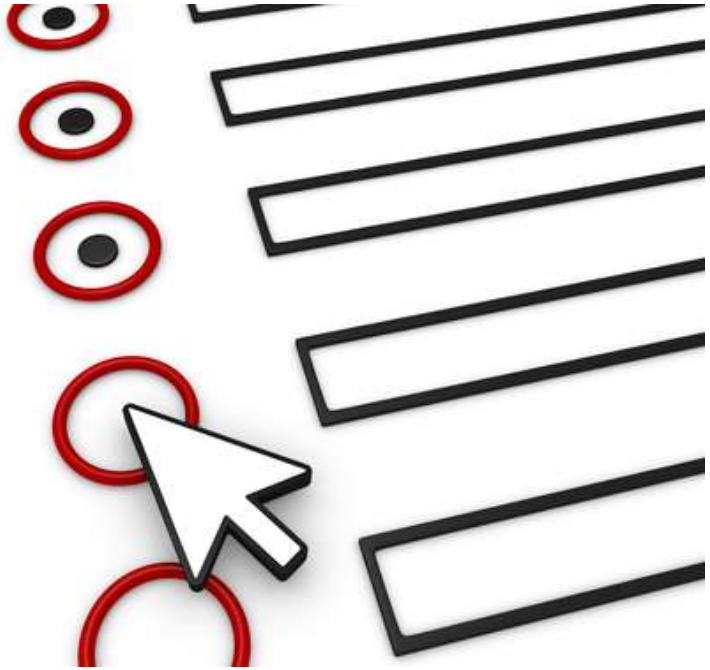
Cannabis Licensing Authority
Jamaica

Building an Industry;
Cultivating Responsibly

Compliance & Monitoring

December 2017

COMPLIANCE



COMPLIANCE

Site inspections are conducted to ensure compliance with the regulatory requirements by applicants and licensees for:

- Obtaining a licence
- Keeping a licence
- Renewing a licence

Pre-licensing Site Inspection

Today we will focus on site inspection to obtain a licence.

- That inspection is called a Pre-licensing site inspection.
- Conducted by a CLA site inspector
- Is solely for meeting some basic security measures requirements

Pre-licensing Site Inspection

DEFINITION OF SECURITY

Secure, in relation to any premises, includes having a fully fenced perimeter and entrances and exits that are subject to security procedures in accordance with these Regulations.

FENCING

Pre-licensing Site Inspection

The perimeter may be comprised of:

1. Cultivation site Fence – Chain-link

2. Cultivation site fence - Hog wire, square mesh, welded mesh, woven mesh (with the spacings not greater than 4 to 6 inches)

Pre-licensing Site Inspection

- Fence height is 2 metres for Tier 1 cultivation. Approximately 6 feet seven inches. 6ft 7 in.
- Fence height is 2.5 metres for Tier 2 and 3 cultivation. Approximately 8 feet 2 inches. 8 ft 2 in.

Pre-licensing Site Inspection

- For all other licence categories with a site the acceptable fencing is chain link or concrete wall
- Minimum 6 feet high if the perimeter fence is separated from the building(s)
- The building walls may substitute as the perimeter fence

Pre-licensing Site Inspection

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- Can have mixed fencing of any of the five main fencing with barb wire on top up to required height
- BUT base must be at least three feet high from ground up AND
- Barb wire must be spaced no more than 6 inches apart. 6 inch spacing.

Pre-licensing Site Inspection

- Secure parking must be within the cultivation site
- There must be a driving road that leads into the cultivation site
- A cultivation site must be a minimum of 182 metres or approximately 200 yards or 600 feet away from any school

Pre-licensing Site Inspection

- For non-cultivation sites, where there is no enclosed perimeter fence that is exclusively for the use of the applicant, or where there is common use parking spaces whether the premises is fenced or not fenced, the applicant must submit to the CLA at the time of the site inspection:

Pre-licensing Site Inspection

a. A set of procedures that will ensure that there will be the maintenance of secure parking for receivals or/and deliveries, as is applicable
b. An acceptable video recorded demonstration of the procedures to the CLA on the inspection day.

ELECTRONIC SURVEILENCE

Pre-licensing Site Inspection

- CCTV to capture full perimeter, parking, all gates and doors, all faces entering the site, all persons entering or leaving areas in which ganja is handled or stored, all persons handling ganja in those areas.

Pre-licensing Site Inspection

- Recommended minimum 2 to 3 mega pixel cameras
- Can read/recognize faces and licence plates up to 50 feet from camera
- 24 hrs. monitoring for cultivation sites and all storage areas.

Pre-licensing Site Inspection

- Offsite CCTV monitoring for most sites
- Exception are Retail and R & D
- Web-enabled access for Tier 2 and 3 cultivators
- Internet access and electricity are necessary

Pre-licensing Site Inspection

- Draft security contracts for Tiers 2 and 3 cultivators
- Fence anchored to the ground by concrete, steel pegs spaced such that there can be no access under fence, or fence buried in 12 inches or more of hardened soil like clay etc

OTHER SECURE MEASURES

Pre-licensing Site Inspection

1. Secure locks. Double turn mortise or deadbolt. Knob locks are not secure.
2. Secure doors for ganja storage and ganja handling areas.

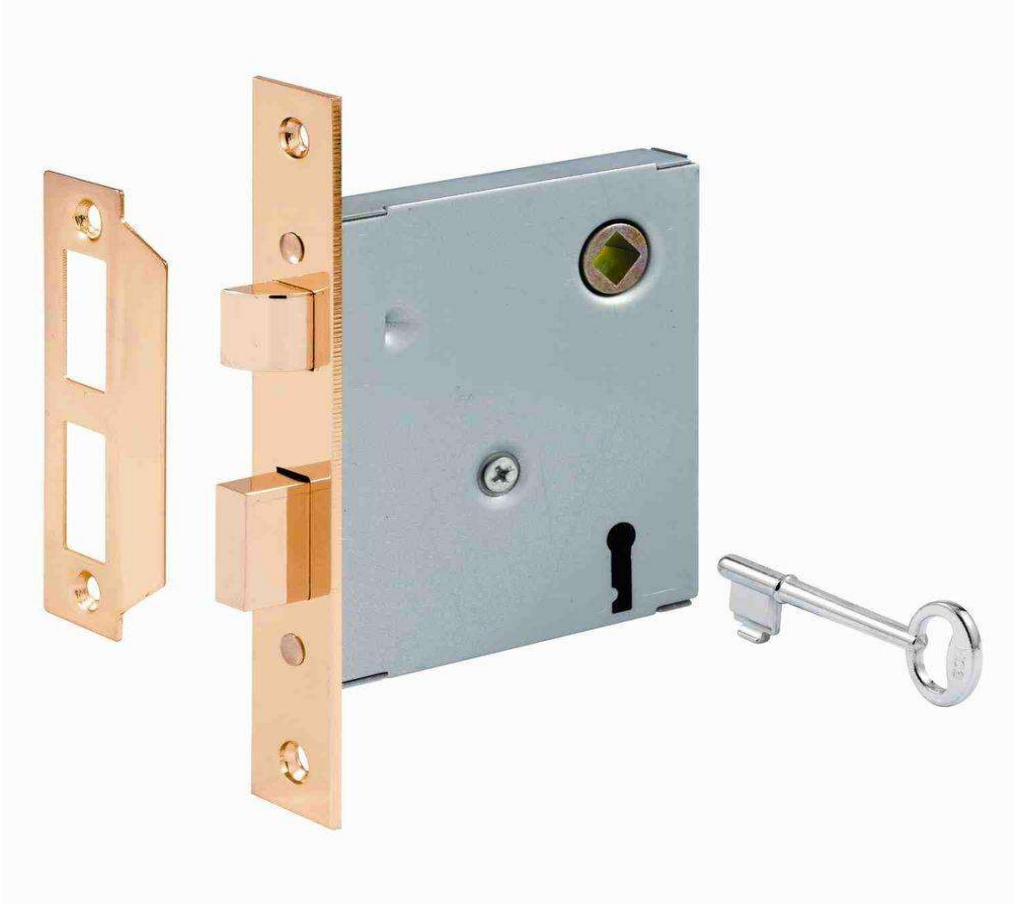
- Solid metal, hollow metal, solid wood

Pre-licensing Site Inspection

3. Closed shackle padlocks for gates and doors like container doors that use padlocks

4. If gate chains are utilized, then it should be very thick

Pre-licensing Site Inspection



Pre-licensing Site Inspection

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- Ply door is not secure. Must have security grill or burglar bar support
- Glass front and windows if not grilled must be backed up by intrusion detection systems – monitored burglar alarm system etc

ACCESS CONTROL

Pre-licensing Site Inspection

- Limit access to ganja to the smallest number of persons
- Access control system and log for Processor, Retail, R & D
- Manned security posts for Processor