

C&K Rentals Ltd
“CK Pharmaceuticals”

Establish Hydroponic Production Facility for
Medical Marijuana

ENVIRONMENTAL REGISTRATION DOCUMENT

May 26, 2018

Government of Newfoundland and Labrador
Environment and Conservation
Pollution Prevention Division
4th Floor, Confederation Bld., West
St. John's, NL
A1B 4J6

May 26, 2018

RE: C&K Rentals Ltd. "CK Pharmaceuticals" – Marijuana Production Facility

Please accept the following document as an outline of our plan to renovate and retrofit our 13122 sq foot building for the purpose of a marijuana production facility in Clarenville, NL.

We have been developing our proposal with Health Canada since June 2017. To ensure that we have the most comprehensive proposal and business plan possible, we consulted with industry specific leaders, obtained advice from various departments within both levels of government (Federal and Provincial), and identified and worked with our well educated and experienced Quality Assurance Manager in developing a solid production plan. We are well versed in the many regulations we must adhere to for a project of this nature, and we are committed to the safety of our community and environment as well as our product. In March of this year, we obtained our file number from Health Canada and we are ready to begin the next phase in our development.

When all renovations are complete, we will have a physically and environmentally secure facility that is fully compliant with all federal, provincial, and municipal regulations. In fact, due to the very nature of many of the regulations and their intensity, we do not see any environmental issues associated with our facility at all. As an example, there will be no external smell associated with "fumes" from our product at certain growth stages due to the regulations to have industrial filters and air scrubbers installed throughout our ventilation systems. Any chemicals we would use are restricted to plant nutrients and materials and regular cleaning supplies.

We have the support of our local municipality, the Town of Clarenville, and they have categorized us as "Light Industrial". It should be noted that just a few feet from our facility there is a busy dockyard facility and most importantly a former fish plant that operated for many years – most recently as a shrimp processing facility. We feel that this demonstrates that the location of our proposed facility is in an appropriate zone.

We look forward to your reply. I can be reached at 709-427-2627 for further information.

Sincerely;

Christopher R. Duffitt, Owner/Operator

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1.0 NAME OF THE UNDERTAKING

C&K Rentals Ltd. Cannabis Production Facility

2.0 PROPONENT

2.1 Name of Corporate Body

C&K Rentals Ltd.

2.2 Address

72 Marine Drive
Clarenville, NL
A5A 1L3

2.3 Chief Executive Officer

Name: Mr. Christopher R. Duffitt

Official Title: Owner/President

Address: 111 Marine Drive
Clarenville, NL
A5A 1M6

Telephone: 709-466-7471 (Office) 709-427-2627 (Cell)

2.4 Principal contact person for purposes of environmental assessment

Name: Christopher R. Duffitt

Official Title: Owner/President

Address: 111 Marine Drive
Clarenville NL
A5A 1M6

Telephone: 709-466-7471 (Office) 709-427-2627 (Cell)

3.0 THE UNDERTAKING

3.1 Name of the Undertaking

C&K Rentals Ltd. Cannabis Production Facility

3.2 Purpose/Rationale/Need for the Undertaking

The purpose of this undertaking is to establish a licensed cannabis production facility in Clarenville, NL. Our company proposes to produce and sell cannabis products locally, provincially and nationally to registered clients, and other licensed producers/sellers. We have an application registered with Health Canada to become a licensed producer of medical cannabis, however we feel this facility is also needed to supply the anticipated demand for licensed cannabis in the event that cannabis becomes legalized in Canada this year. We propose to renovate and retrofit our existing building at 72 Marine Drive, to ensure compliance with each regulation of the ACMPR (Access to Marijuana for Medical Purposes Regulations) as they apply to a marijuana production facility. When we are fully licensed to produce, we will endeavor to supply the licensed cannabis retailers as recently selected pending legalization by the Newfoundland and Labrador Liquor Corporation.

In researching our project, we also considered a location at Come By Chance NL. We had demonstrated an interest in obtaining the building formerly intended as a paper mill facility more recently used as a storage facility in that locality. As that building is now considered a crown land asset, we contacted the Department of Transportation and Works to discuss an offer, however we were advised that a sale was already pending. Given the time frame and potential costs it would have taken to secure the building in the event that the pending sale did not occur, we instead focused on our own facility.

Our location is much newer than the building at Come By Chance, and is centrally located in the hub of the east coast with close proximity to the Bonavista, Burin and Avalon Peninsulas. Also, with the closure of the Barry Group Shrimp Plant, the uncertain future of Burry's Shipyard and other economic downturns in the area, we felt that this location would provide long term employment opportunities for the people of our local area. As this company owns the building and land at 72 Marine Drive, we are already at an advantage in that there is no need to secure funding to purchase or build elsewhere. Although the building is not as large as other planned facilities around the Province in terms of square footage, it currently consists of large open spaces on each of its 3 floors, allowing us to take advantage of vast unobstructed grow floors. This allows us to maximize yield and allows for proper workflow.

4.0 DESCRIPTION OF UNDERTAKING:

4.1 Geographical Location

The C&K Rentals Ltd. Cannabis Production Facility will be located at Civic No. 72 Marine Drive, in Clarenville, NL (48° 10' 5.89" North/53° 57' 41.1444 West). The property is 0.1580 hectares in size and the building houses approximately 13,200 square feet of floor space over three floors. Access to the site is via Marine Drive, which is in an older part of town at the waterfront, traditionally a production/manufacturing area. The Town of Clarenville zones us as Discretionary Use/Commercial/Light Industrial. We are a few meters away from Burry's Shipyard and the former site of Barry Group Shrimp

Plant. A survey of the property as completed by Control Surveys Clarenville is attached. Our surrounding properties are described as follows:

North: The site is bounded to the north by Alda Electric Ltd.

East: The site is bounded to the east by our parking lot and coastline

South: The Site is bounded to the south by one residential property (Dan Allen)

West: The site is bounded to the west by woodland, NL Power pole easement, and farther west the Newfoundland Snowmobile Association trail way.

4.2 Physical Features

4.2.1 Proposed Undertaking

Our facility is located approximately 1 hour and 50 minutes east of St. John's, at 72 Marine Drive, Clarenville. This 3-story building is currently owned outright by the business owner, is fully serviced and zoned as light industrial. The project plan is to renovate and retro-fit the building into a 13122 sq foot marijuana production facility that adheres to each regulation of the ACMPR (Access to Cannabis for Medical Purposes Regulations). When complete the facility will house the cultivation of cannabis plants and the production of associated retail products. Much of our building is open floor space already, which we feel is ideal for needed growing areas. The building is concrete foundation, wood and gyproc interiors with metal siding exterior and metal roof. As per our attached floor plans as designed by Control Surveys Clarenville, the building will include 4 grow floors. 3 clone rooms, a secure storage room, 2 drying rooms, one packaging room, a dispensary, a retail space as well as washrooms, regular storage/utility and administrative rooms. The site also contains a parking area for staff and visitors (pre-existing) and will be enclosed within a perimeter fence. The facility will be secure in compliance with the ACMPR with access controlled and monitored 24 hours seven days a week. We are connected to the Town of Clarenville municipal water and sewer infrastructure.

4.2.2 Existing Biophysical Setting

The site is previously developed with no land clearing required. There are no wetlands or rivers located within or near the property limits however as discussed under our geographical location we are bounded at the east by the coastline of Smith Sound, Trinity Bay. Directly in front of our building is Marine Drive with a parking lot beyond, then the coastline. There are no ponds near our site and nearest river The lower Shoal Harbour River discharge is 1.9 kilometers away to the south. There is limited habitat for wildlife onsite with the exception of some bird species (seagulls). While our site is level, the area surrounding slopes upward from East to West. There is no need to level our surrounding land.

The surrounding properties are primarily commercial, industrial and manufacturing type enterprises such as Alda Electric, Burry's Shipyard, the Provincial Courthouse and until recently Barry Group Shrimp Plant. There is however one residential property bordering out site to the south as discussed above. All operations will be conducted inside the facility in a controlled, sealed environment with no activities with cannabis carried out in the outside environment.

4.3 Construction

4.3.1 Renovations

All renovations for this project will be 100% funded by C&K Rentals Ltd., with no outside investors or funding. Estimated time frame from start to completion is estimated at 4 to 6 months. Renovations will commence August 2018.

Control Surveys Ltd., Clarenville have created the floor plans and design, with input and consultation from local security professionals. In keeping with our core values and intention to become a respected and trusted community business, we will only utilize local professional services, material supplies and labour. Following our designed floor plans, contractors and skilled trades people will be consulted to oversee all renovations, and ensure that all is completed in adherence to Provincial and Municipal code. Skilled carpenters, electricians, plumbers and Heating/Venting/and Cooling specialists will be utilized. In addition, a local security company will be contracted to properly install all required security features of the facility, including but not limited to the alarm system, multiple security cameras and requirements for secure storage area. We do not foresee any resource conflicts.

As depicted in the attached plans, the facility will be comprised of three production levels with a total growing space of 10,000 sq. ft.

The first floor will house an approx. 3000 sq foot grow floor, secure storage vault, the security and administrative offices, drying room, cloning room, washroom facilities, retail space, dispensary, and utility rooms.

The second floor houses two grow floors, (approx. 1000 sq ft and approx 3000 sq feet respectively) cloning room, mother room, drying room and packaging room.

The third floor makes use of the previously undeveloped attic space to house another 2300 sq foot grow floor.

The floor plans are detailed with indicators as to the positions of all video cameras, security doors, and alarm sensors. We have included our full security plan with this document for further detail surrounding the intensive security regulations we will follow.

A proper lighting system that replicates an ideal growing environment is essential to product quality and yield. We will utilize a system of LED and High Pressure Sodium lighting.

All product will be tracked and record truly from “Seed to Sale” using industry specific software. We have entered into an agreement with Ample Organics to provide plant tracking, bulk management, packaging, labeling and more.

While the majority of our internal layout is already open space conducive to grow floors, there will need to be some partitions, walls and other built in fixtures installed to define the rooms as depicted on our attached floor plans. Carpeting will need to be removed and replaced with commercial grade flooring and on the second floor windows will be removed. This type of renovation will require skilled carpenters, painters, plasterers and other general labour.

As our building is already connected to the municipal infrastructure any plumbing installation required for renovations will be completed internally. The existing washroom facilities will be maintained. All other plumbing requirements such as the installation of fresh water piping where needed will be completed by utilizing the existing internal fixtures where possible.

A sophisticated heating venting and cooling system will be installed that will create a climate controlled internal environment optimal for plant growth while ensuring that no fumes, odors or pollens escape through our external exhausts. Due to high temperatures generated from the lighting required at specific stages of product growth, a high efficiency air-conditioning system will be installed to keep temperatures down to a 70 to 75 degree Fahrenheit range. While plants thrive at a 50% to 60% humidity our watering system could increase site humidity to 75%. There for an HVAC system will ensure that humidity levels are kept at the acceptable levels. Special vents and ducts will be installed to create a natural airflow. Exhaust systems will be installed with special commercial air filters and scrubbers that prevent odors, fumes and pollens from escaping into the outside environment.

Our hydroponics system will be installed in each grow room as depicted in the attached site plans. We plan to use a system of PVC piping, electric water pumps and a hose/tubing system that allows for the constant capture and re-circulation of aerated water.

As there will be no operations carried out outside the facility and because we already have a parking lot on site, there will be no need for any outside construction or landscaping.

The chart below depicts the job classifications of those we will seek to employ to carry out renovations:

Table 1: Renovation Occupations

Occupation	NOC Code	Full/Part time	Length of employment	# of Personnel	Contract/Direct Hire
HVAC Mechanic	7313	Part	4 to 6 months	1	Contract
Electrician	7241	Part	4 to 6 months	2	Contract
Carpenter	7271	Full	4 to 6 months	3	Contract
Plumber	7251	Part	4 to 6 months	2	Contract
Laborer	7611	Full	4 to 6 months	6	Direct Hire

4.3.2 Sources of Pollution

Potential sources of pollution which may occur during the renovation phase include:

Solid Waste:

Solid waste generated during the renovation phase such as discarded scrap lumber, carpeting scraps etc could potentially affect the esthetics of the area if these materials inadvertently misplaced outside of our facility while awaiting pickup for proper disposal. If this was to be the case, this refuse could also pose a hazard for wildlife (bird species) in the area as well as cause potential injury to members of the general public. Good housekeeping practices during renovations should effectively eliminate these risks. All scrap materials will be kept inside the facility until such time as they can be safely disposed of.

Noise and Dust:

As this is not a full construction project rather a renovation, there will be no need to utilize any heavy equipment, therefore there will be minimal to no noise or emissions. As all activities related to the renovation take place indoors, the noise (from hammers, saws, small drills and regular tools) will be minimal and difficult to hear from the street. We will ensure compliance to the Town of Clarendville noise by-laws. There will be some dust particles generated internally, however good housekeeping practices will keep these particles from entering the external environment.

Liquid Effluent:

There will be no liquid effluent considerations for this renovation phase of our project.

Handling of Petroleum Oils and Lubricants:

These substances will not be used for the purposes of renovations, however there is a potential risk of a leak or spill from a supply delivery truck. In the event of such circumstance the site will be equipped with spill response materials.

4.4 Operation

We are confident that when renovations are complete and when our facility passes the required inspections by Health Canada, we would be granted our license to commence producing by mid 2019. Initially, only a license to produce would be granted. After the production of one batch of product, we would need to submit samples to Health Canada for testing. If samples meet the strict requirements set forth by Health Canada, then we would be granted a license to produce and sell.

Operations would be an ongoing concern for the foreseeable future. There are no foreseen resource conflicts.

4.4.1 Cannabis Production

Start up Seeds or Plants will be obtained from an approved Health Canada Licensed facility such as Aurora Cannabis Enterprises Inc., Alberta or Tweed Farms Ontario. As there is no licensed producer in the province yet, we will need to purchase supplies out of province. However, there are several other enterprises within the province that also have applications in the Health Canada system. When they are approved, we would certainly look to purchase supplies from within the province.

Cannabis plant growth will be limited to the predefined grow rooms. Each room will be secure in that access will be strictly limited to employees required to be present for work related activities. Each grow room/floor will have independent environmental controls that regulate lighting, temperature and humidity through the HVAC system. We will utilize a soil-less, hydroponic system that uses a synthetic rock type-growing medium. At peak production we estimate to utilize approx. 1500 gallons of water per day. We will use the town water supply, but will also use a re-circulating/recapture system.

Nutrients will be supplied in a solution distributed through the capture/recycle watering system.

The production process is summarized as follows:

- Clone plants are generated from cuttings taken from a mother plant and placed in the clone room to vegetate
- When clones have matured they are transferred to the grow floor to begin the flowering stage
- When cannabis flower is achieved and the plant has matured the plants are harvested
- The flower is trimmed and air dried

- The dried flower is measured carefully and packaged in accordance with the ACMPR
- Medical and recreational cannabis orders are filled in compliance with Health Canada and the Provincial Government Regulations.

4.4.2 Sources of Pollution

Potential sources of pollution that may occur during operations include:

Pesticides/Chemical Storage

No pesticides will be used unless brought in for a specific problem.

Health Canada has very strict guidelines as to which pesticides can be used. In fact there are only 21 registered pesticides approved for use on Cannabis. A listing of the approved pesticides is attached. No pesticides will be stored on-site as they would only be brought in when required.

Regular food safe cleaning agents will be kept on site in safe storage, away from the secure storage area designated for cannabis products only.

Air Emissions/Odor/Pollen

As with any operation involving manufacturing or production there is the potential for odors and possibly pollen escaping through our exhaust systems. To maintain optimum growing conditions for plants and to ensure healthy air quality for employees, a large amount of air will flow in and out of the areas where cannabis is cultivated and processed. As per the ACMPR, our exhaust systems will be equipped with industrial air scrubbers and carbon or HEPA filters. Mist Cannons will be utilized inside the facility to further keep odors at bay. Therefore emissions issues will be minimal if at all. We will contract with HVAC specialists to ensure our systems are installed effectively. Before a license to produce is issued from Health Canada, we will be subject to inspection and evaluation of our entire site with special attention given to our HVAC systems. If anything that we have installed is not deemed effective by Health Canada, we will be given clear direction as to how to correct the issue and will follow the department's direction. Once operational, all emissions will be monitored to be compliant with the ACMPR and Provincial Regulations. Inside odor and air quality will be constantly monitored to ensure safe clean air.

It should be noted that a large shrimp processing plant operated for many years just meters away from our site. It is unlikely that our operations would produce any more noxious emissions/odors than a facility such as that.

Solid Waste

There will be a moderate amount of non-cannabis commercial related solid waste generated from operations, including but not limited to packaging materials, paper products, food waste from employees etc. Historically C&K Rentals Ltd has always

practiced a recycling culture and will continue this for these operations for any recyclable materials.

Cannabis related waste from plant roots, spoilage etc. have to be destroyed by a method approved and mandated by Health Canada. These waste materials will be de-natured and rendered harmless before off site disposal.

Noise

Day to day operations will be completed inside the facility, no work activities outside, with the exception of shipping and receiving. As we have made it policy that all orders must be received or shipped between 10:00 am and 4:00 pm daily only, there will be no noise generated nighttime.

When choosing our HVAC systems we will pay attention to possible noise levels generated and ensure a system that runs as quietly as possible while still being effective.

We will adhere to the Town of Clarendville by-laws regarding noise.

Liquid Waste

Discharge from the site will be regular sewer, floor and storm water drains. Nutrient laden water run off as a result of the plant flushing cycle will be re-circulated. We will adhere to the Environmental Control Water and Sewage Regulations, 2003.

Cannabis waste will be destroyed and disposed of in accordance with the ACMPR.

Handling of Petroleum Oils and Lubricants:

As these products are not used in the production of cannabis directly, the only potential risk of a leak or spill of these products would be from a supply delivery truck. In the event of such circumstance the site will be equipped with spill response materials.

4.4.3 Resource Conflicts

As discussed there are various methods we will incorporate into our planning and business operations that will substantially reduce the risk of negative environmental impact.

Table 2: Potential Resource Conflicts - Operation

Item	Potential Impacts	Preventative Measures
Pesticides/Chemical Storage	Pesticide chemical spills could inadvertently contaminate local environment and cause public health and safety concerns	<ul style="list-style-type: none"> • Only Health Canada approved pesticides brought to site when needed • Employee training program • Standard Operating

		<p>Procedures outline safe handling of Pesticides and cleaning products and spill cleanup/response methods</p> <ul style="list-style-type: none"> • Separate storage room for pesticides and cleaners away from cannabis product
Air Emissions/Odor	Odors/pollen may escape into the local environment through HVAC air exhaust	<ul style="list-style-type: none"> • All operations carried out internally only • Mist cannons utilized • HVAC system equipped with Carbon Filters and Scrubbers
Solid Waste	<p>Waste materials may inadvertently end up outside facility impacting local bird species, and environment.</p> <p>Could impact the esthetics of local area</p>	<ul style="list-style-type: none"> • All waste to be collected and disposed of regularly • Practise good housekeeping • Continue C&K Rentals Ltd. Recycling program
Noise	Noise from Shipping/Receiving as well as potential noise from HVAC system	<ul style="list-style-type: none"> • Will adhere to Town of Clarendville By Laws • HVAC system selected for quiet operation as well as effectiveness. Regularly maintained • No shipping receiving activities outside 10:00 am to 4:00 pm daily
Handling of POLs	Accidental spillage from delivery vehicles	<ul style="list-style-type: none"> • Spill kit provided. Reputable delivery companies utilized

4.5 Occupations for Operations

When operational, we will employ administrative personnel, production managers and laborers, a Quality Assurance Manager and assistant, sales and marketing team, security personnel and more. The majority of these positions are full time permanent. At peak, we will provide employment to approximately 100 people, year round, seven days a week. Recruitment will be from the local human resource base. Recruiting will be carried out in adherence to employment equity guidelines and we will operate within the current Labour Standards.

We will solicit the involvement of the local College of the North Atlantic campus to identify potential employees from recent graduates. Also as a means to reach out to displaced fish-plant laborers and the general public, we will hold several job fairs locally. We are also investigating the possibility of partnering with the department of advanced education and skills to identify potential employees who are unemployed or under-employed and seeking better opportunities. We are also open to working with other employment type agencies such as the Ability Employment Corporation.

Table 3: Employment Breakdown: Operations

Occupation	NOC Code	Full/Part time	Length of employment	# of Personnel	Contract/Direct Hire
Business Manager	1221	Full	Permanent	1	Direct Hire
QA Manager/Assistant	2211	Full	Permanent	2	Direct Hire
Head of Security	6316	Full	Permanent	1	Direct Hire
Security Guard	6541	Full	Permanent	2	Direct Hire
Production Manager	0016	Full	Permanent	3	Direct Hire
Master Grower	0822	Full	Permanent	3	Direct Hire
Trimmers/Harvesters/	8432	Full	Permanent	50	Direct Hire
Shipping/Receiving	1521	Full	Permanent	6	Direct Hire
General Laborer	9619	Full	Permanent	30	Direct Hire
Sales Clerks	6211	Full	Permanent	4	Direct Hire
Marketing Manager	0124	Full	Permanent	1	Direct Hire

4.6 Project Related Documents

Existing project related documents;

- *Application to Become a Licensed Producer under the Access to Cannabis for Medical Purposes Regulations (ACMPR): Health Canada. Final Draft Submitted February 23, 2018.* This application was developed by C&K Rentals Ltd. The process started in June 2017. A copy of the document is kept on file at 72 Marine Drive. We received our file Number from Health Canada in March of this Year.
- *Ample Organics Software Proposal – Prepared by Ample Organics, February 12, 2018.* This proposal and subsequent signed agreement outlines the features of this Industry Specific Seed to Sale tracking software as required by Health Canada under the ACMPR.
- *Quality Assurance Pre-Licensing Report – Prepared by Quality Assurance Manager, Wade Locke, Feb 2, 2018 –* This document is part of our application to Health Canada under the ACMPR. It describes in detail how our proposed operations will ensure compliance with the ACMPR, specifically sections 70, 72, and 75 and all its subsections.

5.0 APPROVAL OF THE UNDERTAKING

A substantial part of our application process with Health Canada under the ACMPR (*Access to Marijuana for Medical Purposes Regulations*) involved a complete Security Clearance from the RCMP and Health Canada. While we have been working with government on our application for the last 12 months, we just received our file number on March 7, 2018. The security screening process commenced on March 23, 2018 and will take several months to complete.

When the security clearance is complete, the facility is ready and passed inspections, then we may be granted the first of 2 licenses from Health Canada. The first license is to *produce* only. We would be required to submit our first batch of product to Health Canada for testing and approvals. If our product then passes several stringent tests and meets regulations, then we would be issued a license to *produce* and *sell*.

In addition to the approvals from Health Canada we also needed the approval from the Town of Clarenville as well as other permits such as building/renovation permits etc. We are pleased to say we now have a letter of approval from the Town of Clarenville. We participated and contributed to an external study with the Town of Clarenville in an effort to ensure community and municipal acceptance of our initiative. Plan-Tech Environment Ltd., Mount Pearl, completed this study. A public notice was posted, and there were no objections from the community.

Within this process, we also had to submit written notice of our intent to the local detachment of the RCMP and our Local Fire Department. We also attended meetings with and gained help and advice from our local MHA. Feedback has been quite positive. A common theme from all discussions is that the benefits in terms of employment and economic opportunities created by our project will be substantial for our area.

The following is a list of permits, licenses, approvals and authorizations that may be required to enable the undertaking:

Table 4: Summary of Required Approvals

Authorization	Legislation	Responsible Department
Project Registration	NL Environmental Protection Act – Environmental Assessment Regulations	NL Department of Municipal Affairs and Environment
Security Clearance	ACMPR (Access to Cannabis for Medical Purposes Regulations)	Health Canada RCMP
License to Produce	ACMPR (Access to Cannabis for Medical Purposes Regulations)	Health Canada

License to Sell	ACMPR (Access to Cannabis for Medical Purposes Regulations)	Health Canada
Municipal Approval	Town of Clarendville Development Regulations and Specifications	Town of Clarendville
Various Permits	Renovation/Construction	Town of Clarendville

6.0 SCHEDULE

The renovations portion of the project is proposed to start late August/Early June 2018, pending receipt of necessary permits and approvals. As we currently house a banquet room on the second floor of the facility, we have commitments to host events that were booked year’s prior. The last booking takes place August 25 2018.

We estimate the full renovations to take about 4 to 6 months, after that time Health Canada would complete the first of a series of site inspections. We expect that our License to Produce would be granted no earlier than February 2019. We will begin recruiting employees in November 2018. Applicants will be screened and offered employment pending Health Canada approval. Production will commence once license is granted.

6.0 FUNDING

This project will not require any government loans or grants and will be 100% funded by C&K Rentals Ltd. Project costs are estimated at \$600000.00.

Date

Signature, Christopher R. Duffitt

Appendix: Documents Attached

Attachment A:

**C & K RENTALS LTD.
Clareville, NL**

SCHEDULE "A"

ALL THAT piece or parcel of land situate and being in the **Town of CLARENVILLE** in the Electoral District of Terra Nova abutted and bounded as follows:

THAT IS TO SAY: Beginning at a point on the western limit of **MARINE DRIVE** (20 metres wide), the said point having coordinates N 5 337 043.97 metres and E 233 293.63 metres of the Three Degree Modified Transverse Mercator Projection (NAD-83) for the Province of Newfoundland and Labrador;

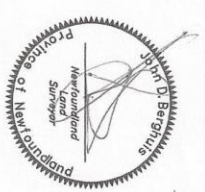
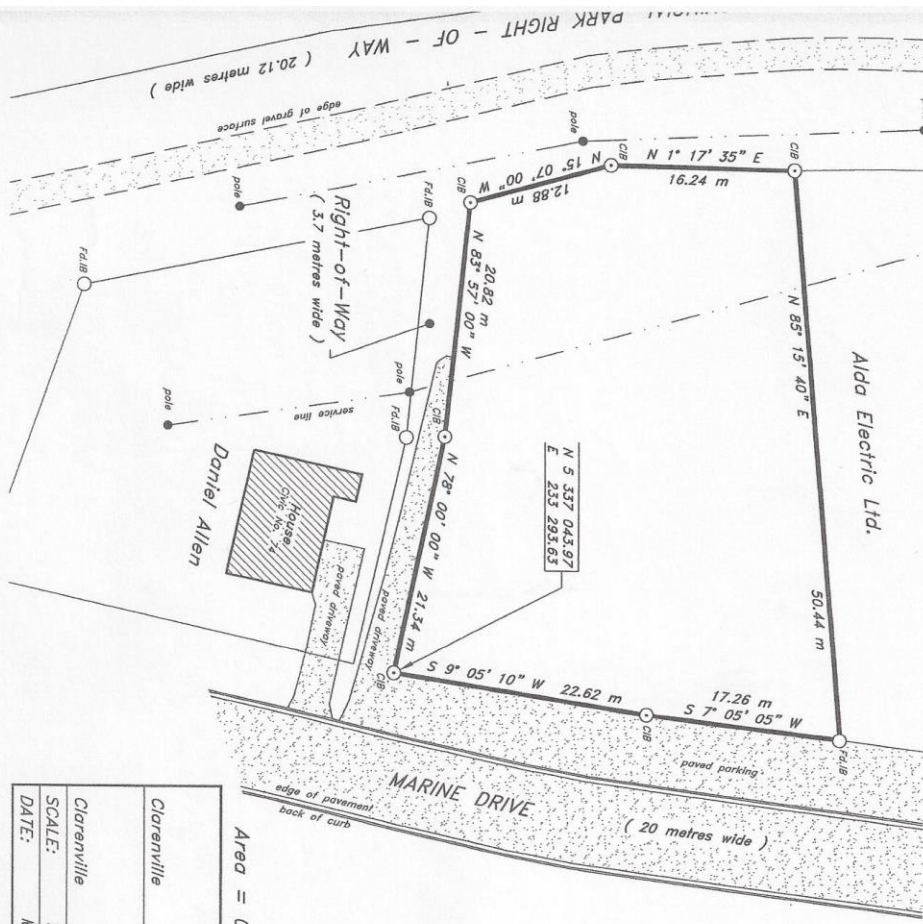
THENCE along the northern limit of a Right - of - Way (3.7 metres wide) north seventy-eight degrees zero zero minutes zero zero seconds west (N 78-00-00 W) twenty-one decimal three four (21.34) metres, north eighty-three degrees fifty-seven minutes zero zero seconds west (N 83-57-00 W) twenty decimal eight two (20.82) metres;

THENCE along the eastern limit of **T'RAILWAYS PROVINCIAL PARK RIGHT - OF - WAY** (20.12 metres wide) north fifteen degrees zero seven minutes zero zero seconds west (N 15-07-00 W) twelve decimal eight eight (12.88) metres, north one degree seventeen minutes thirty-five seconds east (N 1-17-35 E) sixteen decimal two four (16.24) metres;

THENCE by property of Aida Electric north eighty-five degrees fifteen minutes forty seconds east (N 85-15-40 E) fifty decimal four four (50.44) metres;

THENCE along the said western limit of **MARINE DRIVE** south seven degrees zero five minutes zero five seconds west (S 7-05-05 W) seventeen decimal two six (17.26) metres, south nine degrees zero five minutes ten seconds west (S 9-05-10 W) twenty-two decimal six two (22.62) metres, more or less to the point of beginning and containing an area of 0.1580hectares.

All bearings refer to the above mentioned Projection.



NOTE:
 ○ CIB CAPSIC IRON BAR
 ○ IB IRON BAR
 Fd. FOUND
 - NO SCALE FACTOR USED
 ALL DISTANCES ARE GRID DISTANCES

NOTE:
 Starting point derived from Real Time Kinematic GPS observations relative to Control Monument No. 78G2014

CONTROL MONUMENTS

(MAD-85)
 78G2014 N 5 336 150.323
 E 233 233.110
 78G2015 N 5 336 710.844
 E 233 459.656

Area = 0.1580 hectares

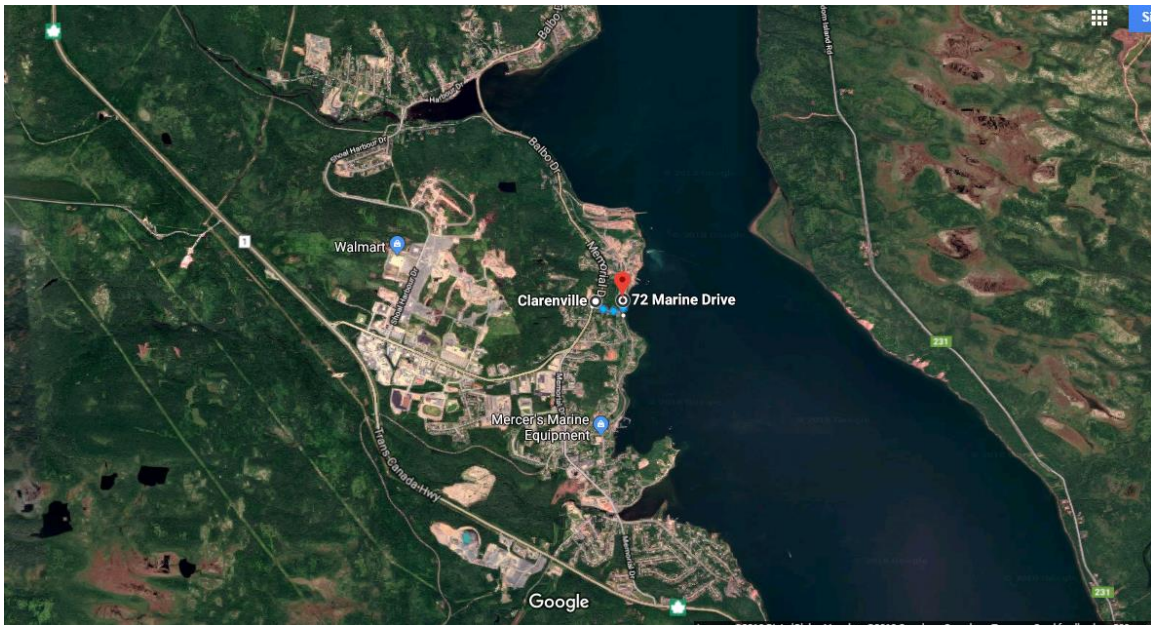
(((CONTROL SURVEYS LTD. NEWFOUNDLAND LAND SURVEYORS 3 MYERS AVENUE, 45A TR - 7th (709) 466-5886 Clarenville Newfoundland	
SURVEY ON BEHALF OF C & K RENTALS LTD. Clarenville Newfoundland	
SCALE:	1 : 400
DATE:	May 1, 2017
JOB No.:	2017-160
SURVEY BY:	J.D.B.

Attachment B:

1. Newfoundland And Labrador

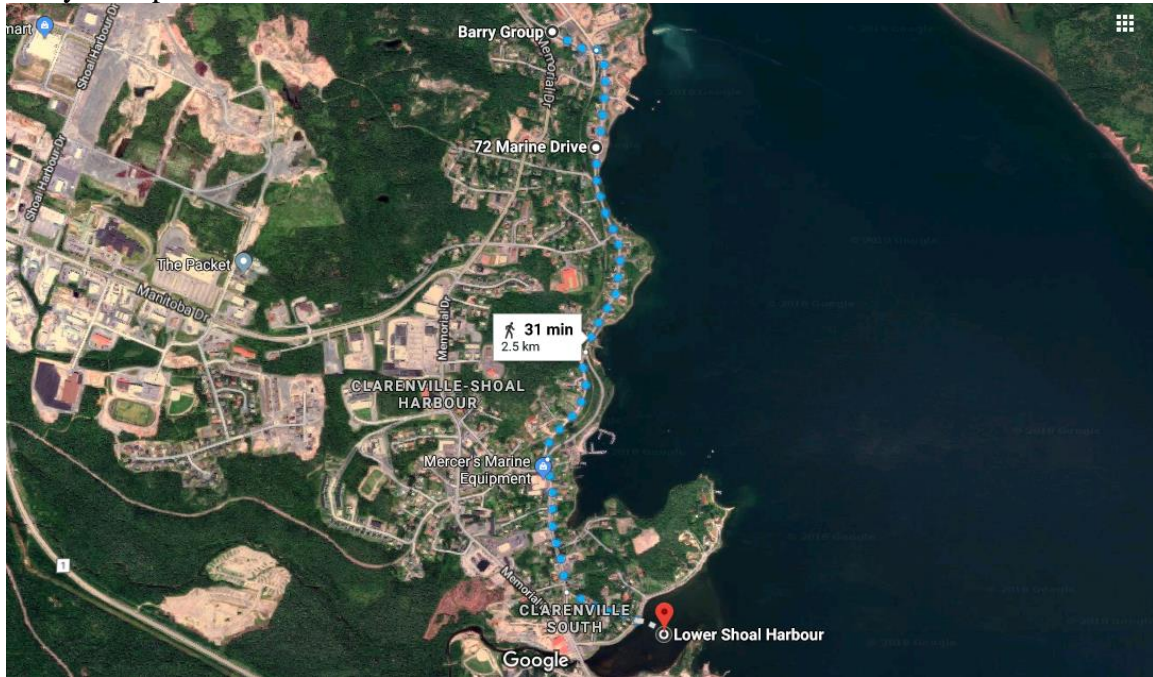


2. Clarenville/Shoal Harbour Area

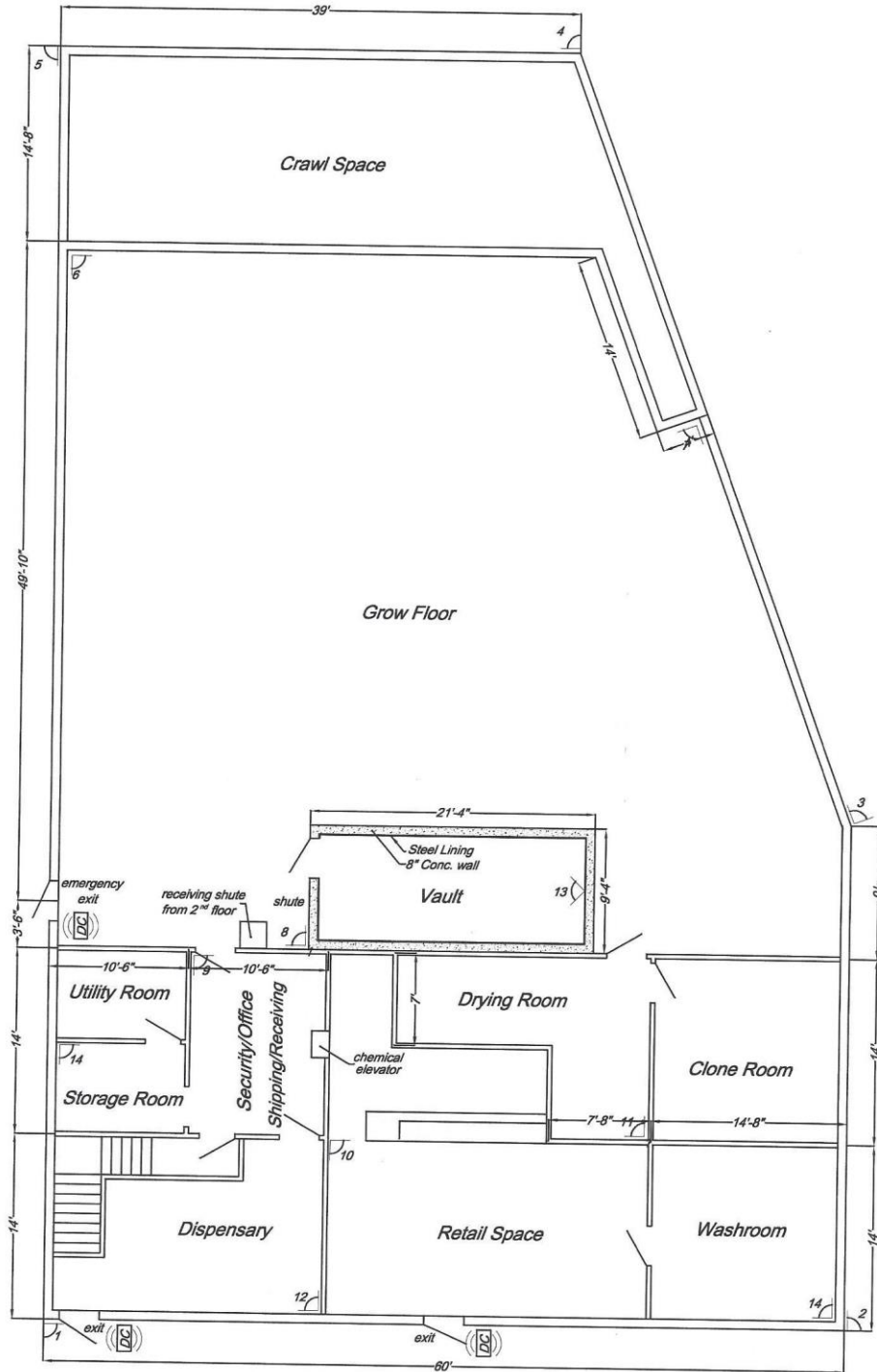


Attachment C:

Barry Group Plant to Lower Shoal Harbour River



Attachment D:

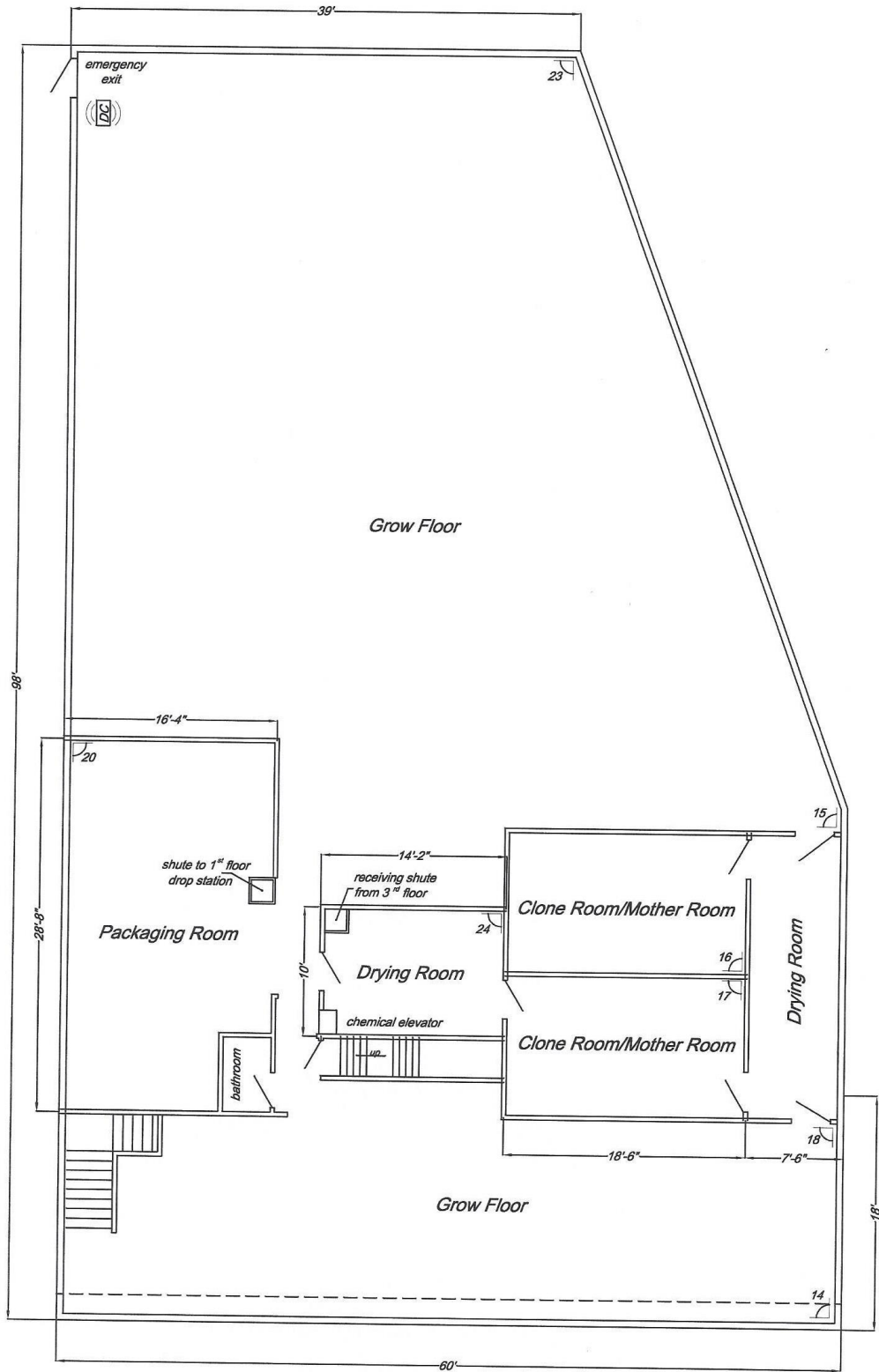


 Security Door Contact Alarm

 Security Camera

FIRST FLOOR

DO NOT SCALE DRAWING

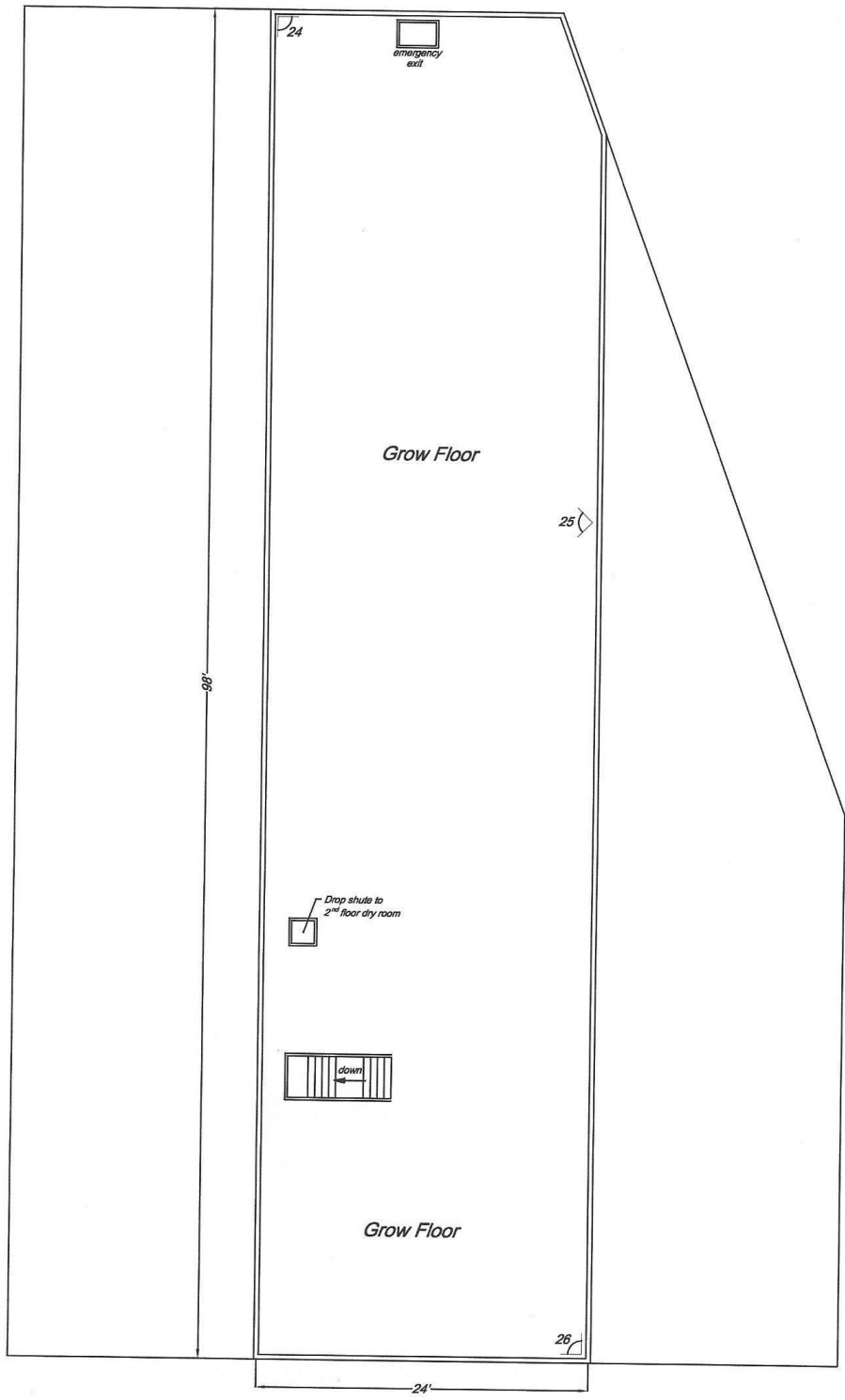


SECOND FLOOR

DO NOT SCALE DRAWING

 Security Door Contact Alarm

 Security Camera



-  Security Door Contact Alarm
-  Security Camera

THIRD FLOOR
DO NOT SCALE DRAWING

Attachment E:

Security Measures.

Due to the nature of materials to be present and the activities involved, we understand and accept that there is a great responsibility on us to ensure that the highest level of security is maintained at all times. We acknowledge that all accountability rests with us, and that we are bound to operate in a manner that is in the best interest of our clients, employees and our community, with safety and security of the utmost importance. To that end we intend to meet, and in some instances exceed, the regulations set out in the Access to Cannabis for Medical Purposes Regulations.

Perimeter of Site:

A gated fence barrier will be erected that encompasses the entire perimeter of the site, allowing a 6 foot “buffer” area between the fencing and building walls. The only break in the fencing will be in the area directly adjacent to the entrance to the point of purchase area to allow consumers to enter the building, but yet only have access to the point of purchase area. This entrance will be locked at all times. Registered consumers will be responsible for making an appointment to place an order or pick up product, as there will be no walk in service permitted. Consumers must ring an outside buzzer to signify to staff inside to grant them access. A security camera connected to our 24-hour video recording system will be positioned capturing all activities at this particular entrance.

24 hour visual recording systems with remote access function will be installed at intervals around the entire perimeter of the site. These intervals will be established in a manner as to overlap recorded areas to prevent any “gaps” in surveillance coverage. Cameras will be placed at such an altitude as to impede any tampering. On site Security personnel will monitor live feed from these camera systems, from the security desk, as well as perform physical perimeter inspections at set intervals throughout shift. The purpose of the remote monitoring function is so that the senior person in charge can observe any activities from off site as an additional security measure. This is set up using the Internet with a specific username and password that only the Senior Person in Charge will have. Cameras can then be accessed from any Internet enabled device such as a laptop or mobile device.

Recording systems are equipped to record and store data for a set period of time and also have a time stamp search function that enables the viewer to quickly play back specific footage. Back up of footage is accomplished through integrated system software that allows transferring of data to external jump drives. Data stored can be played back on any computer or Monitor that has USB ports. Back ups will be completed on a Weekly basis, each file saved clearly labeled by date, time and year. For example, January 1 to January 7, 2017 and so on. Jump drives will be kept on site in locked safe for which only security personnel and Senior person in charge will have the combination. In the case of any incident of attempted or actual unauthorized activity, data will be turned over immediately to local authorities.

In addition to visual recorded data and physical perimeter inspection, the area will also be protected by a motion detection alarm system that will trigger an audible alarm that can be heard from some distance away, with an immediate signal sent to “Central Station”, the 24 hour offsite security alarm monitoring department, and the local authorities. Central Station will also call the Senior Person In Charge any time the alarm system is tripped. In fact, if any time the alarm system is “Set” or “Turned off” by an employee even with a code, or tampered with in anyway, a message will be sent immediately to the owner (Senior Person in Charge). On site personnel will respond immediately and appropriately to any alarm system trigger and call proper authorities immediately.

In the case of attempted or actual unauthorized activity of ANY sort, on site personnel will immediately record all information pertaining to the event. Information will be entered in a logbook and will include:

- Date/Time of incident
- Names of Individuals involved where known
- Description of occurrence
- Staff members on duty at time of incident
- Measures taken in response of the incident
- Date and time at which measures were taken and by whom

A sample of an actual logbook entry is included with this application. Logbooks will be kept on site at security station and provided to any authorities where warranted.

Motion sensors installed in the ceilings, walls, doorways, stairwells etc. provide complete coverage over every square foot of the building both internally and externally.

It is also important to note, that there are absolutely no windows in any areas where cannabis will be produced, stored or worked with, eliminating any possibility of intrusion in that way.

Areas with site where Cannabis is present:

Cannabis will be present in different sub zones of the building as outlined below. We include with each sub zone, a detailed description of the security measures associated with each. To gain access to the main operations area which houses the sub-zones, namely the **Seed Germination Room, Grow Floor, Drying Room, Packaging Area and Vault**, all staff members including the Senior and Responsible Persons In Charge, must pass through a manned security barrier directly adjacent from the security desk. All staff members must present valid ID, and sign in with the security persons upon entering and leaving the area. Security persons are responsible for checking ID’s, noting employee name, date and time in logbook provided for this purpose. This area is subject to 24 hour recorded video surveillance, as well as a motion detector enabled alarm system that is monitored remotely by the alarm company. The motion sensors will detect any attempted or actual intrusion, and a signal will be immediately sent to Central Station, as well as the local authorities. The system also emits an audible alarm that can be heard from some distance.

No personal items such as food, beverages, coats, baggage, purses, cell phones or otherwise will be permitted beyond this point. Staff will be subject to random checks to ensure no items are being brought in or out. Staff members will sign agreements prior to accepting employment that outlines all rules and regulations, as well as authorizing consent to random security checks. Employees will be given copies of these agreements with the signed originals being held by management.

To prevent the escape of pollen, odors, and other particles, an industrial HEPA air filtration system will be installed in all areas where cannabis is present, and Carbon Filters will be installed as part of the exhaust system.

Seed Germination Area: Restricted to persons whose presence in those areas is required for work activities. This is a small area inside the building where cannabis seeds will be readied for growth. Only employees necessary to this aspect of production will be granted access. A locked door to which only the Senior/Responsible person in charge has the key serves as the physical barrier to this sub zone. The Responsible Person in Charge and/or the Senior Person In Charge will be physically present at all times when employees are required to be in this area. A permanent record will be kept of the identity of each employee entering/exiting this area. This will be accomplished by written record completed by the Senior/Responsible person in Charge. The record itself will contain the name of employee, date and time of access, and the employee's signature as well as the signature of the Senior/Responsible Person in Charge. No personal items such as food, beverages, coats, baggage, purses, cell phones or otherwise will be permitted in this area.

This area is subject to 24 hour recorded, monitored video surveillance, as well as a motion detector enabled alarm system that is monitored remotely by the alarm company. The motion sensors will detect any attempted or actual intrusion, and a signal will be immediately sent to Central Station, as well as the local authorities. The system also emits an audible alarm that can be heard from some distance. Also note, the owner immediately receives a message via mobile device that the intrusion detection system has been tripped.

In the event of In the event that any illicit and unauthorized behaviors occur as well as with any other incident requiring security response, detailed records will be kept of the incident, including a description of the incident, date and time of occurrence, response measures taken, and the date and time that measures were implemented. Proper authorities will be notified immediately, and all records (written and video recordings) will be provided.

Further note, to gain access to the area where this sub zone is located, all staff including the Senior/Responsible Person in Charge, must have passed through the manned security station as mentioned above.

Grow Floor: Restricted to persons whose presence in those areas is required for work activities. This is the large open floor area inside the building wherein all plants are

grown and tended for production. All other rooms are directly adjacent to this area. Only employees necessary to this aspect of production will be granted access. To gain access to the area, all staff including the Senior/Responsible Person in Charge, must pass through the manned security station as mentioned above.

A permanent record will be kept of the identity of each employee entering/exiting this area. This will be accomplished by written record completed by the Senior/Responsible person in Charge. The record itself will contain the name of employee, date and time of access, and the employee's signature as well as the signature of the Senior/Responsible Person in Charge. No personal items such as food, beverages, coats, baggage, purses, cell phones or otherwise will be permitted in this area.

The Responsible Person in Charge and/or the Senior Person In Charge will be physically present at all times when employees are required to be in this area. While employees are working Security person(s) will physically observe activities.

This area is subject to 24 hour recorded, monitored video surveillance, as well as a motion detector enabled alarm system that is monitored remotely by the alarm company when unoccupied. The system also emits an audible alarm that can be heard from some distance. Also note, the owner immediately receives a message via mobile device that the intrusion detection system has been tripped.

In the event that any illicit and unauthorized behaviors occur as well as with any other incident requiring security response, detailed records will be kept of the incident, including a description of the incident, date and time of occurrence, response measures taken, and the date and time that measures were implemented. Proper authorities will be notified immediately, and all records (written and video recordings) will be provided.

Drying Room/Packaging Area: This is a climate-controlled area, used to dry the product to make ready for packaging and sale, and is restricted to persons whose presence in those areas is required for work activities. A locked door to which only the Senior/Responsible person in charge has the key serves as the physical barrier to this sub zone. The Responsible Person in Charge and/or the Senior Person In Charge will be physically present at all times when employees are required to be in this area.

A permanent record will be kept of the identity of each employee entering/exiting this area. This will be accomplished by written record completed by the Senior/Responsible person in Charge. The record itself will contain the name of employee, date and time of access, and the employee's signature as well as the signature of the Senior/Responsible Person in Charge. No personal items such as food, beverages, coats, baggage, purses, cell phones or otherwise will be permitted in this area. The Responsible Person in Charge and/or the Senior Person In Charge will be physically present at all times when employees are required to be in this area.

This area is subject to 24 hour recorded, monitored video surveillance, as well as a motion detector enabled alarm system that is monitored remotely by the alarm company.

The motion sensors will detect any attempted or actual intrusion, and a signal will be immediately sent to Central Station, as well as the local authorities. The system also emits an audible alarm that can be heard from some distance. Also note, the owner immediately receives a message via mobile device that the intrusion detection system has been tripped.

In the event that any illicit and unauthorized behaviors occur as well as with any other incident requiring security response, detailed records will be kept of the incident, including a description of the incident, date and time of occurrence, response measures taken, and the date and time that measures were implemented. Proper authorities will be notified immediately, and all records (written and video recordings) will be provided.

Further note, to gain access to the area where this sub zone is located, all staff including the Senior/Responsible Person in Charge, must have passed through the manned security station as mentioned above.

Vault: This is a large walk in secure safe that is used to store product waiting for sale, seeds prior to germination, and spoilage/waste products waiting to be destroyed. It is centrally located within the building with no part of its perimeter against an outside perimeter wall. Only the Senior Person in Charge, the Responsible Person in Charge and the Quality Assurance Person will have access to this area. The Vault is locked at all times by a combination lock system that only the Senior Person in Charge has. Therefore, The Senior Person in Charge must be physically present when anyone is in the vault.

A permanent record will be kept of the identity of each employee entering/exiting this area. This will be accomplished by written record completed by the Senior/Responsible person in Charge. The record itself will contain the name of employee, date and time of access, purpose for access, and the employee's signature as well as the signature of the Senior/Responsible Person in Charge. No personal items such as food, beverages, coats, baggage, purses, cell phones or otherwise will be permitted in this area.

This area is subject to 24 hour recorded, monitored video surveillance, as well as a motion detector enabled alarm system that is monitored remotely by the alarm company. The motion sensors will detect any attempted or actual intrusion, and a signal will be immediately sent to Central Station, as well as the local authorities. The system also emits an audible alarm that can be heard from some distance. Also note, the owner immediately receives a message via mobile device that the intrusion detection system has been tripped.

In the event that any illicit and unauthorized behaviors occur as well as with any other incident requiring security response, detailed records will be kept of the incident, including a description of the incident, date and time of occurrence, response measures taken, and the date and time that measures were implemented. Proper authorities will be notified immediately, and all records (written and video recordings) will be provided.

Further note, to gain access to the area where Vault is located, all staff including the Senior/Responsible Person in Charge, must have passed through the manned security station as mentioned above.

Other Security Considerations:

For the protection of the consumer, operations, and the general public, it is important to ensure that adequate security measures are in place in all other areas of our facility, not only where the bulk of our activities are carried out. Great thought has been given to how we would accomplish our goal to have a totally secure building and grounds. Areas in question include our **parking lot, point of purchase area, and shipping/loading zone.**

Parking Lot: This area is located across the street directly in front of the building, and is subject to recorded, monitored video surveillance. As part of the security person's duties, scheduled walk about will ensure a physical inspection of the area, as well as instill public awareness of a security presence at our facility. Signs will be erected informing the public that the area is subject to surveillance, by recorded, monitored video cameras as well as security patrols.

In the event that any illicit and unauthorized behaviors occur as well as with any other incident requiring security response, detailed records will be kept of the incident, including a description of the incident, date and time of occurrence, response measures taken, and the date and time that measures were implemented. Proper authorities will be notified immediately, and all records (written and video recordings) will be provided.

Point of Purchase Area: This area is restricted to the general public, access only be granted to other licensed producers, licensed dealers, registered clients, hospital employees, or other relevant section 56 act exemption holders, and by appointment only. Appointments are limited to between the hours of 10:00 am to 4:00 pm Monday to Friday. This area has its own entrance as discussed in this document under the section entitled "Perimeter of Site". As with all areas, this area is protected by 24 hour recorded, monitored video surveillance, as well as a motion detector enabled alarm system that is monitored remotely by the alarm company. This area will be equipped with a buzzer system for the entrance, a monitor behind the counter that allows employees to visibly confirm the identity of patrons before allowing admittance, and a panic button located in a discreet location easily accessed by employees. This button will immediately trigger the alarm system and notify authorities when pressed.

Shipping/Loading Zone: Area at side of building where all deliveries are received, and product ready for shipment is loaded. No deliveries will be received outside of the hours of 10:00 am and 4:00 pm daily. Security person(s) as well as the Senior/Responsible Person in Charge will be present during all deliveries and loading of products. All deliver persons will be required to provide identification and sign a record giving their name, time, date and purpose for visit. This area is also protected by the 24 hour recorded, monitored video security system.

Attachment F:

May 25, 2018

C & K Rentals Ltd.
Attn: Ralph Duffitt
72 Marine Drive
Clarenville NL A5A 1V9



709.466.7937
info@clarenville.net
99 Pleasant Street
Clarenville, NL
Canada A5A 1V9

Dear Mr. Duffitt:

Re: Licensed Medical Cannabis Producer & Retailer – Approval

Your request to become a licensed producer and retailer of cannabis for medical purposes under Health Canada from the commercial property at 72 Marine Drive was approved by the Town of Clarenville.

This approval to produce and sell cannabis for medical purposes is granted as per the information presented to date, and subject to compliance with the following conditions:

1. **Final approval** of Health Canada Regulations.
2. Subject to Government Services approval and any licensing authorities. It should be noted that any proposed renovations required in order to accommodate the application are further subject to the approval of Council and Government Services.

We trust you find this satisfactory. Should you have any questions, please do not hesitate to contact the undersigned at 466-7937.

Sincerely,

TOWN OF CLARENVILLE

David Harris
Chief Administrative Officer

DH/db

Attachment G:

Registered Pesticides

The Pest Management Regulatory Agency (PMRA) maintains a database repository of registered pesticides that are approved for use on marijuana.

As of April 9, 2018, there are 21 registered pesticides approved by PMRA for use on cannabis (marijuana) that is produced commercially indoors. They are:

- Actinovate SP
- Agrotek Ascend Vaporized Sulphur
- Bio-Ceres G WP
- Bioprotec Caf
- Bioprotec Plus
- Botanigard 22 WP
- Botanigard ES
- Cyclone
- Doktor Doom Formula 420 Professional Use 3-in-1
- Influence LC
- Kopa Insecticidal Soap
- Lacto-San
- MilStop Foliar Fungicide
- Neudosan Commercial
- Opal Insecticidal Soap
- Prestop
- Purespray green spray oil 13E
- Rootshield(R) WP Biological Fungicide
- Rootshield HC Biological Fungicide Wettable Powder
- Sirocco
- Vegol Crop Oil

Information and labels for the pesticides approved by the PMRA are available in the [Pesticides and Pest Management](#) section of the PMRA website.

If licensed producers have questions or concerns regarding pesticides, or would like approval on the use of particular pesticides, they are encouraged to contact [PMRA](#) for information.