



1695 Chiefswood Rd • PO Box 5000 • Ohsweken ON N0A 1M0

## LICENSING PROCESS FOR CULTIVATION AND MANUFACTURING LICENCES

The following outlines the licensing process for cultivation and manufacturing activities on the Six Nations of the Grand River Territory. The licensing process for cannabis retail sales will be provided at the time Applications for Retail Licences are available.

### Application Phase I

#### Phase I Consultation

Applicants interested in obtaining a licence to produce cannabis pursuant to the Six Nations Cannabis Control Law (as it is currently being amended) are required to meet with Six Nations Cannabis Commission representatives to discuss their proposal, and preliminary site and applicant eligibility criteria. Prior to attending the consultation, the applicant must complete the Proposal Overview Form, including the Concept Plan requirements as set out in Appendix A. Based on the proposed activities, the Commission will identify the appropriate licence type(s) (i.e., Cultivation and/or Manufacturing). The location details will be used for initial site-suitability screening. In addition, to verify applicant eligibility, the applicant must bring a Certificate of Possession or land-owner consent form for all Certificate of Possession holder(s), copies of status cards from all persons having a direct or indirect ownership in the applicant entity (the “Owners”), and signed verification consent to contact Six Nations Lands/ Membership to verify Band Membership of the Owners of the applicant entity, and the validity of the Certificate of Possession(s) where the site will be situated. The consultation will assist the applicant in understanding the application process as well as provide the Phase I application documents required for initial screening process. At the meeting, the applicant may be advised to obtain the support of professionals such as planners, surveyors, consultants, engineers, architects, lawyers, etc. in order to complete the necessary components of the application. A list of documents required for Phase I is available in Section G of the Proposal Overview Form and in the Appendix of this document. A Phase I application processing fee of \$5,000 must be paid by the applicant to the Six Nations Cannabis Commission at the time of the application consultation meeting. To request a Phase I Consultation please contact [licensing@sncannabis.com](mailto:licensing@sncannabis.com).

#### Initial Assessment – Site Screening and Band Membership Check

Following the Phase I Consultation meeting, the Commission will conduct an initial site screening that involves a high-level screening of the proposed site location to ensure it is not within close proximity to sensitive sites. In addition, Certificate of Possession verifications and Band Membership checks of all the Owners of the applicant entity will be conducted.

#### Environmental Site Assessment

Following confirmation of Band Membership of the Owners of the applicant entity and the validity of the Certificate of Possession(s) where the site will be situated and determining the site passes the high-level suitability screening, the Commission will conduct an in-depth environmental site assessment of the proposed site location to evaluate potential ecological impacts of the proposed activities and prepare a

detailed report of the findings. The report will include recommendations for environmental management prescriptions. In cases where severe impacts are identified, an environmental management plan may be required to achieve ongoing compliance with the environmental management prescriptions. The environmental site assessment requires a representative of the Commission to travel to the specified site to ensure that the physical location is consistent with the screening data.

### **Public Notice Period**

Upon a successful in-depth screening of the proposed site location, the application will enter a 15-day public notice period. During this time, the applicant must post a placard in a conspicuous location on the proposed property. Notices will also be circulated to residents in close proximity to the proposed site to elicit responses supporting or opposing the project. The feedback will be shared with the applicant, giving them an opportunity to address any stated concerns.

### **Phase I Cannabis Commission Decision**

The commission will make a decision on whether the application can proceed as submitted to the second phase of the process based on (a) confirmation of Six Nations Band Membership of the Owners of the applicant entity, (b) validity of the Certificate of Possession(s) related to the site, (c) the results of the site-suitability assessment, and (d) whether public submissions have identified any issues that make the applicant ineligible to receive a licence in accordance with the eligibility requirements to be specified in the Six Nations Cannabis Control Law.

## **Application Phase II**

### **Phase II Consultation**

Following the Commission's decision made at the conclusion of Phase I that an application can proceed, the applicant will be invited to attend a Phase II Consultation to discuss the Phase II application process and submit the required Phase II application documents, including security clearance applications for key individuals and the cannabis licence application documents as discussed below. A full list of required Phase II documents is available in Appendix B of the Proposal Overview Form and in the Appendix of this document. A Phase II application processing fee of \$15,000 must be paid by the applicant to the Six Nations Cannabis Commission at the time of the application consultation meeting

### **Security Clearance Application Submission**

Key personnel must undergo a background check to ensure that the application does not pose a risk to public health or safety. All owners, directors, officers and other key individuals involved with the application entity are required to undergo a comprehensive background check. As part of the security clearance process, background check requests must be submitted to the local Six Nations Police and in conjunction with the RCMP/OPP, as applicable. The applicant shall be responsible for payment for its costs to process security clearances with the Commission and law enforcement. The Six Nations Cannabis Commission must determine that all required security clearances have been granted before the Confirmation of Readiness can be granted.

### **Phase II Document Review**

Following receipt of the Phase II application documents, the Six Nations Cannabis Commission will review the application for completeness. The applicant will be notified of any missing information or documentation and will be requested to provide such missing information or documentation. Once the submission package is deemed to be complete, the Six Nations Cannabis Commission performs a detailed review of the Cannabis Production Application Form and all supporting documents. The goal of

the review is for the Commission to evaluate the entire application in accordance with the Six Nations Cannabis Control Law to ensure the applicant has proposed facility and operational plans that meet the community's priorities of ensuring health and safety.

### **Requests for Information**

In the event that clarity is needed or information is missing in the Phase II application document submission, the Six Nations Cannabis Commission will send the applicant a formal request for more information that outlines any further information and documentation required. There may be multiple rounds of requests for more information during the review process. The Commission's review of the Phase II document submission is performed in parallel with the security clearance application processing conducted by law enforcement.

### **Security Clearance Processing**

Following receipt of the security clearance applications, the Commission and law enforcement conducts a thorough check of each individual's background. If there is missing information or clarification is required, the respective individual will be contacted directly.

### **Confirmation of Readiness**

Once the Six Nations Cannabis Commission completes its review of the applicant's Phase II application documents including all requested additional information and documentation that is found to be sufficient, and security clearances have been successfully reviewed, the Commission will provide the applicant with a Confirmation of Readiness notification that informs the applicant that construction can be initiated based on the facility and operational designs proposed in the application. The applicant is required to comply with the Ontario Building Code in building the facility

### **Facility Construction**

Once the Confirmation of Readiness is issued, the applicant can begin construction of their proposed facility as outlined in their application. The Commission must be notified of any deviations from the construction plans, including but not limited to floor plan, site security designs, construction materials, and construction environmental management plans. It is expected that the applicant will adhere to all required building inspection schedules.

### **Interim Facility Inspection**

The applicant must notify the Commission at the approximate mid-point of the facility construction schedule. The Commission's inspectors will coordinate with the applicant to schedule a visit at the specified site to conduct an interim inspection of the facility and its operations to ensure the construction is aligned with what was submitted in the Land Use Application and Cannabis Production Application. During this time, the applicant will have the opportunity to ask any outstanding questions as it pertains to the overall compliance of the facility and its operations. Following the inspection, the Commission's inspectors will prepare a summary report with their findings and provide it to the Six Nations Cannabis Commission for review. The Commission will notify the applicant of the findings and the applicant will be required to address all deficiencies.

### **Final Facility Inspection**

Once construction is completed, the applicant must notify the Six Nations Cannabis Commission and request a final inspection. The Six Nations Cannabis Commission will inform the applicant when the inspection will take place and will provide the applicant with a list of information to provide to the Six Nations Cannabis Commission in preparation for the inspection. During the inspection, the assigned Commission inspectors will assess all areas of the facility and operations, including but not limited to, construction materials used, security systems installed, and quality management and inventory tracking systems. Following the inspection, the Commission inspectors will prepare a report with their findings

and provide it to the Six Nations Cannabis Commission for further review and consideration. The applicant will be notified if the inspection indicates that aspects of the facility or planned operations are non-compliant with the Six Nations Cannabis Control Law, or its regulations, or if more information is required. The applicant will be required to address all deficiencies.

#### **Commission Licence Issuance Decision**

Following the review and acceptance of all information, including the observations and results from the inspection, and confirmation that all security clearances have been granted, the Six Nations Cannabis Commission will issue the applicable licence (i.e., Cultivation and/or Manufacturing licence) to the applicant that allows for the conduct of specified cannabis activities and indicates that the applicant is now a licence holder. The Six Nations Cannabis Commission will mail a hard copy of the licence to the licence holder's mailing address.

#### **Post-Licensing Meeting**

Upon licence issuance, the Six Nations Cannabis Commission will contact the licence holder to schedule a teleconference to discuss the licence, including any conditions. At this time, the licence holder will have an opportunity to ask the Six Nations Cannabis Commission any questions pertaining to the licence and their regulatory obligations.

#### **Sales Amendment Submission**

In order to sell finished packaged cannabis product to an authorized cannabis retail store, and for the Commission to ensure product quality and safety for consumer consumption, licence holders must apply to amend their initial Cultivation and/or Manufacturing licence. A Cultivator I amendment allows for the ability to sell dry flower, a Manufacturer I amendment allows for the ability to sell dry flower and topicals, and a Manufacturer II amendment allows for the ability to sell all cannabis classes. To apply for a sales amendment, licence holders must complete a minimum of two (2) production runs that are representative of each class of cannabis product and at the production scale that it intends to produce for sale. Documentation pertaining to the process for each production run, including production records, product testing results, packaging and labelling specifications, and standard operating procedures are to be submitted to the Six Nations Cannabis Commission for review. The applicant must remit payment to the Commission for its costs to process the sales amendment application. The applicant will be notified of any missing information or deficiencies to be addressed, however deficiencies that indicate concern for product quality and safety will terminate the application. The applicant will be notified of any application refusals. Should the licence holder wish to reapply, a new sales amendment package detailing information for additional production runs can be submitted to the Commission.

#### **Sales Amendment Inspection**

Once the Six Nations Cannabis Commission completes its review of the applicant's Sales Amendment Submission and all requested additional information and documentation are found to be sufficient, the Commission's inspectors will coordinate with the applicant to schedule a visit at the site to conduct an inspection of the production runs and operating conditions. Following the inspection, the Commission inspectors will prepare a report with their findings and provide it to the Six Nations Cannabis Commission for further review and consideration. The applicant will be notified if the inspection indicates that aspects of the production are non-compliant with the Six Nations Cannabis Control Law, or its regulations and standards, or if more information is required. The applicant will be required to address any reasonable deficiencies, however deficiencies that indicate concern for product quality and safety will terminate the application. The applicant will be notified of any application refusals. Should the licence holder wish to reapply, a new sales amendment package detailing information for additional production runs can be submitted to the Commission.

### **Sales Amendment Issuance**

Following the review and acceptance of all information, including the observations and results from the inspection, the Six Nations Cannabis Commission will issue the applicable amended licence that allows for the activity of sales of the specified class(es) of cannabis product. The Commission will mail a hard copy of the amended licence to the licence holder's mailing address.

### **Ongoing Compliance**

Following the commencement of operations, the licence holder will be subject to ongoing compliance inspections both on a scheduled and ad hoc basis. Frequency and scope of inspections are to be determined by the Six Nations Cannabis Commission.

### **Appendix: Required Application Documents**

#### **Phase I Documents:**

Proposal Overview Form  
Status cards for all owners of the applicant entity  
Six Nations Lands/Membership Band Membership verification consent (all owners)  
Certificate of Possession for proposed licensed site  
Land-owner consent form for all Certificate of Possession holder(s)  
Six Nations Lands/Membership Certificate of Possession verification consent  
Constituting documents for applicant (if applicable)  
All existing third-party agreements with the applicant entity  
Corporate schematic diagram displaying entities affiliated with applicant  
Concept Plan

#### **Phase II Documents:**

Facility Standards Compliance Form  
Phase II application processing fees  
List of standard operating procedures  
List of record-keeping practices  
Security clearance application forms  
Site survey of subject property  
Environmental risk mitigation strategy (if applicable)  
Lease/land use agreement (if applicable)  
Corporate responsibility plan (if applicable)  
Six Nations consultation and engagement plan (if applicable)  
Broader public consultation and engagement plan (if applicable)  
Updated third-party agreements with the applicant (if applicable)  
Qualified person report (if applicable)



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# CANNABIS PRODUCTION APPLICATION

## Proposal Overview Form

**Purpose:** This form gathers the business information required to assist in the initial screening to ensure site-suitability for the proposed project and to verify that the Owner(s) are Six Nations of the Grand River Band Members. Applicants looking to obtain a cannabis production licence must schedule an application consultation meeting. Production refers to either indoor Cultivation (growing cannabis) or Manufacturing (producing cannabis products by means other than growing). If the Business Overview Form is incomplete when it is submitted it will be returned to the applicant without full review. If the Business Overview Form is complete it will be reviewed by the Six Nations Cannabis Commission which may result in a request for further information or documentation to verify ownership status and assess site-suitability. Upon successful review of the Business Overview Form, the applicant will be contacted by the Six Nations Cannabis Commission to begin the in-depth site suitability inspection.

Applicants will be required to fill out the Business Overview Form prior to attending their application consultation meeting. A Phase I application processing fee of \$5000 must be paid by the applicant to the Six Nations Cannabis Commission at the time of the application consultation meeting.

Please note that all projects are required to comply with the Ontario Building Code.

### Section A: Applicant Information

<b>1. Legal Name of Applicant:</b>	<b>2. Doing Business As:</b>
<b>3. Type of Applicant (check box):</b>	
<input type="checkbox"/> Individual/Sole Proprietorship <input type="checkbox"/> Corporation <input type="checkbox"/> Limited Partnership	<input type="checkbox"/> Spousal Co-ownership <input type="checkbox"/> General Partnership <input type="checkbox"/> Joint Venture (contractual)
<b>4. Business Address of Applicant (include blue number/street address):</b>	
<b>5. Mailing/Shipping Address of Applicant (if different from above):</b>	

<b>6. Website Address (if applicable):</b>
<b>7. Name of Primary Contact:</b>
<b>8. Relationship of Primary Contact to Applicant:</b>
<b>9. Phone Number of Primary Contact:</b>
<b>10. Fax Number of Primary Contact:</b>
<b>11. Email of Primary Contact:</b>
<b>12. Mailing Address of Primary Contact:</b>
<b>13. Preferred Method of Contact:</b> <input type="checkbox"/> Phone <input type="checkbox"/> Fax <input type="checkbox"/> Email <input type="checkbox"/> Mail

All individuals with a direct or indirect ownership interest in the applicant must be Six Nations of the Grand River Band Members. Please complete the following table to outline details of all individuals with an ownership stake in the applicant. Copies of Status Cards for all Owners must be included with the Business Overview Form upon submission.

**1. Names and residential addresses of Applicant Ownership:**

Legal Name	Role (owner, partner, director, direct or indirect shareholder)	Address	Owner%	Six Nations Band Member (Y/ N)

(Attach additional sheets if necessary)

NOTE: If a Shareholder, Partner or Joint Venturer of the Applicant is a Corporation or a Partnership, then you must attach a schematic diagram depicting the relationship (including % ownership) between all parent, controlling, subsidiary or affiliated companies, partnerships or joint venture entities up to and including their ultimate individual owners.

**15. Names and residential addresses of the Directors and Officers of the Applicant:**

Legal Name	Address	Director (Y/N)	Officer (Y/N)	Officer Role (if applicable)

(Attach additional sheets if necessary)

<p><b>16. Has the applicant entered into any third-party agreements relating to the cannabis business?</b></p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>
<p><b>17. Does the applicant intend to enter into any third-party agreements relating to the cannabis business?</b></p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>
<p><b>18. Do the applicant or any of the owners have an ownership stake in a cannabis retail store?</b></p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No</p>

NOTE: third-party agreements include, but are not limited to, those involving consulting, revenue-sharing, operation services, franchising, financing, control, marketing. This includes, but is not limited to, agreements of purchase and sale of equity interest in the applicant, shareholder agreements, options agreements, debt instruments, agreements governing operations or management, franchise agreements, licensing agreements, service contracts, consulting agreements, convertible debentures, other options, revenue sharing agreements, partnership agreements, leasing agreements, and trusts.

Any parties with a financial and/or beneficial interest in the applicant, or the operations or proposed operations of the applicant, are required to provide disclosure as part of the application for a Cannabis Licence from the Six Nations Cannabis Commission.

Please be advised that all applicants and licensees have a continuing responsibility to notify the commission in writing of any material changes to the information supplied in its application.



## Section B: Proposed Site Information

**19. Provide the address of the proposed site.**

**20. Provide GPS coordinates for the proposed site.**

**21. Provide name(s) of Certificate of Possession holder(s) where site is to be situated.**

**22. Residential address of Certificate of Possession holder(s).**

**23. Phone number of Certificate of Possession holder(s).**

Certificate of Possession(s) and consent from the Certificate of Possession holder(s) must be included with the Business Overview Form upon submission. Any lease or land-use agreement between the applicant and the Certificate of Possession holder(s) must be included with Phase II.

**24. Describe the current use of the property and the duration of that use.**

**25. Provide past uses for the property and the duration of those uses.**

**26. Is this site a place of residence?**

yes       no

**27. Describe water source for proposed operations.**

**28. Describe power source that is sufficient for operations including any on-site generation.**

**29. Describe stormwater drainage (sewers, ditches, swales, others).**

**30. Describe road access (provincial highway, municipal road, right of way).**

Applicant must provide a Concept Plan in Phase I (see Appendix A). A site survey will be required for Phase II of the application (see Appendix B).

**31. Adjacent activities: Indicate the distance to the closest instance of each of the following from proposed location within 1 km.**

**School:**

**Daycare:**

**Railway:**

**Agricultural use:**

**Airport:**

**Industrial use:**

**Recreational area:**

**Well:**

**Provincial or National Park:**

**Commercial use:**

**Utility Corridor:**

**Aquifer Recharge Zone:**

**Neighbouring Residence:**

**32. Describe unique topological or environmental features on the land.**

**33. Will any trees need to be removed for the proposed project?**

- Yes       No       Unsure

**34. Does the proposed location contain a Carolinian forest?**

- Yes       No       Unsure

**35. Describe the dominant soil type:**

**36. Are any of the buildings on the Subject Property currently a place of residence?**

- Yes       No       Unsure

**37. Are there any wetlands on the subject property or on adjacent properties?**

- Yes       No       Unsure

**38. Are there any creeks, streams, or rivers on the subject property or on adjacent properties?**

- Yes       No       Unsure

**39. Are there any Federally or Provincially identified species at risk or significant wildlife habitat on the subject property?**

- Yes       No       Unsure

**40. Do any migratory birds use the subject property at any time during the year?**

- Yes       No       Unsure

## Section C: Proposed Licensed Operations

**41. Describe the proposed cannabis activities:**

**42. Select cannabis products to be produced:**

- |   |  |
|---|--|
| <input type="checkbox"/> Plants and Seeds | <input type="checkbox"/> Dried Cannabis    |
| <input type="checkbox"/> Topical Cannabis | <input type="checkbox"/> Cannabis Extracts |
| <input type="checkbox"/> Edible Cannabis  | <input type="checkbox"/> CBD only products |

**43. Cannabis Licence(s) sought by applicant:**

- |                                      |  |  |
|--------------------------------------|--|--|
| <input type="checkbox"/> Cultivation | <input type="checkbox"/> Manufacturing | <input type="checkbox"/> Cultivation and Manufacturing |
|--------------------------------------|--|--|

**44. Describe the cannabis extraction methods, if any, that will be employed.**

**45. Provide the estimated water consumption for the facility (litres per day).**

**46. Describe how wastewater will be disposed of from the facility.**

**47. Describe any water-recycling measures that will be implemented.**

**48. What is the estimated number of cannabis plants that will be on site?**

## Section D: Indigenous Traditional/Cultural Uses

49. Describe any cultural, historical or archaeological sites within 1 km of the proposed site.

50. Describe any traditional-use areas withing 1 km of the proposed site.

## Section E: Indigenous Consultation and Public Participation

51. Does the Applicant understand that it is responsible for the preparation of a Consultation and Engagement Plan for Six Nations of the Grand River?

Yes       No

52. Are there potential off-reserve impacts from the proposed operations?

Yes       No

53. If YES, does the Applicant understand that it is responsible for the preparation of a Consultation and Engagement Plan for the broader public?

Yes       No

## Section F: Comments and Other Information

16. Use this space to add any additional comments or information relevant to the project.



## Section G: Phase I Application Documents

Attached Document:	Attached (Y/N)
Business Overview Form	
Status cards for all owners of the applicant entity	
Six Nations Lands/Membership Band Membership verification consent (all owners)	
Certificate of Possession for proposed licensed site	
Land-owner consent form for all Certificate of Possession holder(s)	
Six Nations Lands/Membership Certificate of Possession verification consent	
Constituting documents (i.e. articles or letters patent) for applicant (if applicable)	
All existing third-party agreements with the applicant entity	
Corporate schematic diagram displaying entities affiliated with applicant	
Concept Plan (see Appendix A)	

## Section H: Authorization by Agent or by Applicant

\*

### Relationship of person signing the Application to the Applicant

Nature of agent or authorized representative relationship to Applicant (check box):

- Owner or co-owner of the Applicant       Director, officer, or employee of the Applicant  
 Legal or other advisor of the Applicant       Other \_\_\_\_\_

Telephone Number: (\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_ Fax Number: (\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_

Cell Number: (\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_ Email address: \_\_\_\_\_

**Note: The following Agent Authorization is required only where the person signing the form is NOT an Applicant individual or a Director, Officer or Employee of an Applicant corporation that is authorized by the corporation to legally bind it.**

### Agent Authorization by individual Applicant or Director / Officer of the Applicant entity

I \_\_\_\_\_, being the individual Applicant or a Director or Officer authorized to bind the Applicant entity, hereby authorize \_\_\_\_\_ to act as the agent of the Applicant in all matters related to this Application.

Dated this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_  
(Day) (Month) (Year)

\_\_\_\_\_  
Signature of Applicant or Director / Officer of the Applicant entity authorized to bind the Applicant

### Statutory Declaration by Applicant or Authorized Agent

I \_\_\_\_\_, of the \_\_\_\_\_ in  
(Name) (Name of Municipality)

the province of \_\_\_\_\_

**SOLEMNLY DECLARE THAT**

The information provided in this Application is true.

AND I make this solemn Declaration conscientiously believing it to be true and knowing that it is of the same force and effect as if made under oath.

Declared before me at the \_\_\_\_\_ in  
(Name of Municipality)

the province of \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_.  
(Day) (Month) (Year)

\_\_\_\_\_  
A Commissioner of Oaths (Notary or Lawyer)

\_\_\_\_\_  
Applicant or Authorized Agent



## **Appendix A: Concept Plan Requirements**

Please provide a minimum of one copy of a concept plan, or sketch/survey in both paper format and digitally in PDF format:

1. Appropriate map reference scale
2. The boundaries and dimensions of the Subject Property
3. The location, size and type of all existing and proposed buildings and structures on the subject land, along with the setbacks from the street line, rear and side lot lines
4. The approximate location of natural and artificial features on the subject and abutting lands that may affect the application (such as buildings, railways, roads, watercourses, drainage ditches, river or stream bank, wetlands, wooded areas, wells, septic tanks, walkways, driveways, trees, parking areas, etc.)
5. The current uses of the abutting lands
6. The location, width and name of any roads within or abutting the subject lands, and whether such is an unopened road allowance, public travelled road, a private road or a right-of-way
7. If access is by water only, the location of the parking and docking facilities to be used
8. The location and nature of any easement affecting the subject land; and
9. North Arrow

## **Appendix B: Phase II Application Documents**

These documents will not be required to be provided by the applicant to the commission until the applicant has successfully passed through Phase I of the application process.

Facility Standards Compliance Form  
Phase II application processing fees  
List of standard operating procedures  
List of record-keeping practices  
Security clearance application forms  
Site survey of subject property  
Environmental risk mitigation strategy (if applicable)  
Lease/land use agreement (if applicable)  
Corporate responsibility plan (if applicable)  
Six Nations consultation and engagement plan (if applicable)  
Broader public consultation and engagement plan (if applicable)  
Updated third-party agreements with the applicant (if applicable)  
Qualified person report (if applicable)

**ADDITIONAL MATERIALS MAY BE REQUESTED FOLLOWING THE REVIEW OF THIS APPLICATION**



# FACILITY STANDARDS

This document provides an overview of the production and physical security requirements that facilities licensed by Six Nations Cannabis Commission must adhere to. These standards are designed to protect the health and safety of the community and of workers within the facility as well as to prevent the diversion of cannabis into the illicit market. All facilities must be compliant with the Ontario Building Code.

## PART A: FACILITY PRODUCTION STANDARDS

This section outlines the standards required in the design, construction and buildout of the facility to ensure that cannabis production, processing, and storage meet the expected quality standards.

### Definitions:

**Cannabis:** Material derived from or otherwise identical to that of a cannabis plant, excluding bare stalks and roots.

**Cannabis Activity/Activities:** Any activity that involves cannabis, including cultivation, production, manufacturing, processing, packaging, labelling, sale, distribution, storage, destruction, and sanitation.

**Contaminant:** A microbiological organism, chemical compound, or extraneous material with a noxious or deleterious effect.

**Incompatible Activities:** Activities that pose a risk to the quality of cannabis or cannabis products being produced.

## Air Treatment, Ventilation, and Environmental Controls

1. Areas within the facility in which cannabis activities are present designed with adequate air treatment, ventilation, and environmental control system.
  - a. Air Treatment:
    - i. Air entering the facility must be treated to prevent the entry of contaminants.
    - ii. Circulated air within the facility must be treated to maintain a level of quality that is appropriate for the cannabis activities being conducted.
    - iii. Air exiting the facility must be treated to prevent the emission of odour or contaminants.
    - iv. The air treatment system must be in good working order and any filters must be regularly evaluated and replaced if necessary.

b. Ventilation

- i. Natural and mechanical ventilation is used for sufficient air exchange within cannabis activity areas to provide clean air and remove unclean air.
- ii. The ventilation system prevents the accumulation of heat, steam, condensation, or dust within the facility.
- iii. The ventilation system is constructed in a manner that makes it accessible for cleaning.
- iv. The ventilation system is in good working order and is cleaned on a regular schedule.

c. Temperature, Lighting and Humidity

- i. The facility temperature, lighting and humidity are monitored and controlled to maintain the quality of cannabis and ingredients.

## **Water Supply**

- 2. The water supply must not pose a risk to cannabis or other ingredients used in the production of cannabis.
  - a. The water supply is purified to a level reasonable for the cannabis activity being conducted. If the water supply is a required ingredient, the water must be potable as per the Canadian Drinking Water Guidelines.
  - b. Measures must be in place to prevent backflow of water.
  - c. Measures must be in place to prevent contamination of treated water by untreated or undertreated water.
  - d. The water supply must be tested for microbiological and chemical contaminants on a schedule appropriate for its intended use.

## **Building Design and Construction**

- 3. The building is designed and constructed to ensure cannabis and cannabis ingredients are not exposed to contaminants.
  - a. Building Design
    - i. The building is designed to accommodate physical separation of incompatible activities.
    - ii. The building is designed to minimize infiltration by dust, dirt, debris, and other contaminants.
    - iii. The building is designed to be effective in separating cannabis and ingredients used in cannabis activities from sanitizers, agronomic inputs and non-chemical agents.

- iv. The building is designed to have an effective waste storage unit for waste cannabis and other cannabis contaminated materials intended for destruction.
- v. The building is designed to allow for a physically separate storage room that maintains the quality of stored cannabis.
- vi. The building is designed to allow for the donning of personal protective equipment in a sanitary area before entry into areas containing cannabis.
- vii. The building is designed to have effective and accessible handwashing, hand sanitizing, and equipment washing areas that is separate from cannabis activity areas.
- viii. The building is designed to prevent exterior doors leading directly into areas containing cannabis, other than in the shipping and receiving areas, unless used for emergency purposes only.
- ix. The building is designed to optimize the flow of materials, including cannabis and ingredients, while minimizing the movement of personnel and taking into consideration the sequence of operations and the various levels of cleanliness required.

b. Building Construction

- i. The building is constructed to facilitate order, maintenance, cleaning and sanitary operations with safe cleaning and disinfecting solutions suitable for its intended use.
- ii. The walls, floor and ceiling materials are smooth, non-porous, non-shedding, and durable with no exposed seams or joints. The materials are durable and can withstand repeated cleaning without deterioration.
- iii. Wall, floor and ceiling surfaces where cannabis activities take place are in good condition, without cracks, holes, or wear.
- iv. The facility is constructed (roof, air intakes, foundation, walls, floors, drains, doors, and windows) to control and prevent animals and pests from entering the facility.
- v. The drains and floors are constructed to prevent the pooling of water or other substances within the cannabis activity rooms.
- vi. The lighting fixtures are installed as per manufacturer standards and are shatter resistant and shielded.
- vii. Equipment, including conveyances, are installed, used and maintained as per manufacturer standards and prevents the contamination of cannabis and ingredients.

**Facility Exterior Area**

- 4. The land surrounding the facility is monitored, controlled, and maintained to prevent cross-contamination and presence of animals.
  - a. Animal Presence Preventative Measures

- i. The area immediately surrounding the facility is maintained to keep area clear of animals and pests.
  - ii. The building is designed to minimize infiltration by pests, including animals and insects.
- b. Facility Exterior
  - i. The facility exterior surfaces are maintained to minimize risk of infiltration by water or contaminants.
- c. Surrounding Area
  - i. The surrounding land is maintained, monitored, and kept free of debris and refuse.
  - ii. Waste containers are removed frequently to prevent an overflow of waste cannabis and/or cannabis-contaminated material after it has been destroyed.
  - iii. Waste containers are secured to prevent access by animals or pests.
  - iv. Drainage surrounding the facility is sufficient to prevent pooling of water.

## **PART B: FACILITY PHYSICAL SECURITY STANDARDS**

This section outlines the standards required in the physical security measures of the facility to ensure that the site is adequately secured and safeguarded at all times to protect public safety and to minimize the risks of cannabis diversion.

### **Definitions:**

**Cannabis Activity/Activities:** Any activity that involves cannabis, including cultivation, production, manufacturing, processing, packaging, labelling, sale, distribution, storage, destruction, and sanitation.

### **Physical Barriers**

1. Construction
  - a. The facility is designed to prevent unauthorized entry.
  - b. Window and doors are secured against unauthorized entry.
  - c. Vents and other openings are designed to prevent unauthorized entry.
2. Location
  - a. All areas in which cannabis activities occur must be entirely surrounded by a physical barrier that prevents unauthorized access.
  - b. The immediate area surrounding the facility is clear of structures or trees that would assist in granting unauthorized access onto or into the facility.

### **Visual Monitoring, Intrusion Detection, and Access Control**

3. Visual Monitoring
  - a. The following areas must be monitored by visual monitoring systems at all times:
    - i. All entrances and exits to the facility, including emergency exits and shipping and receiving doors.
    - ii. The perimeter of the facility.
    - iii. Rooms that contain cannabis.
  - b. Visual monitoring must not be obstructed by permanent or temporary equipment.
  - c. Visual monitoring systems must adequately capture activity in all lighting and weather conditions.
4. Intrusion Detection
  - a. Intrusion detection systems must be designed to cover all areas within the facility where cannabis activities occur to detect unauthorized access at all times.

5. Access Control

- a. All areas where cannabis activities occur must have access control that functions at all times and that allows entry only by authorized individuals.

#### 6. Access Tracking

- a. A record of individuals entering and exiting a room where cannabis activities occurs must be maintained.

#### 7. Records

- a. Visual monitoring records must be retained for a minimum of one (1) year.
- b. All records of access tracking must be retained for a minimum of two (2) years.
- c. All records of security breaches or incidents must be retained for a minimum of two (2) years.
- d. All security records must be kept in a secure room with restricted access to authorized personnel only.

#### 8. Backup Power

- a. All security devices must be connected to an emergency power source that immediately activates in the event of a power outage.
- b. The security system must be equipped with an uninterruptible power supply to maintain the system while backup power is initiating.

#### 9. Cannabis Activity Rooms

- a. Rooms in which there is cannabis activity must be restricted to authorized personnel only.
  - i. All access points to these rooms must have access control and/or restriction devices (e.g. proximity readers or keypads, door lock and key).
  - ii. Access credentials and permissions are granted to individuals whose presence is required by their duties.



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# FACILITY STANDARDS COMPLIANCE FORM

Applicants are required to complete the following form to demonstrate their compliance with each of the requirements as set out in the Facility Standards document. The applicant must provide the additional documents outlined in the Appendix of this form. The completed form must be submitted at the Phase II Consultation with the Six Nations Cannabis Commission. Additional blank sheets can be attached as required if the provided space is insufficient, noted with the question number as it appears on this form.

## PART A: COMPLIANCE WITH FACILITY PRODUCTION STANDARDS

This section outlines how the applicant meets the standards required in the design, construction and buildout of the facility to ensure that cannabis production, processing, and storage meet the expected quality standards.

### 1. Air Treatment

Describe how the applicant facility will meet requirements 1(a)(i)-(iv).

### 2. Ventilation

Describe how the applicant facility will meet requirements 1(b)(i)-(iv).

### 3. Environmental Controls.

Describe how the applicant facility will meet requirement 1(c)(i).



**4. Water Supply**

Describe how the applicant facility will meet requirements 2(a)-(d).

**5. Building Design**

Describe how the applicant facility will meet requirements 3(a)(i)-(ix)

**6. Building Construction**

Describe how the applicant facility will meet requirements 3(b)(i)-(vii)

**PART B: COMPLIANCE WITH FACILITY SECURITY STANDARDS**

This section outlines how the applicant meets the standards required in the physical security measures of the facility to ensure that the site is adequately secured and safeguarded at all times to protect public safety and to minimize the risks of cannabis diversion.

**7. Construction**

Describe how the applicant facility will meet requirements 1(a)-(c).

**8. Location**

Describe how the applicant facility will meet requirements 2(a)-(b).

**9. Visual Monitoring**

Describe how the applicant facility will meet requirements 3(a)(i)-(iii), 3(b), and 3(c).

**10. Intrusion Detection**

Describe how the applicant facility will meet requirement 4(a).

**11. Access Control**

Describe how the applicant facility will meet requirement 5(a).

**12. Access Tracking**

Describe how the applicant facility will meet requirement 6(a).

**13. Records**

Describe how the applicant facility will meet requirements 7(a)-(d).

**14. Backup Power**

Describe how the applicant facility will meet requirements 8(a)-(b).

**15. Cannabis Activity Rooms**

Describe how the applicant facility will meet requirements 9(a)(i)-(ii).

## **Appendix: Facility Compliance Supplemental Documents**

The following documents must be attached to this form before submission to the Six Nations Cannabis Commission at the Phase II Consultation.

1. A floor plan of the proposed facility with named rooms.
2. A detailed description of the activities that will occur in each room (Note which rooms will have cannabis, where cannabis will be received/shipped, cultivated, dried, trimmed, processed, packaged, stored, destroyed, etc.)
3. A floor plan depicting the air ducts, ventilation, HVAC units and filters displayed.
4. A floor plan depicting security device types and locations (cameras, intrusion detection devices, access control devices, and door devices) displayed.
5. Specification sheets for security devices.
6. Specification sheets for surface materials that will be used to satisfy production standards.

# Cannabis Production Licence Application Overview



## Phase I Consultation

Applicant must attend meeting to discuss details of application process and provide Phase I application documents required for initial screening process. Contact [licensing@sncannabis.com](mailto:licensing@sncannabis.com).

## Site Screening

The proposed site location will undergo a high-level screening to ensure it is not within close proximity to sensitive sites.

## Environmental Assessment

The proposed site location will undergo a physical inspection to evaluate potential ecological impacts of the proposed activities.

## Security Clearance Application

Key personnel must undergo a background check to ensure that the application does not pose a risk to public health or safety.

## Clearance Processing

Security clearances are processed at the same time as the licence application. Clearances are valid for 5 years.

## Confirmation of Readiness

Once the application details and security clearances have been successfully reviewed, the applicant receives approval to begin construction.

## Licence Issuance

Upon a successful facility inspection, the applicant may begin cannabis operations. The licensee may not yet sell cannabis products into the recreational market.

## Band Membership Check

All ownership of the applicant entity must be by Six Nations band members. Membership and CP will be verified with Six Nations Lands/Membership.

## Public Notice Period

Applications will undergo a 15-day public notice period. The applicant will be given an opportunity to respond to feedback.

## Phase II Consultation

Upon successful review of applicant band membership, public notice submissions and site-suitability, the applicant will attend meeting and submit Phase II application documents.

## Phase II Document Review

The applicant must submit facility specifications, including physical security and production standards for review.

## Requests for Information

Additional information may be requested from the applicant as required to ensure all information is provided and all standards are met.

## Facility Inspection

Interim and final inspections of the proposed facility will be conducted to ensure that building materials and security devices are sufficient to ensure safety and quality of the cannabis.

## Licence Amendment

To produce cannabis products for sale into the recreational market, a licensee must first have batches of those products evaluated and be granted a sales amendment.

## Phase I Application Documents

Business Overview Form
Status cards for all owners of the applicant entity
Six Nations Lands/Membership band membership verification consent (all owners)
Certificate of possession (CP) for proposed licensed site
Land-owner consent form
Six Nations Lands/Membership certificate of possession verification consent
Constituting documents for applicant
All existing third-party agreements with the applicant entity
Corporate schematic diagram displaying entities affiliated with applicant
Concept plan (see Proposal Overview Form, Appendix A)

## Phase II Application Documents

Facility Standards Compliance Form
Phase II application processing fees
List of standard operating procedures
List of record-keeping practices
Security clearance application forms
Site survey of subject property
Environmental risk mitigation strategy (if applicable)
Lease/land use agreement (if applicable)
Corporate responsibility plan (if applicable)
Six Nations consultation and engagement plan (if applicable)
Broader public consultation and engagement plan (if applicable)
Updated third-party agreements with the applicant (if applicable)
Qualified assurance person report (if applicable)