reconsider the legislation that deals with cannabis retail outlets in the context of providing to municipalities the tools to manage the issue of congregating establishments. To reiterate, the objective is not to prevent establishments from opening in a given area but to afford municipalities such as Toronto the tools to ensure that beyond school considerations they can prevent a congregation of these outlets in a relatively small area. Properly located, these cannabis outlets can operate collaboratively with local communities and Business Improvement Associations. However, under the law as it is presently constituted this is simply not the case.

I look forward to hearing from you promptly on this issue as we are experiencing these concerns in the present time and would like to be able to address these practices as soon as possible.

Yours truly,

Ana Bailão
Deputy Mayor,
Chair, Planning and Housing Committee
Councillor – Ward 9, Davenport



anabailão
TORONTO **DAVENPORT**
CITY COUNCILLOR



cc. Mayor John Tory
City of Toronto

Chris Murray
City Manager, City of Toronto

Tracey Cook
Deputy City Manager