



CLEARVIEW

REPORT TO COUNCIL

Report Number: CAO-009-2019
Department: Community Services (Planning & Development)
Meeting Date: January 7, 2019
Subject: Recreational Cannabis

RECOMMENDATION:

Be It Resolved, that Council of Township of Clearview hereby:

- 1) Receive report CAO-009-2019 from the Chief Administrative Officer regarding recreational cannabis.
- 2) Advise the Alcohol and Gaming Commission of Ontario (AGCO) by January 22, 2019 that the Township of Clearview does not wish to host cannabis retail stores in their communities at this time.

BACKGROUND:

Current Cannabis Legislation

Recreational cannabis became legal on October 17, 2018 under Bill C-45. The rules were set by the Federal Government with more restrictive rules being allowed to be set by the Province of Ontario.

Facts:

1. The Province of Ontario restricts the use of recreational cannabis to those being at least 19 years of age.
2. The maximum number of plants that a household (not per person) can grow is 4.
3. The maximum amount of cannabis you can possess is 30 grams (approximately 1 ounce).
4. The Smoke Free Ontario Act will regulate where you can smoke or vape cannabis. Therefore, smoking and vaping cannot take place within enclosed public places, enclosed workplaces and other specified places. The

municipality can get more restrictive should they wish by restricting it's use in parks for example.

5. Cannabis cannot be used while driving.
6. No cannabis can be in your system while driving if you are: under 21 years of age; have a G1, G2, M1 or M2 driver's license; if the vehicle requires an A-F license or commercial vehicle operators registration (CVOR); or if you are driving road building equipment. The police can administer a federally approved oral fluid screening.

Ontario Regulation 497/18 Amending 468/18

On December 13, 2018 the Government of Ontario amended Ontario Regulation 468/18 which identifies that at this time 25 retail store licenses will be issued until such time as there are more authorizations issued, no store will be allocated within a municipality with less than 50,000 persons.

The current regulation limits the stores as follows:

1. The Toronto Region may have a maximum of 5 retail stores.
2. The GTA Region may have a maximum of 6 retail stores.
3. The North Region may have a maximum of 2 retail stores
4. The East Region may have a maximum of 5 retail stores.
5. The West Region may have a maximum of 7 retail stores.

This regulation also includes other controls to ensure that there is not a monopoly on the market and that the licenses are distributed through a lottery process.

Retail Sales Requirements and the Opt-in or Opt-out option

Currently the only place to buy recreational cannabis is on-line from the Ontario Cannabis Store. You have to provide proof of age when the package is delivered, and no package will be left unattended.

The Province will be licensing retail operations throughout the Province on April 1, 2019. However, licenses will not be granted to locations within municipalities who choose to opt-out of the retail program. If a municipality chooses to opt-out, it must do so by January 22, 2019. Once a municipality chooses to opt-out it can then later opt back in, but if it does not opt-out by the deadline, it cannot later opt-out. To opt-out, the municipality must pass a resolution indicating that they do not wish to host cannabis retail stores in their communities. This resolution must be sent to the Alcohol and Gaming Commission of Ontario (AGCO), who is responsible for recreational cannabis licensing in Ontario, by the deadline.

It is important to note that municipal official plans, zoning by-laws and municipal licensing by-laws are not permitted to regulate cannabis retail operations. The AGCO will determine within a municipality that has opt-ed in, what locations will be permitted. It is expected that wherever a general retail store would be allowed, a cannabis store may be allowed.

Store operators have to apply and each business owner, manager, landlord will be reviewed by the Province, and each owner (Retail Operator License) and store location (as one owner may have multiple stores, each requires a Retail Store Authorization) will require a license. Any persons operating a retail location outside of the licensing requirements or being associated with organized crime, or not in tax compliance, will be prohibited from obtaining a license. Once the Province issues a permit, a notice must go up within 24-hours of issuance.

The AGCO will also require particulars regarding store format, security requirements and staff training requirements. Retail stores must have high quality 24-hour surveillance inside and outside stores. Self-service is not allowed, and customers are not permitted to handle the product until purchased. Tamper-proof locked containers will be permitted to allow customers to look and smell the cannabis. Cannabis that cannot be sold must be destroyed monthly. Reduced pricing or on sale product to encourage sales is not permitted.

The Province has also imposed a 150 metre (500 foot) separation distance between retail operations and schools. Stores will be stand-alone stores and no one under the age of 19 is permitted to enter a cannabis store.

Commenting Period

Prior to a store location being given final approval (if the municipality does not opt out), there will be a 15 day commenting period to the Province. Notice is to be posted on the storefront for comment. It does not appear as though the municipality will receive a written notice in order to comment. This means that notice might be given and the municipality may miss the commenting period, which is concerning. Further, 15 days is not sufficient time for a municipality to take a report to Council in order to obtain comments. Therefore, some other process would need to be in place so that staff of the municipality can comment on its behalf. Staff and the Association of Municipalities (AMO) suggests a policy (Municipal Cannabis Retail Policy Statement) be put in place by the municipal Council so that key staff at can respond to the AGCO. This policy should focus on setting out significant local sensitive uses, but obviously not prohibit retail stores altogether. The policy statement should align to the three Provincial interest objectives: public health and safety, protecting youth and ending illegal sales of cannabis. With that in mind, sensitive land uses may include: day cares, sports fields, community centres, libraries and youth centres.

The submissions may only address these three things:

1. protecting public health and safety;
2. protecting youth and restricting their access to cannabis; and
3. preventing illicit activities in relation to cannabis.

The applicant has 5 days to respond to any submissions. The decision of the AGCO to issue a permit is final and cannot be appealed.

Provincial Funding – Financial Incentive to Opt-in

The Province will provide funding to municipalities to help with the implementation costs of recreational cannabis. Funding will be based on the number of households in a municipality with the minimum amount being \$10,000 in two installments of \$5,000 each. Clearview has now received the First Payment – Allocation Notice attached to this report. Clearview has 6243 households. The Province has committed 127.50 per household for a total of \$7,960.00 to Clearview. The Province has committed \$40 Million in funding over two years. Municipalities that opt-out will receive a maximum of \$5,000 on the second installment.

The Province is also considering allocating some funds for unforeseen circumstances that may arise for those municipalities that opt-out. Further, the Province will provide 50% of the surplus of the Provincial portion of the Federal excise duty over the first two years, if it exceeds \$100 Million to municipalities that have not opted out.

COMMENTS AND ANALYSIS:

By January 22, 2019, the Township can choose to opt-out of hosting retail cannabis stores within the municipal boundaries and then at any time in the future, opt in. If the Township does nothing, this is an automatic opt-in.

Staff does not have any research to indicate whether a retail cannabis store would be an economic driver for the Township or a detractor for adjacent businesses. Business retention and expansion is just as important as businesses attraction. Should the municipality opt out of the retail opportunity, information and experiences from other municipalities may be of assistance as to whether or not the municipality wants to opt in.

Should the municipality opt in, it has no control over the location of the retail locations, other than to provide comment to the Province. A retail operation could be located anywhere within the municipality, but presumably where retail is a normal use such as downtown or shopping center locations. Another location may be at the grow operations themselves, which may include hospitality similar to wine tasting. This is unknown at this time.

If the municipality opt-out, it will enable more time to research and consider the effects of retail stores on other locations. It will also allow more time for the municipality to have a good understanding of all the Provincial requirements that are, as of the writing of this letter, not yet determined.

With respect to retail locations, since there will not be time to report to Council within the 15 day comment period, if the Township opts in, Clearview could create a protocol for comment back to the Province.

Other things to consider is whether the municipality desires to pass a By-law that prohibits the smoking and vaping of cannabis in municipal parks. The Municipality may also consider restrict advertising of cannabis products on municipal properties.

Regarding signage on private property, although municipal official plans, zoning by-laws and municipal licensing by-laws are not permitted to regulate cannabis retail operations, municipal sign by-laws passed under the Municipal Act may be able to restrict individual signage. This may allow the municipality to require that the cannabis plant is not part of any signage or other similar restrictions as Council may require.

Staff have included a recommendation for Council's consideration, that Clearview opt-out at this time. The municipality can then undertake additional public consultation and if we consider opting back in, the Township can develop a policy for reviewing applications for comment back to the AGCO.

CLEARVIEW STRATEGIC PLAN:

The strategic direction to be considered includes:

Item 3.2 to Development and implement policies that focus on small business attraction, development and support.

COMMUNICATION PLAN:

There is no communication plan proposed with this report.

FINANCIAL IMPACT:

There are no financial implications to this report.

REPORT SCHEDULES:

1. Ontario Publication – Moving Forward with Cannabis Retailing – Technical Briefing September 28, 2018
2. AMO – Municipal Cannabis Update – November 21, 2018

PREPARED BY:

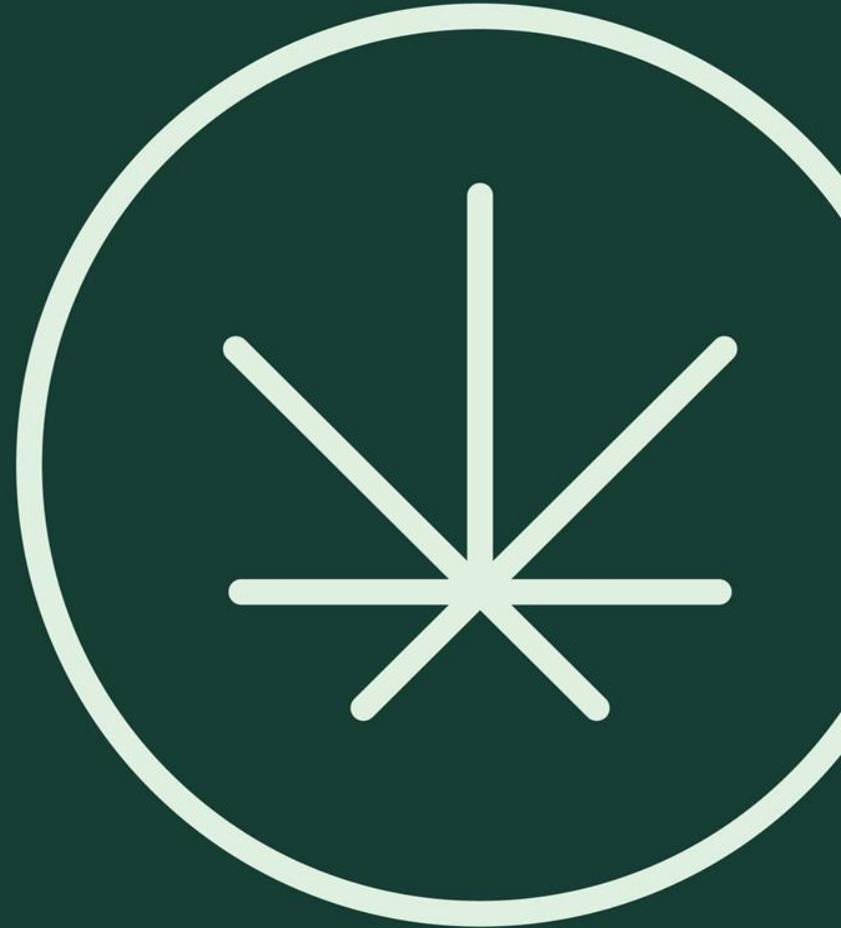
Stephen W. Sage, CAO

REVIEWED BY:

Senior Management Team

Moving Forward with Cannabis Retailing

Technical Briefing
September 27, 2018



Enabling Private Retail

- The government is introducing legislation which, if enacted, would create a tightly regulated licensing model and regulatory framework for private retail of cannabis in Ontario
- The design of the model was informed by engagement with municipalities, Indigenous leadership, and key public safety, industry, and health stakeholders
- In this new model:
 - Private retailers would be licensed by the Alcohol and Gaming Commission of Ontario (AGCO)
 - The Ontario Cannabis Retail Corporation (OCRC) would be the exclusive wholesaler and online retailer of cannabis in the province
 - Municipalities would be able to pass a council resolution by January 22, 2019 to opt-out of retail stores
 - First Nation communities would be able to opt-out of cannabis deliveries and retail stores
- The province will provide \$40 million over two years to help municipalities with the costs of recreational cannabis legalization
- Proposed legislation, if enacted, would support this direction with the intent of enabling the AGCO to begin to accept applications in December 2018



Provincial Regulator

- The government is introducing legislation which, if enacted, would enable the implementation of a tightly regulated licensing and regulatory framework for private storefront cannabis retailing in Ontario and establish the AGCO as the provincial regulator for cannabis storefronts
- AGCO currently licenses, regulates and ensures compliance in the alcohol, gaming and horse racing industries in Ontario, and as such offers considerable experience and expertise as a regulator of controlled substances
- If the legislation were passed, AGCO, as the independent provincial regulator, would oversee the private channel and ensure the province's objectives related to cannabis retailing, protecting youth and combatting the illegal market are met
- If the proposed legislation is enacted, AGCO would:
 1. Issue a Retail Operator Licence after investigation (i.e. due diligence) into the business
 2. Issue a Retail Store Authorization to a licensed Retail Operator for the operation of a specified retail store after a local public notice process (administered by the AGCO), and upon confirmation of meeting certain requirements (e.g. safety and security plans in place)
 3. Issue certain individuals a Cannabis Retail Manager Licence
 4. Conduct compliance and audit processes, including store inspection prior to opening



Licensing Parameters

Licensing Eligibility

- The proposed legislation, if enacted, would establish due diligence requirements and specific eligibility criteria for the issuance of licenses and store authorizations, including financial responsibility and conduct based on the principles of integrity and public interest.
- If legislation is passed, persons operating in contravention of provincial and federal Cannabis legislation would not be eligible to operate a cannabis retail store
- The proposed licensing framework would:
 - Not cap the total number of licenses or authorizations
 - Enable ownership concentration limits for private retailers to be established by regulation in advance of December 2018 following appropriate consultation
 - Prohibit the sale or transfer of licences
 - Permit licensed producers to operate a single store at a single production facility in Ontario, per company, including all affiliates
 - Require authorized retailers to display the cannabis retailer seal and create new offences for false representations as an authorized cannabis retailer.

Store Operating Parameters & Distance Buffers

- Additional store operating parameters (e.g. store format, security requirements, staff training requirements) would be established by regulation or by AGCO Registrar's standards and requirements subject to additional consultation and before the AGCO begins accepting applications in December 2018
- A distance buffer between private cannabis retail stores and schools would be set through regulation in advance of December 2018 following further consultation with municipalities and key stakeholders



Municipalities

- It is proposed that local municipalities would be provided with the opportunity to opt-out of cannabis retail stores in their communities by January 22, 2019
 - Municipalities that opt-out of cannabis retail stores could allow them in the future, but municipalities that do not opt-out of stores by January 22nd, cannot opt-out of them at a later date
- In municipalities that have not opted-out of stores, if a request for a store location authorization request is received, the AGCO would initiate a public notice process in which the affected municipality and the public would have an opportunity to identify any comments within a 15-day period
 - AGCO Registrar would consider any comments raised through this process when making its final decision to grant an authorization for that location
 - MAG will continue to consult with municipalities on the implementation of this process
- Municipalities would not be able to designate cannabis retail as a separate land use from retail generally or create a cannabis retail licensing regime within their jurisdiction



Municipal Funding

- The province will provide \$40 million over two years to help municipalities with the implementation costs of recreational cannabis legalization, with each municipality receiving at least \$10,000 in total
- As soon as possible this year, the province would make the first payment to all municipalities on a per household basis, with at least \$5,000 provided to each municipality
- The province would then distribute a second payment following the proposed deadline for municipalities to opt-out, which would be January 22, 2019
 - Municipalities that have not opted-out as of that date would receive funding on a per household basis
 - This funding would support initial costs related to hosting retail storefronts
 - Municipalities that have opted-out would receive only a second \$5,000 each
- The province is considering setting aside a certain portion of the municipal funding in each of 2018-19 and 2019-20 for unforeseen circumstances, and priority would be given to municipalities that have not opted-out
- Finally, if Ontario's portion of the federal excise duty on recreational cannabis over the first two years of legalization exceeds \$100 million, the province will provide 50% of the surplus only to municipalities that have not opted-out as of January 22, 2019



First Nations

On Reserve Delivery Prohibition

- Proposed amendments would require that OCRC implement a prohibition of on-reserve delivery when requested by a First Nation community through a band council resolution

Retail Store Opt-out & Approval

- First Nations would be able to opt out of private cannabis retail stores by way of band council resolution
 - A First Nation community's ability to prohibit stores on reserve would not be time-limited to accommodate for First Nation election cycles and ongoing community engagement
- A band council resolution would be required to approve a store on reserve before the AGCO issues a retail store authorization

Agreement with Council of the Band

- The Attorney General would be able to enter into agreements with First Nation communities on a wide scope of legislative components (e.g. minimum age, retail, etc.)



Places of Use

- Smoking of cannabis (medical and recreational) would be prohibited in the same places where the smoking of tobacco is prohibited (e.g. enclosed public places, enclosed workplaces, and other specified places)
 - The vaping of cannabis would be captured by existing provisions in the *Smoke-Free Ontario Act, 2017* (not yet in force) that will regulate the use of an electronic cigarette
- All methods of consuming cannabis (e.g. smoking, vaping, ingestion) would be prohibited in vehicles and boats that are being driven or under a person's care or control, subject to certain exceptions that would be prescribed by regulation (e.g. use of medical cannabis edibles by a passenger who is a medical cannabis user)
- Generally speaking, municipalities could pass by-laws further restricting the use of cannabis
- The government's commitment to review rules regarding vapour products prior to implementation of the Act are also included in the bill
 - Rules for the display and promotion of vapour products would be separate from the display and promotion rules for tobacco products and tobacco product accessories:
 - Any seller of vapour products could display and promote products subject to restrictions outlined in the federal *Tobacco and Vaping Product Act*. There would be no additional provincial restrictions
 - Specialty vape stores would be permitted to let customers sample vapour products within the store, subject to certain conditions



Ontario Cannabis Retail Corporation

- On October 17th, the OCRC will be the exclusive online retailer for legal cannabis in Ontario
 - Consumers 19 and older will be able to purchase cannabis via OCRC's online retail platform
 - Online sales would be implemented in a socially responsible manner, including secure home delivery with age verification at the customer's door, and no packages left unattended at the door
- The OCRC would also be the exclusive wholesaler to future private retail stores
- Proposed changes to the governance structure of the OCRC would result in the agency's board reporting directly to the Minister of Finance rather than operating as a subsidiary of the LCBO
 - This change would better support the mandate of OCRC as Ontario's online retailer and cannabis wholesaler



Next Steps

- If legislation is enacted, regulations would be developed to enable the AGCO to accept applications in December 2018
- Municipalities would have the opportunity to opt out of retail stores by January 22, 2019
- The government will continue to consult on further details to enable private retail stores by April 1, 2019





Municipal Cannabis Update

Information to help municipal staff prepare reports for councils

November 21, 2018

Purpose:

This update provides information on the province's regulatory framework, funding and AGCO licensing. This will help municipal staff prepare its report to council on elements for its decision-making on whether to have cannabis retail stores.

Overview

The provincial government has committed to allowing private recreational cannabis retail stores throughout Ontario starting April 1, 2019. As recreational cannabis is a legal, controlled and regulated product, cannabis stores will be considered like any other type of retail and as such, no zoning changes are needed.

In legalizing cannabis for recreational purposes, the federal, provincial and municipal governments share three interrelated goals: protecting youth, public health and safety, and ending illegal sales of cannabis. The provincial government has established a regulatory framework ([O. Reg. 468.18](#)) under the recently passed *Cannabis Licensing Act, 2018* that provides further clarity on how these private businesses will be [licensed and regulated](#) by the Alcohol and Gaming Commission of Ontario (AGCO). These regulations deal with various elements of the retail regime including matters in which municipal governments may have an interest.

Key Points in the Regulations

The regulations speak to how a license to open a cannabis store will be issued. The full details of the AGCO process have not yet been released, however the AGCO will issue [guidance](#) as the regime is finalized. It is offering webinars (November 27 - [10:00 am](#) / [3:00 pm](#)) to prospective retailers and interested parties.

AGCO process will begin with it reviewing and completing due diligence on applications from corporations and individuals seeking to sell recreational cannabis. The licensing regime will have three parts: operator approval; retail site location approval; and store management licensing.

Municipal governments have the one-time opportunity to opt out of allowing retail cannabis stores in their communities. **The decision to opt out must be made by January 22, 2019. Unless a municipal government opts out as per Ontario Regulation 468/18 s. 22, they opt in to recreational cannabis retail sale by default.**

To protect youth, the provincial cannabis retailing regulations include a 150-meter buffer area for cannabis stores to keep them separated from schools. No buffers from any other use has been specified by the regulations.

In our discussions with some members, it has been proposed that a municipal government may consider setting out a policy statement identifying specific and significant locally sensitive considerations or uses, to best represent the expectations of the community in allowing cannabis retail. This statement would provide direction to municipal staff input to the AGCO within its 15-day review period.

The AGCO cannabis licensing process, much like the process for liquor licensing applications, requires that a notice of a proposed cannabis store site be posted for comments from area residents and businesses before a site authorization is made. At this point, the municipal

government will not be provided pre-notification of the application, but can make comments about whether the proposal is in the public interest as described by regulation.

While there is no regulatory requirement for the AGCO to act on municipal input, it is reasonable that a council could choose to set out any locally sensitive uses as part of the decision to allow cannabis retail stores or to opt out. Setting out these sensitive uses would specify the expectations of the community as cannabis retail sites are proposed. However, care needs to be taken so that this statement would not prohibit any cannabis retail store from locating in a municipality. Opting out is the appropriate mechanism for not permitting any stores in a municipality.

The province has just released the funding approach to help municipal governments offset implementation costs. Please see the Minister of Finance's [letter](#) of November 20 to the AMO President. A similar letter is being sent to all Heads of Council. In addition, a letter from the Deputy Minister of Finance to municipal treasurers with more details will be sent in the coming days.

Please note that while opting out can be reversed after January 22, the municipal government will not gain any additional funding from the Ontario Cannabis Legalization Implementation Fund (OCLIF) than it had as of January 22 when it opted out- beyond the minimum second payment of \$5000.

Store Location Approval Steps

The AGCO will have a 15-day window for public and municipal government comments for each store site proposed by an approved operator. The legislation provides that municipal comments should focus on whether a proposed storefront location is in the public interest, as defined in the [regulation](#). In the regulation, public interest is defined as public health or safety, protecting youth and eliminating the illegal market.

If a municipal council accepts retail stores, AMO suggests that a 'Municipal Cannabis Retail Policy Statement' be adopted by council. Such a policy statement could address what it sees as significant local sensitive uses. This would give municipal staff direction in responding to the 15-day window during the commentary process. For example, a policy statement may identify specific sensitive uses and express some parameters to consider proximity to these sensitive areas, or may set out concerns regarding store concentration¹ in certain areas of their communities.

It is recommended that municipal governments identify a key senior staff lead for proposed cannabis store notices from AGCO and to provide a one-window approach to coordinate municipal input within the 15-day commentary period. This will ensure AGCO has every opportunity to take note of municipal government considerations. This key contact should be able to gather information from various municipal departments as necessary, provide maps and be able to convey council policy.

Below, AMO has provided a draft Municipal Cannabis Retail Policy Statement template that may help municipal governments that choose to create such a policy. The template helps municipal government officials begin to think about the issues and criteria they may wish to note when considering a proposed cannabis retail site. Notes for consideration of what we understand to be

¹ Note that store concentration will ultimately be determined by the market demand, however municipal governments may wish to set out any criteria through which they may consider this in future.

an effective municipal policy statement are provided in the shaded boxes and would not form part of the policy statement.

For alignment between the regulations and AGCO mandate, municipal comments in the process, whether through a municipal cannabis policy statement or not, must focus on the three provincial public interest objectives: public health and safety, protecting youth and ending illegal sales of cannabis.

Municipal staff are encouraged to read the regulations and AGCO [guidelines](#) as they are developed and made available to understand eligibility requirements for operators how cannabis retail businesses are expected to operate. AMO will continue to provide information and analysis on this and other matters as it becomes available.

Draft Municipal Policy Statement Template:

The template can be used by a municipality that has chosen to allow retail sales of recreational cannabis.

Purpose & Vision

The purpose of this policy statement is to provide a format for municipal government input to the Alcohol and Gaming Commission of Ontario (AGCO) as well as help prospective recreational cannabis retailers in their consideration of location of cannabis retail stores in (name of municipality).

The AGCO is the provincial authority that licences cannabis retail operators, authorizes cannabis retail locations and licenses senior store staff. Municipal governments have no licensing authority.

The AGCO regulates and reviews all aspects of the retail operation including municipal and public input, that the proposed store location is consistent with the public interest as defined in the regulations.

The Municipality ofhas chosen to allow retail sales of recreational cannabis. The following provides municipal staff with guidance on commenting to AGCO when notice on a specific proposed cannabis retail store site is provided on the site location.

Principles for Cannabis Retail Store Locations:

Relationship to Other Applicable Law:

- **Land Use Planning:** The provincial licensing process does not remove the requirement to comply with the zoning by-law and other municipal planning documents. The definitions within the municipality's Official Plan and Zoning By-law are applicable to all retail, including cannabis retail stores. Retail sale of cannabis from a provincially licensed store is legal and is a permitted use in the retail zones.
- **Municipal Building Inspections:** while the licencing of the store operation is the responsibility of the AGCO, the Building Code applies to cannabis retail store locations. Therefore, where a building permit is required, the building inspector will undertake duties as usual. Fire Code compliance is also mandatory.

For the purposes of this policy statement, a cannabis retail store shall mean a store licenced by the AGCO.

1. Cannabis Retail Stores and Sensitive activities:

In order to help ensure public health and safety, protect youth and reduce illegal sales, retail cannabis stores are discouraged where nearby properties are designed to serve youth including

The policy can address types of activities where youth or the potential for illegal sales or health risk exist. Please note that Ontario Regulation restricts a cannabis retail store from being located within a distance of 150 meters of a public school or most private schools. The municipality cannot adopt a greater distance. The distance buffer would be measured from the property line, if the school is the primary or only occupant of a building; or the boundary of any space occupied by the school within the building, if the school shares space, like in a mall. This distance buffer would not apply to private schools that hold classes online only, or to First Nation schools located on reserve.

The municipal government may want to suggest other youth facilities such as libraries and community centres if appropriate, or other sensitive facilities that serve persons with mental health or addiction challenges.

The policies cannot be so restrictive that it is impossible to locate a store. Nor can the policy state a specific number of stores permitted.

It is recommended that should the municipal government choose a separation distance from a sensitive use that it be a number, not a range and that a rationale for this distance be provided.

Municipal governments should note that municipal density restrictions on cannabis retail stores are not permitted under the legislation or regulations. However, it is possible that the number of cannabis retail stores in one area could in the future be considered under the public interest criteria in the regulations and merit comment from the municipal government and community.

2. Cannabis retail stores should not be permitted in:

Any prohibitive statements must be considered through the lens of eliminating illegal activity, public health and safety or protecting youth and the regulatory definition of the public interest.

Retail locations, if retail is allowed in a zone other than a commercial zone, such concerns may be noted.

How does this prohibition help youth, create a safer environment or limit illegal activity? A municipal government may choose not to have any prohibitions.

3. Attached is a map showing the retail/commercial zones of the municipality and the activities identified in Section 1 above.

A map showing where retail is permitted and the locations of the activities identified in the first section will be very helpful to the AGCO. Municipal governments may choose to provide some sample separation distances as concentric rings around the activities such as addiction treatment facilities etc. to provide sample set backs. The Ministry of Education is working to identify all schools however; municipalities could also provide this information.