**June 2026**

Dear Minister,

I am writing as the owner of an independent licensed cannabis retail store in Winnipeg regarding recent public discussion surrounding potential regulatory changes following the violent assault that occurred at a Winnipeg cannabis retailer.

First and foremost, I want to acknowledge the seriousness of the incident. No employee should ever be subjected to violence in the workplace. The assault was disturbing, unacceptable, and deserving of a meaningful response.

However, I am concerned that current discussions are moving toward blanket regulatory requirements that may significantly increase costs for compliant businesses without addressing the underlying causes of violent crime.

Recent public commentary has included calls for mandatory two-person staffing requirements, controlled-access entrances, and vestibule requirements similar to those found at Manitoba Liquor Mart locations.

While these proposals may appear reasonable at first glance, they would have substantial consequences for independent cannabis retailers throughout Manitoba.

The operational reality for many independent retailers is very different from that of large multi-store chains.

My store is open 65 hours per week. To manage labour costs responsibly, we schedule employees in five-hour shifts whenever possible. This allows us to avoid mandatory meal-break overlaps that occur when longer shifts are scheduled.

For a small independent retailer, payroll efficiency is often the difference between profitability and loss. Extending shifts beyond five hours frequently requires additional staffing overlap, increasing labour costs without increasing sales.

As a result, many independent retailers already operate with extremely lean staffing models. These decisions are not made to maximize profits. They are made to remain viable in a highly competitive and heavily regulated industry.

Unlike large corporate chains, independent cannabis retailers often remain viable only because owners personally work extensive hours within their businesses. In my own case, I regularly work between 55 and 65 hours per week, including evenings and weekends, in order to control labour costs and keep the business financially sustainable.

Many independent cannabis retailers are simultaneously acting as manager, purchaser, compliance officer, inventory specialist, marketer, bookkeeper, security monitor, and frontline sales associate. Owners are effectively subsidizing the operation of their businesses through their own labour.

A mandatory two-person staffing requirement would fundamentally change this business model.

For my business, the additional cost would be approximately $40,000 annually.

For retailers operating extended hours, including stores open from 8:00 a.m. until midnight six days per week, the additional annual labour cost could exceed $100,000 once wages, vacation pay, statutory holidays, Workers Compensation premiums, CPP, EI, and other employer costs are included.

These costs would be imposed regardless of customer traffic, sales volume, neighbourhood crime levels, location, profitability, or previous safety record.

If government determines that mandatory two-person staffing is necessary as a public safety measure, then government should also provide wage subsidies, payroll tax relief, security grants, or other financial assistance to offset the costs imposed on small businesses.

The Province of Manitoba has already recognized through the Manitoba Security Rebate Program that crime prevention is a shared responsibility between government and business.

The program exists because government recognizes that businesses should not be expected to bear the entire cost of responding to criminal activity. Manitoba currently assists businesses with security cameras, alarm systems, lighting, and other crime-prevention measures.

This principle is important.

If government determines that additional security measures are necessary for cannabis retailers, whether through mandatory staffing levels, controlled-access systems, vestibules, panic alarms, or other requirements, then government should similarly recognize that independent businesses cannot reasonably absorb those costs alone.

The Manitoba Security Rebate Program currently provides up to $2,500 per location. While helpful, that amount represents only a small fraction of the approximately $40,000 annual cost that a mandatory second employee would impose on my business.

A public safety problem should not become an unfunded mandate imposed exclusively on independent retailers.

The current discussion also appears to assume that every cannabis retailer faces the same level of risk.

That is demonstrably untrue.

My store operates on Academy Road in River Heights, one of Winnipeg's most established and lowest-crime retail corridors. Other stores operate in areas facing significantly different challenges. A risk-based approach is far more appropriate than a blanket province-wide mandate that treats all locations as identical.

Cannabis retailers are already among the most heavily regulated retail businesses in Manitoba. Licensed stores operate under extensive requirements involving surveillance systems, alarm systems, age verification, secure product storage, inventory controls, employee training, and regulatory inspections.

Following a Workplace Safety and Health inspection at my store earlier this year, the issues identified primarily related to policy documentation, orientation materials, violence prevention procedures, and working-alone procedures. The inspection did not identify significant physical security deficiencies.

This highlights an important reality.

Regulatory compliance and paperwork requirements have value, but they do not stop violent offenders from committing crimes.

The recent assault should not be viewed solely as a cannabis retail issue. It should be viewed as a broader public safety issue.

The underlying causes of workplace violence are not unique to cannabis retailers. They involve repeat violent offenders, policing resources, criminal justice policy, community safety, and broader social issues that affect many sectors of the economy.

If Manitoba adopts the position that employees should never work alone because violence may occur, then that principle extends far beyond cannabis retail.

Many occupations regularly involve individuals working alone, including convenience stores, gas stations, fast food restaurants, pharmacies, hotels, taxi drivers, rideshare drivers, letter carriers, courier and delivery drivers, security guards, home care workers, retail stores, cell phone stores, jewellery stores, hair salons, nail salons, massage therapy clinics, dry cleaners, small grocery stores, and liquor vendors.

If a mandatory second employee would have prevented this incident, then government should explain why similar staffing requirements are not being proposed for convenience stores, gas stations, pharmacies, hotels, taxis, rideshare drivers, and numerous other occupations where employees routinely work alone.

I am also concerned about discussions surrounding the reintroduction of vestibules and controlled-access entrance systems.

Many cannabis retailers, including my own, were designed, leased, financed, and constructed based on the regulatory framework in place at the time of approval. The removal of vestibule requirements influenced construction decisions, leasehold improvements, and capital investments across the industry.

Requiring businesses to retrofit existing locations years later would create significant financial burdens and operational challenges.

If such changes are being considered, there should be a full consultation process, impact assessment, and financial assistance program before implementation.

Government should also consider the cumulative impact of new regulatory costs alongside continued licence issuance in a mature cannabis market.

Overall cannabis sales are no longer experiencing the rapid growth seen following legalization. In many markets, sales have stabilized while the number of retail locations continues to increase.

When additional licences are introduced into a market with relatively flat demand, existing sales are redistributed among a larger number of retailers rather than creating significant new economic activity.

At the same time, independent retailers must compete with large multi-store operators possessing substantially greater financial resources and economies of scale.

Policy changes involving additional staffing costs, security retrofits, construction requirements, or compliance obligations can be absorbed much more easily by organizations operating dozens of locations than by independent retailers operating a single store.

Whether intentional or not, the practical effect of increasing compliance costs, continued licence issuance, and new operating requirements may be increased industry consolidation, reduced local ownership, and greater concentration of market share among large corporate retailers.

That outcome would not necessarily improve worker safety, but it would reduce competition, local ownership, and consumer choice within Manitoba's cannabis sector.

In my view, the recent assault demonstrates a public safety failure rather than a cannabis retail compliance failure.

A more effective response would include:

A risk-based approach rather than blanket province-wide mandates.

Meaningful consultation with independent retailers before regulatory changes are introduced.

Government-funded security grants for cameras, alarms, panic buttons, lighting, and related security improvements.

Recognition that owner-operators should be permitted to work alone in their own businesses.

Working-alone procedures that comply with workplace safety legislation without imposing mandatory two-person staffing requirements.

Enhanced police resources and targeted enforcement against repeat violent offenders.

Continued examination of criminal justice and bail policies that impact community safety.

A review of whether continued licence issuance in mature markets serves the public interest.

Independent cannabis retailers support worker safety. We support reasonable regulation. We support meaningful measures that improve safety for employees and the public.

What we do not support are reactionary policies that impose substantial costs on compliant businesses while failing to address the underlying causes of violent crime.

I respectfully request that independent retailers be directly consulted before any staffing, security, vestibule, or controlled-access requirements are introduced.

Thank you for your consideration.