

BARBADOS MEDICINAL CANNABIS LICENSING AUTHORITY

SECURITY GUIDE

Let's Grow Together



The Barbados Medicinal Cannabis Industry Act, 2019, (the Act) establishes that an application for a license must be filed with the regulatory body, the Barbados Medicinal Cannabis Licensing Authority (BMCLA), in the form and manner specified by the Act and the Barbados Medicinal Cannabis Industry Regulations, 2020 (the Regulations) and must include all the information required.

This Security Guide provides general terms and conditions for the security of the medicinal cannabis industry. This Guide should be read in conjunction with the Act, the Regulations and the General License Guide. This Security Guide is intended to supplement the provisions of the Regulations.

It is the responsibility of the applicant to ensure that he/she is familiar with this Guide and the Regulations. Your application may be denied, or your operations delayed if you fail to meet the requirements outlined.

The BMCLA is committed to protecting personal information as well as confidential business information that is under its possession. Ensuring the confidentiality, integrity, and availability of information is essential to the regulator's decision making and the delivery of services. The BMCLA recognizes that the protection of this information is an essential element in maintaining public trust.

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Disclaimer

This document is a living document, which may be updated and changed by the BMCLA as it sees fit. Users are advised to ensure they are using the most recent version.

In the case of any discrepancies between this document and the Act and the Regulations, please seek direction from the BMCLA.

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FOREWORD

The Barbados Medicinal Cannabis Industry Act, 2019 (the Act) was proclaimed on September 30, 2020. It establishes the conditions under which the Medicinal Cannabis Industry in Barbados will operate. Provisions for the licensing regime, patient access to medicinal cannabis and the establishment of the regulating Authority, the Barbados Medicinal Cannabis Licensing Authority (herein referred to as the BMCLA) and its Board are all found within the Act. Further, the Act is supported by the Barbados Medicinal Cannabis Industry Regulations, 2020 (the Regulations).

This guidance document should be read with reference to both the Act and the Regulations. The intent is to provide further direction to the applicant based on the provisions established in the aforementioned documents. It also sets out the rules and regulations for the compliance and safety of the industry.

Section 4 (1) of the Act provides for the BMCLA to develop policies, procedures and guidelines for the industry. Additionally, section 4 (2) of the Regulations also provides the BMCLA with the right to request any additional information that pertains to the licensee, its agents or directors and that is necessary to consider the application. It is the responsibility of all applicants to make sure that they are aware of all rules, regulations and policies which pertain to their application and operations.

The BMCLA is not responsible for any circumstance in which an applicant or licensee might find themselves non-compliant due to lack of awareness of the necessary requirements.

This document, while aimed at being comprehensive, may not contain every answer an individual may need. In those cases, it is suggested that the applicants contact the BMCLA at clo@bmcla.bb or visit the BMCLA's website www.bmcla.bb.

The overall intent of the regulatory framework, including all guidelines governing the Barbados Medicinal Cannabis Industry, is to ensure patient safety and the administration of an orderly and efficient industry.



GLOSSARY

Delay: Delay is the act of making a breach of security measures more difficult, or slower, which provides time for defence or leading to the intrusion to be abandoned.

Deny: Deny is the measures taken that allow some people access while decline access to others.

Defend: Defend is action/s taken to respond to a security breach.

Deter: Deter is to discourage a person/s from attempting to breach the security measures.

Detect: Detect is to discover or notice any security breached.

Diversion: Diversion is a medical and legal concept involving the transfer of any legally prescribed controlled substance from the individual for whom it was prescribed to another person for any illicit use.

Inversion: Inversion is a reversal of position, order, form, or relationship or use of the product on the compound or in the area where it is being produced or processed.

Redundancy: Redundancy is the inclusion of extra components which are not strictly necessary to function, in case of failure in other components.

Security Master Plan: A Security Master Plan is a document that delineates the organisation's security philosophies, strategies, goals, programmes, and processes. It also provides an outline of the risks and the mitigation plans for the organisation in a way that creates a five-year business plan.

Security Plan: A security plan specifies the approach, responsibilities and resources applied to managing protective security risks. The security plan allows entities to review the degree of security risk that exists in different areas of operations and take action to mitigate identified risks.

PURPOSE

The purpose of this document is to provide security guidelines to assist applicants and license holders to understand and comply with the physical security requirements for conducting authorized activities within the Medicinal Cannabis industry.

The purpose of the security plan and security master plan as advised in the Regulations is to prevent unauthorized inversion and diversion of cannabis products and protect the health, safety and welfare of workers and the general public.

These security guidelines should provide clear and specific instruction for adherence to the security requirements of the industry.



BACKGROUND

The Barbados Medicinal Cannabis Industry Act, 2019 (the Act) and the Barbados Medicinal Cannabis Industry Regulations, 2020 (the Regulations) provide, among other things, the framework for legal access to medicinal cannabis, control and regulation of medicinal cannabis use and commercial engagement in Barbados. It in no way makes legal the use in the production, manufacturing and handling of cultivation or production of cannabis for any purpose other than that as stated under the Act. The Act lays out the allowance under which persons can engage in medicinal cannabis within the jurisdiction of the Barbados Government.

The Act speaks to the establishment of the Barbados Medicinal Cannabis Licensing Authority (BMCLA), the allowance for the use of cannabis for medicinal purposes, which must be prescribed by a doctor and dispensed by a licensed pharmacist (as defined under the Pharmacy Act, Cap. 372D). The Act also makes provision for the establishment, licensing, regulation, monitoring, control and enforcement of the medicinal cannabis industry by the BMCLA. It established eight (8) different types of licenses and tiers and gives the BMCLA the right and responsibility for the importation, cultivation, processing, exportation, transportation, analyzing as well as research and development of cannabis for medicinal purposes.

Under this framework, a person is required to obtain a license issued by the BMCLA in order to conduct various activities with cannabis. Applicants and license holders are responsible for compliance with the Act and the Regulations as well as compliance with other applicable laws as made by the Government of Barbados.

The Act establishes that an application for a license must be submitted to the BMCLA in the form and manner specified by the Regulations and must include all requested information and supplemental documentation as requested. This guide sets out the application process including the form and manner for submitting an application and the information that is required.

The BMCLA will publish other guidance documents and information as needed on its website (www.bmcla.bb) that may be used in conjunction with this document to assist applicants in preparing their applications. In order to maintain consistency and transparency, this guide, as well as other guidance documents and information, will be updated, as required, to reflect changes to policies and/or operations.

GENERAL REQUIREMENTS

1. Security Plan - Applicant

1.1. Section 5 (1) C of the Regulations indicates that applicants must submit a security plan.

In respect of the security plan the applicant must note the following:

- The security plan should provide a general overview of how the applicant intends to secure their operations with respect to the category of license for which the applicant is applying.
- We understand that at this stage the applicant is stating what they intend to do which may change if they are issued with a license and the operation is established.

1.2. The security plan should provide information on what the applicant intends to implement in the following areas:

- Physical security barriers/measures (e.g. site perimeter fencing/gates, building perimeter walls/roof/doors, building interior walls/ceilings/doors, door/gate locks, etc.);
- Technological security measures (e.g. visual recording system, intrusion alarm system, electronic access control system, panic alarms, exterior security lighting (including steps taken to avoid light pollution) back-up/emergency power supply, cybersecurity measures, etc.);
- Procedural security measures (e.g. security procedures Standard Operating Procedures or SOPs) on applicable subjects such as 24-hour on and off-site video monitoring, intrusion alarm monitoring and response, security reporting protocols, visitor management, video retention guideline, shipping and receiving protocols, response to loss or theft of cannabis, initial and periodic security risk assessments, etc.);
- Personnel security measures (e.g. establishment of and training in SOPs (etc.).



- Security management (e.g. identification of the individual responsible for managing the security function at the site, security management chart showing the lines of responsibility, reporting and a brief description of the responsibilities of the individual responsible for security.
- The submission of the security plan should also include an aerial image of the site (e.g. via Google Earth or similar) or area survey document must be provided showing that there are no schools or public areas within a 600 meters radius of the proposed site and building(s).

2. Security Master Plan - Licensee

2.1. In accordance with Regulation 16 C and 17, each licensee, as a term and condition of their license, must develop and maintain a security master plan. The security master plan must be presented upon request to the BMCLA's inspectors.

Whereas the security plan can be general in nature, the security master plan must provide specific details in all the areas identified below:

(At this point, the applicant has been granted a license and therefore should be able to speak more definitely to the parameters of the operations.)

- The Site and Building Security Diagram
 The security master plan must include a site and building
 security diagram. The site and building diagram must include:
 - The demarcation of the site and building perimeter;
 - The site perimeter technology and physical security controls (e.g. fencing, gates, locks, lighting units, cameras, alarm devices, etc.);
 - The building perimeter technological and physical security door controls (e.g. door locks, door alarm contact sensors, motion detectors, electronic access control devices, lighting units, etc.,);
 - The interior premises technological and physical security controls (e.g. door locks, door contact alarm sensors, motion detectors, cameras, electronic access control devices, panic alarms, security equipment locations, etc.);
 - Accurately display the physical and the technological security devices/elements at the site and building(s) and remain up to date to reflect any additions and/or changes.



3. Physical Security Barrier

The guidelines below apply to persons who are pre-approved for a license or have a licensed operation.

While these elements should be contained in your security master plan, they also represent the requirements that the BMCLA's Inspectors will use to undertake assessments of your property.

3.1. The following requirements must be met with respect to the physical security barriers/measures at the site perimeter and premises:

- The site perimeter barrier(s) (e.g., fencing/gates) and building perimeter barrier(s) (e.g. walls, roof, doors, windows) must be of adequate construction and physical resilience to deter potential infiltrators and resist/prevent attempts to gain unauthorized access.
- The fencing height under the Town Planning Department Regulations is 4ft in the front and maximum of 7ft at the perimeter. The licensee must apply for approval of a perimeter over 7ft to the Town and Country Planning Department. This approval must be submitted to the BMCLA prior to the approval of the license.
- In most cases, an adequate perimeter barrier requires two layers of fencing, one on the outer layer and an inner layer.
- The perimeter fencing material must be suitable for making the perimeter totally secure by the licensee and blends with the terrain. It cannot be made from:
 - Plants or bush creating a hedge;
 - Tarpaulins;
 - Privacy netting;
 - Dust guard fencing;
 - Woven or non-woven polyethylene plastic bags;
 - or similar material
- There should be no shrubbery immediately against fences.
- No large objects should be stored near fences or access points.
- Measures to prevent entry into buildings or the site from above or below (e.g. tunnelling), should be applied.

- Physical security barriers should be sufficient to obstruct the view of cannabis plants from outside of the perimeter.
- All doors, door frames and door locking hardware on entry/exit points on the building perimeter and in rooms/areas where activities with cannabis will be conducted must be of commercial-grade, non-residential standard.
- All areas/rooms where activities with cannabis are conducted must always remain secured (see access control section) to protect against unauthorized access.
- The secure storage area must be equipped with an additional layer of physical reinforcement to protect against forced entry.
- Windows are not permitted in areas/rooms where activities with cannabis are conducted (except for small indoor observation windows for safety purposes – 12 inches by 6 inches max). Where windows form part of the perimeter of the premises they must be equipped with steel bars.



4. Technological Security

Video Recording System

The following requirements must be met with respect to the visual recording system/devices at the site and building(s):

- The visual recording system must always operate/record in all lighting conditions and be remotely accessible both onsite and offsite.
- The visual recording system must provide full coverage of:
 - the site perimeter entry/exit points,
 - building perimeter,
 - rooms/areas where activities with cannabis are conducted, and
 - areas where cannabis travels between processes
 The visual recording system must be designed to detect
 attempted or actual unauthorized access, as well as illicit
 activity.
- The visual recording system must utilize video surveillance cameras with a minimum camera resolution of 1280 × 720 pixels; recording at a minimum of 15 frames per second.
- The visual recording system must be equipped with a failure notification system which provides a notification to the licensee and the BMCLA of any interruption or failure of the video surveillance system or video surveillance system storage device.

Video recordings must display the time and date and reside on a recording device which is secured in a manner to protect the recording from tampering or theft. All video recordings must be retained for a period of 90 days in the same form as the original recording (i.e. there can be no degradation of data/image quality).

- Video recordings of reportable security incidents must be isolated from the visual recording system/server on to a separate, archivable data storage medium and retained for a period of two (2) years.
- The visual recording system deployed at the site and building(s) must be equipped with adequate levels of redundancy to ensure continuous and uninterrupted operation.

5. Intrusion Detection System

5.1. The following requirements must be met with respect to the intrusion detection system deployed at the site and building(s):

- The intrusion detection system must always be:
 - operational;
 - capable of both on-site and off-site monitoring; and
 - monitored by persons knowledgeable in how to respond to any alarm activation.
- The intrusion detection system must provide full coverage (i.e., door contact sensors and motion detectors) of site perimeter access points, building perimeter access points, areas/rooms where activities with cannabis are conducted; and areas where cannabis will travel between processes.
- The intrusion device must be designed to detect attempted or actual unauthorized access and attempted or actual tampering with the system.
- The intrusion detection system must be equipped with a failure notification system which provides a notification to the licensee of any interruption or failure of the intrusion detection system and/or its key components.
- The intrusion detection system must be equipped with adequate levels of redundancy to ensure continuing and uninterrupted operation.
- The licensed cannabis facility must include a centrally monitored burglar alarm and fire system monitored by a security firm/company properly licensed/registered with the Defense and Security Department in the Prime Minister's office.

A licensee shall ensure a licensed security company or one or more of its registered alarm agents installs, maintains, monitors, and responds to the alarm system.



6. Panic Alarm System

6.1. The following requirements must be met with respect to the panic alarm system deployed at the premises:

- The panic alarm system must always be operational, be capable of both on-site and off-site monitoring and be always monitored by persons knowledgeable in how to respond to any alarm activation.
- The panic alarm activators/buttons must be deployed at/near building entry points (where activities with cannabis occur in the building) and within any room/area where cannabis is stored
- The panic alarm system must be equipped with a failure notification system which provides a notification to the licensee of any interruption or failure of the panic alarm system and/or its key components.
- The panic alarm system deployed at the building(s) must be equipped with adequate levels of redundancy to ensure continuing and uninterrupted operations.
- The panic buttons must be visually located throughout the facility to:
 - enable staff to trigger an alarm in the event of an emergency;
 - immediately send text and email alerts to all parties involved and alert the security company;
 - sound an audible alarm
- The silent alarm panic buttons, as applicable, should be (see Appendix A - Universal and Applied Security Measures) placed strategically throughout the facility that will trigger a "silent alarm", enabling employees to implement the sequence of events required when a "duress" code is utilized.

In the event of an emergency, such as an employee being forced to "disarm" a system by an intruder, entering a "duress" code should allow the alarm system to trigger a "silent" alarm that should notify the appropriate personnel of a security breach, as well as dispatch law enforcement.

7. Restricted Access & Electronic Access Control

7.1. The following steps must be taken to ensure access to areas/rooms, where activities with cannabis are conducted, are restricted to individuals whose presence in the room/area is required by their job duties:

- All access points such as doors, gates and ceiling hatches that lead into areas/rooms where activities with cannabis are conducted must be equipped with access control or restriction devices (e.g., proximity card readers with electric door strikes, door lock and key, etc.).
- The electronic access control system must always operate and facilitate access control and access logging in all rooms/areas where cannabis is located.
- The electronic access control and logging of access must occur on both sides of each door leading to/from any area where cannabis is located (i.e., to control and log individual access into and out of each cannabis room/area including storage area).
- The electronic access control system must be equipped with a failure notification system which provides a notification to the licensee of any interruption or failure of the electronic access control system and/or its key components.
- The electronic access control system deployed at the building(s) must be equipped with adequate levels of redundancy to ensure continuous and uninterrupted operations.
- Access credentials (e.g. keys, access cards) and/or permissions must only be granted to specific individuals for specific areas as required by their job duties.
- License holders must have a written procedure in place for granting temporary access and restricting access for visitors (i.e., guests, vendors and contractors) into areas/rooms where activities with cannabis are conducted.



- Everyone entering the licensed site and building(s) must always be:
 - issued with and display a laminated or plastic-coated identification badge, to be worn while on the site and premises.
- Identification badges for employees who must bear the license holder's name, employee's name, an exclusive employee number and a colour photograph of the employee showing the front of the employee's face and that is at least one (1) inch in width and 1.5 inches in height.
- Identification badges for non-employees (e.g. vendors, service technicians, sub-contractors) must display the word "VISITOR", bear an exclusive badge number, specify the date and duration of issue and be of a different colour than employee identification badges.
- A visitor log must always be maintained, showing the name, date, time and purpose of each visit by all non-employees.

8. Security Lighting

8.1. There are to be two (2) rings of security lighting; an outer and an inner.

The following requirements must be met with respect to the security lighting deployed at the site and building(s):

- The inner security lighting ring must be motion-activated and installed around the specified site perimeter such that the lighting units will activate if a person comes within ten feet of the perimeter/fence line. The lighting units must provide illumination that extends ten feet either side (i.e. inside and outside) of the fence.
- The outer security lighting ring must be permanently illuminated during hours of darkness at building perimeter entry/exit points. The lighting units must provide clear illumination of the entry/exit point and must be fully shielded or hooded so as not to cast light off the property onto neighbouring properties or skyward.
- The security lighting deployed at the site and building(s) must be equipped with adequate levels of redundancy to ensure continuous and uninterrupted operations.

9. Procedural & Personnel Security Measures

9.1. Security Personnel Deployment

As applicable, licensed, professionally trained security personnel must be deployed to patrol the site and building(s) and to respond to any security incident or alarm. (See Appendix A – Universal and Applied Security Measures)

10. Security Awareness

10.1 The following standards must be met with respect to the guidance and instruction to be provided to all persons working in, or entering upon, the site and building(s):

- All persons employed by the license holder (including staff under contract who work full-time for the license holder) working at the site and building(s) must be trained in general security awareness and security reporting requirements.
- Where site and building staff are asked or expected to undertake security-related duties, they must be adequately trained and supervised in the exercise of those duties.
- Anyone undertaking security-related activities or duties must follow the Security SOPs for the site and premises and must be trained in those SOPs.
- Staff should be made aware of designated waste bins, and procedures for cleaning and emptying.
- Staff should be able to identify what types of tamper-proof bags will be used, and how to identify when the bag is tampered with.
- Designated personnel must be identified to enter information into the identified Track-and-Trace system of the BMCLA.



11. Security Reporting

11.1. The following requirements must be considered by the licensee in the event of a report that must be made and kept in respect of illicit activity, actual/attempted, unauthorized access or tampering with any of the electronic security systems at the site or building(s):

- the specific information to be recorded as set out in the Regulations;
- the method used in which the record will be created and maintained (e.g. electronic, paper, etc.);
- the individuals who will have access to the records;
- \circ the location where the records will be stored.

11.2. Licensed operators are also required to keep a record of the number of employees onsite daily, occupancy during operating hours, frequency of deliveries or shipments originating from and/or arriving at the project site.

Each delivery whether incoming or outgoing must be entered into the approved track and trace system.

12. Cannabis and Cash Storage

12.1. The following requirements must be met with respect to the guidance and instruction to be provided to all persons working in, or entering upon, the site and building(s):

- Secure rooms or safes must be used for cannabis products and cash storage.
- Limited access to cannabis and cash secure storage rooms shall occur during business hours and all cash and cannabis products must be secured when the business is closed.
- Any safe utilized for cannabis products and cash storage must be incorporated into the building structure or securely attached thereto.
- All inventory stored on the licensed premises must be secured in a limited-access area.

- A licensee shall not store processed cannabis products outdoors.
- Employee break rooms, changing facilities, and bathrooms shall be separated from all storage areas.
- In the event of a disaster, a licensee or designated employee may move cannabis products to another location for a short time period to prevent loss, theft, or degradation of the cannabis products from the disaster.

The licensed operator must notify the BMCLA of the new location including the quantity of cannabis or cannabis products which is moved to the new location.

A secondary location for storage of cannabis and cannabis products (in the event of a disaster) must be included in your security master plan along with (1) the maximum quantity of cannabis <u>or</u>(2) the number of cannabis plants stored on-site at any one time.

13.Employee Security Training and Education

13.1. Your security master plan as applicable must address employee training and provide:

- verifiable and documented training for all employees prior to the employee starting any work.
- training provided to an employee in a handbook or other types of presentation material.

13.2. Employees shall receive verifiable and documented training on how to properly respond to key incidents, including but not limited to:

- robbery, burglary, intruders;
- threats of violence to licensees, agents or employees;
- assault weapons possession;
- $\circ\;$ civil, natural or man-made disasters;
- $\circ\;$ proper use of panic or burglar alarms;
- cybersecurity;
- the proper response when law enforcement or other first responders arrive at the facility; and
- incident reporting.



13.3. Training Records shall be stored in a secure area where the records are protected from:

- debris;
- moisture;
- contamination;
- hazardous waste;
- fire; and
- \circ theft.

13.4. Employee Training Records should include the basic following information, (but not limited to):

- $\circ\;$ the content of the training provided and
- \circ the names of the employees that received the training.

The Employee Training Records shall be retained for at least 365 days after the training has been provided.

14. Direction for Transport Licence Holders

14.1. Part VI Section 29 (1) of the Regulations indicates that applicants must adhere to terms and conditions:

The following requirements must be met with respect to the guidance and instruction to be provided to all persons working in the transportation of cannabis or cannabis products:

- Transportation of cannabis or cannabis products between licensees or licensed premises shall only be conducted by persons holding a transport license, or employees of those persons.
- Licensees must ensure that there are adequate layers of security on all vehicles transporting products.
- All products being transported should be accompanied by a travel manifest that accounts for all product and the destination of that product.
- All routes and times of transport should be monitored and randomized.
- All vehicles transporting cannabis or cannabis products for hire shall be required to have a permit issued by the Barbados License Authority pursuant to the Vehicle Code.
- Cannabis or cannabis products shall only be transported inside a vehicle and shall not be visible or identifiable from outside of the vehicle.
- Cannabis or cannabis products shall be locked in a box, container, or cage that is secured to the inside of the vehicle.
- While left unattended, vehicles must be locked and secured.
- The person driving the transport shall not leave a vehicle containing cannabis products unattended in a residential area or parked overnight in a residential area.



- A vehicle alarm system should be installed and working on all transport vehicles and trailers. Motion detectors, pressure switches, duress, panic, and hold-up alarms may also be used.
- Packages or containers holding cannabis or cannabis products shall not be tampered with, or opened, during transport.
- Under no circumstances may non-cannabis products, except for cannabis accessories and licensees' branded merchandise or promotional materials be transported with cannabis products.
- Vehicles transporting cannabis products are subject to inspection at any licensed premises or during transport at any time by authorized personnel of the BMCLA.
- All loading and unloading of cannabis, cannabis products or value-added products shall occur:
 - behind locked gates, and/or
 - inside a secured facility, and/or
 - in the presence of trained security personnel.
- Vehicles should be filled with fuel before travelling for the avoidance of stopping.

15. Reporting Incidences to the BMCLA

15.1 Part VI Section 30 (1) of the regulations indicates that applicants must adhere to terms and conditions:

An employee, licensee or agent shall notify the BMCLA **within 24 hours** of the discovery of any of the following situations:

- An employee, licensee or agent discovers a significant discrepancy in its inventory.
- An employee, licensee or agent discovers diversion, theft, loss, or any other criminal activity pertaining to the operations of the licensee.
- An employee, licensee or agent discovers loss or unauthorized alteration of records related to cannabis products, customers, or the licensee's employees or agents.

Appendix A - Universal and Applied Security Measures

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Requirements	Application	Explanation
A security master plan must be prepared and maintained which provides a detailed description of the security measures in place to protect the site and building(s) from unauthorized access, diversion/inversion of cannabis and other forms of illicit activity.	Universal application	This provision is applicable to all licence holders
The site perimeter, building perimeter and areas/rooms where activities with cannabis are conducted must be protected by physical barriers designed to deter and prevent unauthorized access.	Applied Application	For tier 1 cultivators and Tier 1 processors the need for two layers of security fencing is not mandatory. For retail distributors and holders of Laboratory, Research and Development and Transport licence holders the requirement for security fencing is not mandatory and depends on the location of the facility.
A site and building security diagram, fully-detailed and to- scale, must be maintained clearly showing the physical and technological security control measures in place at the licensed site and building(s).	Universal application	The diagram is a schematic of the security features and should not replicate the premises plan.

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Visual recording devices must be deployed and must be of high quality, operate at all times and provide full coverage of the site perimeter entry/exit points, building perimeter, rooms/areas where activities with cannabis are conducted and areas where cannabis travels between processes in all lighting conditions. Video recordings must be retained for a period of 90 days.	Universal application	Applicable to all categories of licenses
An intrusion detection system must be deployed and must be of high quality, operate at all times and allow for the detection of attempted/actual unauthorized access to site perimeter entry/exit points, building perimeter entry/exit points and rooms/areas where activities with cannabis will be conducted. The intrusion alarm system must be monitored at all times. Logs and reports of alarm activations must be retained for a period of two years	Universal application	The complexity of the system will move from low to high depending on the licence type for cultivator tiers three and four this must be tied to a security company who will respond to the alarm
An electronic access control system must be deployed and must be of high quality, operate at all times and allow for the control and logging of access in and out of the secure storage area. Access logs must be retained for a period of two years.	Tiered application	Tier 1 and 2 cultivator and processor will only need to provide signed log book if less than four employees.

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A panic alarm system must be deployed and must be of high quality, operate at all times and be equipped with panic alarm activators / buttons at or near premises entry points (where activities with cannabis occur in the building) and within any room/area where cannabis is stored	Applied Application	Tiers one and two cultivator and processor will only need one central panic alarm For all other licensees if the activity under the license is taking place in one central area for instance Research and Development activities one central panic alarm may also suffice.
Security lighting must be in place at both the site perimeter (motion-activated lighting) and at the building perimeter entry/exit points (permanent lighting during hours of darkness).	Universal application	Applicable for all licensees.
Access to areas/rooms where activities with cannabis are conducted must be restricted to individuals whose presence in the room/area is required by their job duties.	Universal application	Applicable for all licensees.
Licensed, professionally trained security personnel must be deployed to patrol the site and building(s) and to respond to any security incident or alarm. Drones can also be employed.	Applied application	Not applicable to Tier 1 and 1 cultivation and processor licencees. Applicability will depend on size and layout of property but this requirement is mandatory for Tier 3 and 4 cultivation licencee holders.
All those working in, or entering upon, the site and premises must receive guidance and instruction related to security awareness and security reporting	Universal application	The scope of the training will vary according to the size and complexity of the operations.



BARBADOS MEDICINAL CANNABIS LICENSING AUTHORITY

Let's Grow Together

WE ARE HERE TO HELP!

For further information on the Barbados Medicinal Cannabis Licensing Authority (BMCLA) or the Barbados Medicinal Cannabis Industry, please contact us:



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