



HOLY BASIL
"THE GROWERS CLUB"
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**To: THE COMMITTEE SECRETARY
PORTFOLIO COMMITTEE ON JUSTICE
AND CORRECTIONAL SERVICES
Attention: Mr V Ramaano**

Per email: vramaano@parliament.gov.za
cannabisbill@parliament.gov.za

SUBMISSION ON THE PROPOSED AMENDMENTS TO THE CANNABIS FOR PRIVATE PURPOSES BILL [B19-2020]

1. Your invitation for submissions to be made on the proposed amendments to the Cannabis for Private Purposes Bill [B19-2020]] refers.
2. We hereby propose certain amendments to the proposed wording of the Bill, so as to provide clarity and to avoid uncertainty and inconsistency in the future as to the ambit of the Bill's application, implementation and enforcement. We considered that it might be helpful if our proposal for a further amended wording be shared with all participants in advance of the meeting.
3. The second stated aim of the bill as currently proposed is in our view not sufficiently inclusive of all recreational users of cannabis, and we propose that the aim should be extended in its scope to read :

"To ... provide for the cultivation, possession and supply of cannabis plants and cannabis by growers for religious purposes in adherence to the Rastafarian faith on behalf of its members, and for the members of recreational cannabis clubs."
4. The wording as proposed by us will, if accepted, bring social clubs whose practices "traditionally involve the use of cannabis plants or cannabis" within the meaning of a "cultural community", as contemplated in section 1A(4). Recreational cannabis clubs would then be able to apply in terms of section 1B (a) and (b) to the Minister for the issuing of a permit.


5. If such application is approved the cultivation of cannabis plants and cannabis and the supply thereof to all the members of the club would be regulated by the conditions and restrictions that may be imposed in the particular permit.
6. We therefore propose that the following additional wording be inserted at the end of section 1B(11)(c), after the words "the Rastafarian faith":

".. and members of bona fide recreational cannabis clubs."
7. We also propose that the following definition be adopted for recreational cannabis clubs in section 1 of the Bill:

"recreational cannabis club" means a club, non-profit organisation or voluntary association of consenting adults that share and pursue a common interest in the cultivation and recreational use of cannabis and who combine their cultivation efforts to produce cannabis and cannabis products for its members."
8. We further propose that clarity be provided regarding the definition of a "private place" in the Bill, by inserting the following additional wording at the end of the definition of "**private place**" (after the words "as of right"):

"... provided that such a private place may be shared with other consenting adult persons."
9. The Growers Club requests that the above recommendations be considered in advance of the meeting and requests the Committee for the opportunity to make verbal submissions in support hereof at the meeting.

Yours faithfully,



Mauritz Grobler

Chairperson