As sent by email:
From: Tom Doran
Sent: Saturday, October 17, 2026 8:52 PM
To: Premier Kinew; copies to the Ministers of Justice, Municipal and Northern Relations, Labour, Finance and Education, and to Manitoba news organizations.
Subject: Formal Submission on Bill 56 – Independent Cannabis Retailer Concerns

Dear Premier Kinew and Ministers:

I am the owner of Jupiter Cannabis at 580 Academy Road in Winnipeg and a board member of Academy Road Biz. Bill 56 has passed third reading and is expected to receive Royal Assent. The bill itself contains no staffing numbers or hours. It only grants the LGCA the power to set minimum staffing by regulation. I am writing to put on the record, before any regulation is drafted, the specific conditions that must apply if that power is used. What you introduced is not a safety bill. It is a targeted attack on independent cannabis retailers that will potentially cause significant financial hardship that could lead to the closure of some independent cannabis stores, including my own, while protecting the interests of the union that represents only The Joint and Value Buds.

No one disputes that the assault at Smoke City on 5 May 2026 was serious. What is disputed is that the correct response is a cannabis-only minimum-staffing rule written after consultation with UFCW Local 832 and Marie Buchan, and after zero contact with the independent stores that make up the large majority of the roughly 249 licensed locations. I received no outreach. The only reply I ever got was a template letter. A poster for the cannabis union was hung on a pole outside my store. Social media posts invited workers to contact the union with no public verification that the respondents even worked in cannabis retail. The Joint and Value Buds together are a small fraction of the stores. Independent operators were left out on purpose.

I wrote to the Minister of Labour and Immigration, the Minister of Justice, the Minister responsible for Manitoba Liquor and Lotteries, and the Premier in June 2026 specifically raising the risk of blanket staffing and security rules being imposed on independent cannabis retailers without consultation. In that letter I stated that independent stores operate on thin margins, that a mandatory two-person requirement would add approximately $40,000 in annual labour costs, that owner-operators must be allowed to work alone in their own businesses, and that any rules must be risk-based and limited to higher-risk evening hours. I asked that independent retailers be directly consulted before any such requirements were introduced. The only response I received was a templated reply from a deputy minister. No one from the government contacted me, or any other independent store I am aware of, before Bill 56 was introduced. The consultation that was promised never occurred.

On 10 April 2026 a Workplace Safety and Health officer came to my store in River Heights, where I am the owner-operator and there had been no robberies or violent incidents in five years, and issued an improvement order on working-alone procedures. River Heights is a safer residential area than the location of the Smoke City assault. The improvement order was closed on 23 April 2026 after we formalized the procedures we already had in place. One month later the assault happened at Smoke City. I demand the exact number of cannabis stores in Manitoba that Workplace Safety and Health visited in 2025 and 2026, the date of each visit, the list of every improvement order or other order issued against those stores, and the compliance status of each order. I want to know, on the record, whether Smoke City received a comparable inspection before 5 May 2026. If it did not, explain why my store was selected and Smoke City was not. I also demand to know whether Smoke City received any Workplace Safety and Health inspection or follow-up after the 5 May 2026 assault, the date of any such visit, and the outcome. Formal applications under The Freedom of Information and Protection of Privacy Act requesting the complete inspection statistics, the selection criteria, the full list of visits and orders, the answer to the pre-assault Smoke City question, and the post-assault inspection records for Smoke City will be filed after this letter is sent. Before any staffing regulation is considered, every cannabis store in Manitoba must be visited by Workplace Safety and Health and required to formalize the same working-alone procedures that my store already had in place and that were confirmed closed on 23 April 2026. There are not 249 stores that have gone through that process. That is the starting point.

It is our understanding, based on recent conversations, that only six of twelve commercial LGCA inspectors were available for duty approximately two months ago. If that understanding is incorrect we apologize, but the scale of the mandate is not in dispute. The LGCA’s 2024/25 Annual Report lists 1,901 active liquor service licences, 469 liquor retail licences, approximately 230 cannabis retail stores (later rising to roughly 249), 949 lottery ticket retailers, 428 VLT siteholders, and 34 manufacturer licences, for a total of more than 4,000 commercial locations under the Act. Service inspections alone numbered 7,380 that year. The LGCA is doing good work under difficult conditions. Its inspectors operate on a risk-based model and the industry has generally been compliant. Adding mandatory staffing rules under Bill 56 will increase their workload without any announced increase in resources. Thirty-five to fifty commercial inspectors would be required to maintain consistent, orderly coverage across the existing licence base. We demand a written account from the Minister responsible for Manitoba Liquor and Lotteries of the current number of active commercial inspectors, the steps being taken to hire and train additional inspectors, any analysis of whether absences are related to stress or overwork,

and a complete list of every inspection conducted at every cannabis retail store in Manitoba from 17 October 2018 to 17 October 2026. The existing Act already generates more compliance work than the current complement can complete. Formal applications under The Freedom of Information and Protection of Privacy Act will request the staffing records, any internal capacity or workload analyses, and the full inspection list and will be filed after this letter is sent. Any staffing regulation under the new power should not be implemented until the government demonstrates that the LGCA has the resources to enforce both the existing Act and any new rules. The same government that has been unable to resolve safety concerns that led the Manitoba Nurses Union to grey-list four hospitals should not add further unfunded mandates to an already stretched regulator. Minister Simard is responsible for this file. The failure to resource the LGCA adequately is a management failure, not an inspector failure.

The LGCA has publicly described its compliance model as risk-based. That model must govern any staffing regulation. A store in one of the most affluent areas of the city that has had no robberies or violent incidents in five years, and that is owner-operated, must not be treated the same as a location with a documented history of violence. Any multi-person requirement must be limited to hours after 9:00 p.m., must be area-specific based on actual crime statistics, and must expressly exempt owner-operators who choose to work alone in their own businesses. Existing Workplace Safety and Health working-alone procedures must remain available. These conditions are consistent with the risk-based approach the LGCA already uses.

Jeff Traeger is President of UFCW Local 832 and simultaneously Chair of the Manitoba Liquor and Lotteries Board of Directors. That dual role is untenable. As Chair he receives board packages and management reports that contain cannabis retailer-level sales volumes, ordering data, and market performance for every licensed cannabis store in the province, including independent stores that have never been organized by his union and that generate negligible dues. A minimum-staffing regulation that forces a second worker adds approximately $40,000 in fixed annual labour cost to a store the size of mine. Covering statutory meal breaks without locking the door requires a third person and pushes the incremental cost toward $80,000. That figure is the difference between remaining open and closing. Traeger is in a position to see exactly how thin those margins already are. No other major province places the sitting president of a private-sector union that is actively advocating cannabis-specific staffing rules in the chair of the Crown corporation that controls distribution and holds the sales data. Alberta’s AGLC board consists of independent appointees. Ontario’s AGCO and LCBO boards consist of business and professional members. Saskatchewan and British Columbia do not do this. The appearance of conflict is obvious and has never been examined. We require the following immediately: production of

all records concerning Traeger's appointment as Chair and any measures considered to address the dual role; all board packages and management reports containing cannabis retailer-level sales volumes or ordering data provided to the Chair from 1 January 2024 to the present; all conflict-of-interest declarations, recusals, and information-barrier policies applicable to the Chair in the same period; and all emails and briefing materials between the named ministers or their staff and Jeff Traeger or Marie Buchan concerning cannabis store staffing or Bill 56. Formal applications under The Freedom of Information and Protection of Privacy Act for each of those categories will be filed after this letter is sent. You will produce the records or explain under oath why they do not exist.

The working-alone and staffing provisions of Bill 56 rest on consultation with UFCW Local 832 and on surveys of workers at The Joint and Value Buds. Those stores represent a small fraction of the roughly 249 licensed locations. Independent stores were not included. Jeff Traeger, President of UFCW Local 832, is simultaneously Chair of the Manitoba Liquor and Lotteries Board. Marie Buchan has been the public face of the union's advocacy on this file. We demand production of every submission, survey response, and consultation record relied upon to justify the cannabis-only staffing rule, together with the method used to verify that the respondents were in fact cannabis retail workers. Those records must be examined by the independent panel. A rule that increases fixed costs for the large majority of stores cannot be written on the basis of unverified input from a minority of unionized locations.

Bill 56 leaves every other retail and hospitality workplace under existing rules only. On 15 October 2026 Winnipeg police reported 123 arrests and more than 243 charges from their Fall Retail Theft Initiative at more than 30 locations, plus another 81 arrests outside the initiative. Retail theft and related disorder happen in grocery stores, convenience stores, restaurants, and shopping centres where one person is routinely working alone in the evening. Groups of two or more walk in and take what they want. A cannabis-only rule does not fix that. It simply tells anyone looking for an easier target to go somewhere else. In the last week alone there have been multiple serious incidents involving taxi drivers who work alone: a Unicity cab driver robbed early on 17 October on Main Street, a 16-year-old charged with stabbing a taxi driver on 25 September near Kildonan Place, a driver attacked with a hammer on 3 October and found unconscious, and a 45-year-old woman charged after allegedly pulling a firearm on a cab driver on 11 October. There has been no announcement of legislation to protect cab drivers who work alone. Bill 56 does nothing for them. It does nothing for the Subway worker across from Fiddler's Green who stays open until 4:00 a.m. It does nothing for the broader rise in violence in hospitals, schools, and retail. Manitoba has become more violent under this government. High-risk offenders continue to be released. Promises to appear remain available for violent offences.

Police capacity has not kept pace. Bill 56 is not a response to that. It is a narrow measure that increases fixed costs for independent cannabis stores while the larger failures continue.

The staffing and working-alone provisions that Bill 56 now authorizes must not be implemented as drafted. Any regulations or replacement framework must apply to all people who work alone across retail, hospitality, and every other sector. A cannabis-only rule leaves Subway workers, restaurant staff, convenience store employees, postal workers, and every other lone worker under existing regulations only. It creates a displacement incentive for anyone seeking an easier target. The government must conduct a full consultation with all affected sectors and introduce one evidence-based framework that protects every person required to work alone.

The Manitoba Nurses Union has grey-listed four hospitals over safety and staffing concerns: Health Sciences Centre (August 2025), Thompson General Hospital (November 2025), St. Boniface Hospital (February 2026), and Seven Oaks General Hospital (formally enacted 16 October 2026 after a 98 percent vote). Grey-listing is a union tactic that discourages nurses from accepting shifts until conditions improve. Nurses work in teams. Hospitals have dozens or hundreds of staff and patients present in the same areas. Assaults on nurses, doctors, and security still occur in front of large numbers of people. The presence of many workers has not eliminated violence. Bill 56 rests on the assumption that adding one or two additional staff in a cannabis store will meaningfully reduce the risk of assault. The hospital record shows that large numbers of people do not prevent assaults. If the government’s theory is that more bodies equal safety, the grey-listing of four major hospitals demonstrates that the theory does not hold where it is tested every day. Cannabis stores should not be singled out for a staffing mandate while the same government has been unable to resolve safety concerns in hospitals that already operate with far higher staffing density. Any replacement framework must be evidence-based and applied consistently across workplaces, not limited to cannabis retail.

The same question must be put to UFCW Local 832. If working alone and workplace security were the dominant concerns of the unionized cannabis retail workers at The Joint and Value Buds, as Jeff Traeger and Marie Buchan have stated publicly, why did the union not offer those workers the opportunity to grey-list the highest-risk locations so they could decline shifts at those stores? Grey-listing is a recognized tool used by the Manitoba Nurses Union, which has grey-listed Health Sciences Centre, Thompson General Hospital, St. Boniface Hospital, and Seven Oaks General Hospital over safety concerns. If the risk of workplace violence from customers is serious enough to justify new legislation that will raise fixed costs for the large majority of non-union stores, the union

that represents only The Joint and Value Buds should have given its own members that option immediately. We demand a written explanation of why grey-listing was not offered and whether any internal discussion of that option occurred.

The same pattern appears in schools. The Manitoba Government and General Employees' Union reported on 16 October 2026 that student-related aggression incidents against Winnipeg School Division support staff rose 118%, from 884 in 2022–23 to 1,925 in 2025–26. Educational assistants accounted for nearly every incident. Hitting, kicking, biting, and scratching have become routine. Nurses have grey-listed four hospitals over safety. Educational assistants are documenting a sharp rise in violence. Cannabis retail workers at two chains are being used to justify cannabis-only staffing rules. Across these workplaces the government has not produced a consistent, adequately resourced response. Instead it has advanced a narrow bill that increases fixed costs for independent cannabis stores while the broader problems of workplace violence, inspector capacity, and the release of high-risk offenders into the community continue. Minister Simard and the government are responsible for the management of this file. Adding unfunded mandates to the LGCA while leaving larger safety failures unaddressed is not a solution.

Keith Horn of the Retail Cannabis Council of Manitoba has noted that fixed hours of mandatory multi-person coverage would effectively publish a schedule. Anyone intent on causing harm could simply avoid those hours or arrive immediately before or after. That observation is correct. It is also the precise argument the government and UFCW Local 832 will use to claim that only continuous three-person coverage can close the gap. The practical result for an independent store is an additional $80,000 in annual labour cost. The same logic exposes the larger failure of Bill 56. On Sherbrook Street, Fiddler's Green Cannabis is open as late as midnight on some nights. Directly across the street, a Subway remains open until 4:00 a.m. in a high-crime area that experiences repeated vandalism and break-ins. Bill 56 may require additional staff at the cannabis store until it closes. It leaves the Subway worker alone until 4:00 a.m. with no equivalent protection. This is not worker safety. It is a cannabis-only rule that leaves every other lone worker in the same neighbourhood exposed.

Minister Wiebe stated publicly that children should not be able to ride past cannabis stores and see products that are not appropriate for them. The same children can walk through Garden City Save-On or Grant Park Mall and see alcohol products on full display through the open glass of MBLL Liquor Marts. Alcohol is legal at 18. Cannabis is legal at 19. No explanation has been offered for the difference. The existing window coverings were required precisely so that people outside the store, including minors, could not see cannabis products on

the shelves. Removing that requirement without specifying how stores are to prevent visibility creates an immediate problem. At Jupiter Cannabis, the removal of the coverings near the entrance would allow a child standing outside the door to look in at an angle and see products on display. Building a vestibule or covering the fronts of the showcases is not a viable option. It would reduce sales and is not required of liquor retail. The bill provides no workable method for stores to meet the stated goal of keeping products out of public view while removing the coverings. This omission alone is sufficient reason not to implement the window-covering removal as drafted and to require clear, practical requirements that apply consistently or not at all.

The only workable alternative is a risk-based approach. An at-risk time is after 9:00 p.m., and it is area-specific based on actual crime statistics, not a province-wide blanket. Stores that have already had violence should face mandatory additional measures. Owner-operators must be allowed to work alone in their own businesses at any time. Existing Workplace Safety and Health working-alone procedures should remain available. Government-funded security grants should be offered.

A common-sense measure that would address a substantial portion of the risk this bill claims to target is a reduction of cannabis store closing times from midnight to 9:00 p.m. across Manitoba. The assault at Smoke City occurred in the evening. Many of the incidents cited in support of this bill have taken place in the evening hours. Limiting hours of operation from the current midnight closing time to 9:00 p.m. would remove the later portion of the evening when risk is elevated without imposing new fixed labour costs on every independent store. This option was never placed on the table. UFCW Local 832 has not explained why a reduction in closing time is not a viable response, either on its own or in combination with existing working-alone procedures. The most obvious explanation is that shorter hours would mean fewer shifts for the unionized workers at The Joint and Value Buds and therefore fewer dues. We demand a written response from UFCW Local 832 and from the ministers who consulted them explaining why a reduction from midnight to 9:00 p.m. was rejected and why it cannot form part of any risk-based framework.

One alternative that was never discussed is a controlled-entry system after 9:00 p.m.: a buzzer, a camera that photographs the customer’s ID, and entry into a shared database of the kind already used by nightclubs in Winnipeg. Problematic customers can be flagged so other stores and, where appropriate, liquor and gaming or police have the information. Most people will not create problems if they know their ID has been recorded before they enter. A variant of this model exists in at least one Manitoba cannabis location; that store does not have access to any shared database. This model exists in some Alberta liquor stores. It was

never put on the table because you never consulted the people who would have to live with it.

Owner-operators are not workers under The Workplace Safety and Health Act. The Act defines a worker as a person employed by an employer or engaged under conditions of economic dependence that more closely resemble an employee than an independent contractor. A self-employed owner who owns the business, assumes the full financial risk, and controls the operation does not meet that definition and is not eligible for Employment Insurance if the store closes or the owner cannot work. We demand that any legislation or regulation expressly state that an owner-operator may work alone in their own store at any time as a conscious choice, and that no minimum-staffing rule applies to the owner themselves. We reserve the right to seek judicial review of any regulation made under the new power after Bill 56 receives Royal Assent and after the government has responded to the questions raised in this letter. We will also file applications under The Freedom of Information and Protection of Privacy Act and will challenge any regulation that treats owner-operators as workers under The Workplace Safety and Health Act.

If minimum staffing requirements are implemented under the new power in Bill 56, we request a direct subsidy to independent cannabis retailers sufficient to cover between 8 and 16 hours of labour per day. That subsidy should be funded from the existing 13 percent wholesale markup that Manitoba Liquor and Lotteries applies to cannabis products. The markup was increased to 13 percent on 1 June 2026. Revenue from that markup is already remitted to the province. Directing a portion of it to offset new staffing costs is a reasonable allocation of funds generated by the stores themselves. An additional consideration is that these subsidies could be paid for if the government applied provincial retail sales tax to cannabis as Manitobans currently pay only GST on these products.

I expect a written response that addresses every point, including the age disparity, the window-covering double standard with liquor, the break-coverage cost, the controlled-entry alternative, the nurses grey-listing parallel, the LGCA inspector capacity issue, and confirmation that any staffing regulation under the new power will be risk-based, limited to higher-risk evening hours, and will expressly exempt owner-operators. This is not a request for further delay. It is a demand that you stop using a narrow consultation with a union whose president chairs the board that holds our sales data to write rules that will close independent stores. Manitoba has become more violent in communities, hospitals, schools, and retail environments. The government has failed to protect citizens. High-risk offenders continue to be released. Promises to appear remain available for violent offences. Police capacity has not kept pace. Bill 56 does not address any of that. It is not a serious response.

I request a detailed written response from each of the named ministers that addresses every concern raised in this letter. A templated reply from a deputy minister is not an adequate response.

Let us talk soon.

Tom Doran - Founder
Jupiter Cannabis
Unit C, 580 Academy Road
Winnipeg, MB, R3N 0E3