

CANNABIS LICENSING AUTHORITY SECURE DEFINITION EXPLANATION ALL LICENCE TYPES

The Cannabis Licensing Authority is mandated to regulate Jamaica's Medical Cannabis Industry. The Dangerous Drugs (Cannabis Licensing) (Interim) Regulations, 2016 gives effect to this mandate. Pursuant to Regulation 30, the Authority may issue codes of practice and directives on matters concerning the regulation of the industry. The Secure Definition Explanation Document sets out the security requirements for handling ganja on licensed premises. The terms of this document must be complied with, in order that the premises where ganja is handled is 'fit for purpose' and secure.

SECTION 1 - GENERAL CONDITIONS

- 1. The site must have its own entrance and exit. Where operations are vertically integrated, site separation must be maintained.
- The site shall maintain a log of all persons entering and exiting the site as well as each designated area within where ganja is handled (cultivated, dried, trimmed, processed, researched, stored, packaged, sold, etc.)
- 3. Each site must have its own fully enclosed storage area /room.
- 4. Access to ganja storage area must be limited to the smallest possible number of persons.
- 5. Storage Rooms made of plywood board are not allowed.
- 6. If on a particular licensed premises partitioning is required to clearly identify or separate designated areas (with the exception of the Storage Area/Room), then the partition can be made of: Plywood of 5/8 of an inch thickness along with 4 inches dress wood, a wall constructed of concrete/ cement/ block and steel or glazed/ glass panel of 3/8 thickness (Please note that the partition must fully extend to the roof to the floor/ adjoining surface).
- 7. Secure locks for the purpose of this document are single cylinder deadbolt, mortise and closed shackle.
- 8. Grilles mentioned in this document are to be no less than ½ inch in diameter.
- 9. Emergency exits are allowed (one-way doors).
- 10. All plants/ganja on the site must be tagged with a unique identifier.
- 11. The site shall implement and maintain a system to track and trace all ganja on their site.
- 12. Standard Operating Procedures are to be established by applicants or licensees and submitted for review by the Authority.
- 13. The site is required to keep an inventory accounting for ganja /ganja by-products in each designated area where ganja is handled. Inventory must include consecutive numbering, the unique identifier of each plant, strain, number of plants per strain, total number of plants per designated area and wet/dry weights (where applicable).
- 14. Upon request of the Authority, any document concerning the operations of the site deemed necessary to monitor compliance should be submitted by the licensee.
- 15. The Authority at any reasonable time by day or by night may visit and inspect any licensed site.
- 16. All areas subject to surveillance must have the capacity to store footage for a minimum of 30 days.
- 17. A Security Plan to the satisfaction of the Authority.
- (N.B. Fencing/Perimeter, Secured Gate and Parking do not apply if the site is located on a plaza, mall, office building or other public, shared spaces in respect of Retail Herb Houses, Processor and Research and Development

Licenses).		
STECTION 2 - FENCE REQUIREMENTS		
Fence Height	PROCESSING/RETAIL/RESEARCH & DEVELOPMENT LICENCE	
	o A minimum of 1.8 meters or 6 feet	
	CULTIVATOR TIER 1 LICENCE	
	 A minimum of 2 meters or 6 feet, 7 inches 	
	CULTIVATOR TIER 2 OR TIER 3 LICENCE	
	○ A minimum of 2.5 meters or 8 feet, 2 inches	
Fencing Type	• Chain link or fencing of comparable equivalent security such as hog wire, square mesh or welded mesh may be used. (N.B. Each square must not be bigger than 4 inches by 4 inches where chain link, hog wire, square mesh or welded mesh is used).	
	• Chain link, hog wire, square mesh or welded mesh may be used for a minimum of three feet (3ft) after which barb wire or razor wire may be used at six inches (6') apart to complete the fencing up to the prescribed height as stated above. (N.B. – The barbed wire must be sturdy to resist pressure/agitation and be able to maintain the consistency in spacing stated above).	
	 Perimeter fencing may also be made from cut stone and concrete blocks up to the prescribed heights as stated above. 	
	Fencing may also consist of a combination of any type mentioned above.	
Anchorage of Fence &Fence Post	• Fence must be buried twelve (12) inches below the surface (may be anchored with steel pegs, concrete or dirt mound, toe wall or any other method approved by the Authority. The mound is not included in the required height above ground.	
	• Where the dirt mound option is used for anchoring the fence, at the end of one year the fence must be anchored by concrete or steel pegs.	
	• Fence posts must not be more than ten feet (10 ft) apart.	
	• Fence post must be properly planted/anchored in order to resist pressure/agitation and be able to support the weight of other materials attached to ensure the integrity of the fencing.	
	 Prevention of intrusion and unauthorized access is paramount, therefore, there should be no gaps below or along the perimeter fencing. 	
SECTION 3	3 - ELECTRONIC SURVEILLANCE	
	 24-hour security surveillance system in place that must provide full view of the activities within all designated areas where ganja is handled (cultivated, dried/cured, trimmed, processed, researched, stored, packaged, sold, etc. whilst preventing 'blind spots. 	
	• 24-hour security surveillance must capture clear pictures of the faces of persons entering and exiting designated areas where ganja is handled.	
	 24-hour remotely accessible off- site and or web-enabled surveillance system (if not web-enabled or being monitored by a PSRA Certified Security Company, the physically off-site system should be within 1 mile of the proposed/licensed site for ease of access by the Authority (applicable to Cultivators and Processors). 	
	 Cameras should be able to capture faces of persons entering through the main gate of the site. 	

Cameras should be able to capture, at a minimum of 50 feet from the camera, the licence plate of the transportation vehicle in the designated loading/unloading/sales area. **Conditions** PROCESSING AND RETAIL LICENCE Specific to In the case of Processor: Licence Adequately staffed Security Post (PSRA Certified Security Officer, current JCF Type or JDF members) o Off-site surveillance system In the case of a Retailer and Processor: o A secure area dedicated for receival of ganja and ganja by-products which will be called the Receival Area". Designated enclosed storage and processing areas. Please note that in the case of Retailers, processing is limited to packaging. **CULTIVATOR TIER 1, TIER 2 AND TIER 3 LICENCE** In the case of all Cultivators: The site must have clearly defined designated areas for each aspect of the cultivation process (nursery, grow areas, drying/curing/trimming, storage) Off-site surveillance system In the case of a Tier 2 or Tier 3 Cultivator: o A draft contract should be in place for the Pre-Licensing Site Inspection and a current signed contract in place if the licence is granted. The contract must speak definitively to the provisions outlined in Regulations 11 (2) (e) (i) (ii) (iii). o Reports from the PSRA certified security company should be submitted to the Authority on a weekly basis. RESEARCH AND DEVELOPMENT LICENCE In the case of a Research and Development Experimental Licence: The site must have enclosed designated areas for aspects relating to the specific licence type, to include experiment In the case of a Research and Development Analytical Services Licence: The site must have enclosed designated areas for aspects relating to the specific licence type, to include analysis **SECTION 4 - GATES & PARKING** PROCESSING/RETAIL/RESEARCH & DEVELOPMENT LICENCE Height of Gate o A minimum of 1.8 meters or 6 feet CULTIVATOR TIER 1 LICENCE O A minimum of 2 meters or 6 feet, 7 inches

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	CULTIVATOR TIER 2 OR TIER 3 LICENCE
	o A minimum of 2.5 meters or 8 feet, 2 inches
Types of Gate and Securing Gates	• Chain link, hog wire, square mesh, welded mesh or grille. (<i>N.B.</i> each square must not be bigger than 4 inches by 4 inches).
	Electronic gates may be used.
	• In the case of a grille gate, any design chosen must not have spaces that exceed the recommended 4 inches by 4 inches gaps
	• Gates made of chain link, hog wire, square mesh, welded mesh or grille gates must have at least one (1) locking point/mechanism.
	• Gates of mentioned types must be placed at a maximum of 4 inches above the ground.
Parking	• Sufficient (secure) parking within the site for the purpose of loading ganja/receiving ganja. (<i>N.B.</i> – <i>To be assessed and approved by the Authority upon inspection</i>).
SECTION 5 - DOORS & WINDOWS	
	• Doors should be made of solid wood, sheet metal, solid metal or any other type of material approved by the Authority. Glass Doors are allowed except for the storage area (must be no less than 3/8 inches thick and placement of glass doors is subject to the approval of the Authority)
	Ply doors are not allowed
	Solid metal, solid wood and sheet metal doors require a minimum of two (2) secure locks
	• The security grille must have at least one (1) secure lock/locking mechanism (<i>NB</i> - <i>A security grille on any type of door mentioned will substitute for one</i> (1) secure lock on the door).
	 Access points to areas where ganja is handled must be equipped with access control mechanisms such as: electronic access control, mechanical locking systems, or any other mechanism approved by the Authority.
	WINDOWS/GLAZED PANELS
	Where ganja is stored, windows and glazed panels must be reinforced to prevent unauthorized access.
	A security grille and/or an intrusion detection device e.g. motion sensors and panic alarm tied to a PSRA monitoring and response service provider is required.
	The Authority reserves the right to vary any security arrangement contained therein in any circumstance it reasonably believes is best to ensure a site is fit for purpose.