



CANNABIS CONTROL COMMISSION

Public Commission Meeting

**Wednesday, December 13,
2017**

11:00 a.m.

Minihan Conference Room
Hurley Building, 6th Floor
19 Staniford Street
Boston, MA

DRAFT--FOR DISCUSSION PURPOSES ONLY

This presentation has not been reviewed or approved by the Cannabis Control Commission.



Cannabis Control Commission

12.12.17 Public Meeting

Agenda

- Call to Order
- Chairman's Comments & Updates
- Discussion of Policies and Draft Regulations
- New Business that the Chairman did not anticipate at time of posting
- Next Meeting date (if known)

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Cannabis Control Commission

12.11.17 Public Meeting

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Cannabis Control Commission Order of Discussion (Modified)

Framework & Licensing

A) Marijuana Establishments

- Marijuana Cultivator (KD)
 - Craft Marijuana Cooperative (KD)
- Marijuana Product Manufacturer (KD)
- Independent Testing Lab (KD)
- Marijuana Retailer (KD)
- Marijuana Distributor (SH)
- Marijuana Delivery Operator (SH)
- Marijuana Social Consumption Operator (ST)
 - Primary Use
 - Mixed Use
 - Event License
- Micro Business (ST)

B) Licensing Process (BM)

- General
- Specific Issues

C) Research Facilities (KD)

D) Priority Econ Empowerment Review (ST)

E) Social Equity (ST)

F) Background Checks (BM)

G) Action on Applications (BM)

H) Commission Approval of Changes (KD)

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Cannabis Control Commission Order of Discussion (Modified)

Operations

- Cultivation (KD)
 - Pesticides
 - Plant Nutrients
 - Organic Growing
 - Energy
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- Labs/Testing (KD)
- Retail
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 - Transportation/Delivery (SH)
 - Separation of Adult & Medical (KD)
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- Social Consumption (ST)
- Security and Incident Reporting (BM)
- Edibles (JF)
- Packaging, Labeling, Advertising (BM & JF)
- Inventory/Records/Cash Management (SH)
- Insurance (KD)

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Cannabis Control Commission Order of Discussion (Modified)

Operations (Continued)

- Waste Disposal
- Inspections and Compliance
- Actions on Licenses
 - Fines
 - Progressive Discipline
- Appeals
- Non-Conflict with Other Laws
- Notice List

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Cannabis Control Commission Order of Discussion (Modified)

Deferred Topics

- Retail Delivery Only Licenses (no brick and mortar)
- Non-retail delivery licenses
- Social Consumption
 - “BYOC” for Mixed Use Licenses
 - Event Licenses
- Fees and Capital Requirements by License Category
- Incentives for Experienced Industry Participants to Provide License Application Assistance to Equity Applicants

Additional Topics

- Leadership Program Categories
- Martha’s Vineyard/Nantucket

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Cannabis Control Commission

Draft Regulations Discussion

Issue: Operational Requirements for Marijuana Cultivation

Options:

- Require security and screening consistent with statutory requirements
- Require cultivation in compliance with generally accepted agricultural practices
- Require cultivators to comply with MA law on plant nutrient and pesticide application
- Require cultivators to grow consistently with federal standards for organic growing only if they label products “organic”
- Encourage best management practices for energy efficiency v. incorporate standards from other states

Recommendation: Require first two bullet points; encourage best management practices and have Energy and Environmental Workgroup convene to recommend best management practices for energy and environmental objectives in MA



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Cannabis Control Commission Draft Regulations Discussion

Issue: Operational Requirements for Marijuana Product Manufacturing

Options:

- Emulate requirements under medical use of marijuana regulations for handling of marijuana and marijuana products, which require compliance with existing MA regulations
- Create new marijuana-specific preparation requirements

Recommendation:

- Emulate requirements under medical use of marijuana regulations for handling of marijuana and marijuana products



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Cannabis Control Commission

Draft Regulations Discussion

Issue: Testing

Options:

- Adopt DPH testing protocols
- Create new testing protocols

Recommendation:

- Adopt DPH testing protocols
- Evaluate testing protocols on ongoing basis



Cannabis Control Commission Order of Discussion (Modified)

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Cannabis Control Commission

Draft Regulations Discussion

Consumer Access

Issue: How should Retail Marijuana Establishments, including Social Consumption Operations, ensure that only adults over the age of 21 are allowed on the premises?

Options:

- Adopt RMD regulations: inspection of ID immediately upon entry.

Recommendation: Adopt RMD regulation that upon entry, a Marijuana Establishment Agent shall immediately inspect an individual's identification, which shall contain a name, photograph and DOB and shall be limited to: a driver's license; a government-issued identification card; a military identification card; or a passport.



Cannabis Control Commission

Draft Regulations Discussion

Consumer Access

Issue: How should Retail Marijuana Establishments that offer both medical and recreational marijuana products ensure that only those legally authorized to be on the premises are allowed access?

Options:

- Adopt Industry Sub-committee recommendation: for co-located retail/medical establishments, adopt regulation explicitly prohibiting consumers under the age of 18 without a valid registration card.

Recommendation: Adopt Industry Sub-committee recommendation allowing only those individuals 18 or over with a valid registration card on premises that offer both, and ensure separation at POS.



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Draft Regulations Discussion

Issue: Transportation Requirements

Context:

- Licensees can transport their own product as part of their license
- Third – party transportation licenses will be issued
- A ME licensee that wishes to transport other entities' product must get a separate transportation license

Recommendation: Adapt DPH Transportation Protocol including:

- Vehicle must be owned by licensed entity
- Vehicle and driver must be licensed according to Mass RMV requirements for the class of vehicle
- Vehicle equipped with fixed GPS, two-way communication with shipping entity, alarm system
- No vehicle labeling identifying content
- Product not visible from outside
- Product kept in locked box secured to vehicle
- Manifest kept on board
- Linked to seed-to-sale tracking system



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Draft Regulations Discussion

Issue: Delivery Requirements

Context:

- Retail licensees can deliver product as part of their retail license
 - Oregon: Deliveries only within municipality where retail license is granted
- Undecided:
 - Delivery – only retail license (no bricks and mortar)
 - Third party delivery (no retail license)

Recommendation: As per transportation plus:

- Positive identification of delivery recipient, proof of age (21 or older)
- Identical packaging requirements as is sold at retail establishment
- To be discussed:
 - Limit of total value of product in vehicle at any time
 - Oregon: \$3,000 retail value maximum, multiple orders under this maximum
 - Hours of operation
 - Oregon: 8:00 AM – 9:00 PM
 - Delivery to sites other than personal residences



Cannabis Control Commission

Draft Regulations Discussion

Issue: Separation of Adult Use Marijuana and Marijuana Products from Medical Use Marijuana and Marijuana Products

Options:

- Virtual separation through tracking system
- Physical separation
- Combination of virtual and physical separation

Recommendation:

- Combination of virtual and physical separation: virtual separation until point of sale and physical separation in the retail location due to differences in potency limitations



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Draft Regulations Discussion

Employees—Marijuana Establishment Agents

Issue: Whether to require employees of Marijuana Establishments to register with the Commission as M.E. Agents?

Options:

- Adopt DPH regulations relative to dispensary agents at 105 CMR 725.030

Recommendation:

- Adopt a DPH-like regulation requiring employees to obtain 1-year registration, paid for by the licensee;
- Require M.E. Agents to carry a registration card with them at all times;
- Allow for individual to be affiliated with multiple Marijuana Establishments;
- Immediately void registration upon separation from M.E. Establishment.



Cannabis Control Commission

Draft Regulations Discussion

Issue: Training & Responsible Vendor Program

Options:

- Marijuana Establishments shall ensure that all Marijuana Establishment Agents complete training prior to performing job functions.
- Training shall be tailored to the roles and responsibilities of the job function of each Marijuana Establishment Agent, and at a minimum must include a responsible vendor program (next slides).
- At a minimum, staff shall receive 8 hours of on-going training annually.
- Additional or different requirements

Recommendation:

- Adopt Training & Responsible Vendor Program as outlined on slides



Cannabis Control Commission

Draft Regulations Discussion

Issue: Responsible Vendor Program Elements

Options:

- Modeled on CO program
- At time of initial licensure, applicant must demonstrate that personnel that handle or sell marijuana have successfully completed responsible vendor program
- Once designated “responsible vendor” Marijuana Establishment must have all new employees thereafter complete program within 90 days of hire
- Must do responsible vendor training at least once every 2 years and training completion is portable to new job
- Administrative personnel that do not handle or sell marijuana may take responsible vendor program on voluntary basis
- Marijuana establishments must maintain records demonstrating compliance
- No owner or employee of a responsible vendor program shall have an interest in a licensed Marijuana Establishment.



Cannabis Control Commission

Draft Regulations Discussion

Issue: Responsible Vendor Program Elements

Options:

- Program providers shall submit their programs to the Commission for approval every two years for approval as a responsible vendor program.
- The program shall include at least two hours of instruction time.
- The program shall be taught in a real-time, interactive classroom setting where the instructor is able to verify the identification of each individual attending the program and certify completion of the program by the individual identified.
- The program provider shall maintain its training records and make the records available for inspection by the Commission and any other applicable licensing authority upon request during normal business hours.
- The program shall provide written documentation of attendance and successful passage of a test on the knowledge of the required curriculum for each attendee.
- Program providers shall solicit effectiveness evaluations from individuals who have completed their program.



Cannabis Control Commission

Draft Regulations Discussion

Issue: Responsible Vendor Program Curriculum

Options:

- Discussion concerning marijuana's effect on the human body. Training shall include:
 - Marijuana's physical effects based on type of marijuana product;
 - The amount of time to feel impairment;
 - Visible signs of impairment; and
 - Recognizing the signs of impairment.
- Diversion prevention and prevention of sales to minors.
 - Compliance with all tracking requirements; and
 - Best practices for diversion prevention and prevention of sales to minors.
- Acceptable forms of Identification. Training shall include:
 - How to check identification;
 - Spotting false identification;
 - Patient Registration Cards issued by the department of public health;
 - Provisions for confiscating fraudulent identifications; and
 - Common mistakes made in verification.



Cannabis Control Commission

Draft Regulations Discussion

Issue: Responsible Vendor Program Curriculum (cont'd)

Options:

- Other key state laws and rules affecting owners, managers, and employees:
 - Local and state licensing and enforcement;
 - Incident and notification requirements;
 - Administrative and criminal liability;
 - License sanctions and court sanctions;
 - Maintenance of records;
 - Prohibited purchases and practices;
 - Patrons prohibited from bringing marijuana onto licensed premises;
 - Permitting inspections by state and local licensing and enforcement authorities;
 - Licensee responsible for activities occurring within licensed premises;
 - Waste disposal;
 - Permitted hours of sale;
 - Health and safety standards;
 - Conduct of establishment;
 - Privacy issues;
- Such other areas of training determined by the Commission to be included in a responsible vendor training program.



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Cannabis Control Commission

Draft Regulations Discussion

Issue: Application & Operational Requirements

Options:

- *Start with elements from other marijuana establishments
- *Modify and add requirements as necessary

Recommendations:

- *Products from licensed cultivators or manufacturers (restaurant exception)
- *Allow only individual servings. No marijuana may leave the premises
- *Develop Cannabis Awareness & Response Education for employees
- *Add requirement for reasonable plan to assist with patron transportation
- *Prohibit any sales of alcohol at marijuana consumption establishments
- *Allow small Mixed Use & Event Licensees to apply for exemptions focusing on reasonable requirements in light of entity's size and nature



Cannabis Control Commission

Draft Regulations Discussion

Issue: Smoking

Recommendations:

- *Allow municipalities to permit smoking
- *Allow establishments licensed by the Department of Revenue as smoking bars to permit smoking
- *By January 31, 2018, appoint a special working group to create recommendations for regulations on smoking and other forms of social consumption by July 1, 2018
 - *Ventilation guidelines
 - *Odor control including carbon filtration systems
 - *Employee exposure to secondhand marijuana smoke



Cannabis Control Commission

Draft Regulations Discussion

Issue: Limitations on ownership and number of social use licensees

Options:

- *No limitations
- *Decrease, increase, or stay consistent with 3-license limit
- *Consider municipal limits

Recommendations:

- *A licensee may be granted up to 3 Primary Use Licenses, up to 3 Mixed Use Licenses, and up to 10 Event Licenses at one time
- *No social use licenses may operate in municipalities with bans or moratoria on marijuana establishments. Primary Use Licenses count toward numerical municipal limits; Mixed Use and Event Licenses do not.
- *Modify local control requirements for Mixed Use and Event Applicants



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Cannabis Control Commission

Draft Regulations Discussion

Security and Incident Reporting

Issue: Whether the Commission should adopt DPH security regulations?

Options:

- Follow Public Safety Subcommittee recommendation of adopting DPH regs as a starting point.

Recommendation:

- As the Public Safety Subcommittee stated: security regulations for the medical cannabis program are strong, and should be used by the CCC.
- Adherence to the Cole memo and the enforcement areas it emphasizes may prevent federal intervention and should be prioritized (i.e. prevent diversion to other states, access by youth).
- Specific provisions relative to security include requiring: surveillance locations; mandated reporting; security systems with back-up alarm systems; storage and safekeeping of inventory in secure locked safe or vault; creating well-defined limited access areas and employee protocols.



Cannabis Control Commission

Draft Regulations Discussion

Security and Incident Reporting

Issue: Whether modifications to security measures are needed depending on the facilities (indoor/outdoor) and size of operation to decrease barriers to entry?

Options:

- Adopt Public Safety Sub-committee recommendation outdoor cannabis cultivation areas shall be fortified with fencing, alarms, cameras.
- Adopt Public Safety Sub-committee recommendation that the Commission designates funds for small businesses to meet security rules and provides for the acceptance of alternative security safeguards.

Recommendation:

- Adopt Public Safety Subcom recommendations with regard to alternative security safeguards and provide for specific regulations for outdoor cannabis cultivation that include:
 - Perimeter fencing designed to prevent unauthorized access
 - Video cameras at points of entry/exit and in parking lots;
 - Surveillance system continuously monitored electronically, my monitoring company or my other means determined to be adequate by Commission and that provides alerts to system failure;
 - Surveillance system in locked area with limited access.



Cannabis Control Commission

Draft Regulations Discussion

Security and Incident Reporting

Issue: Whether the Marijuana Establishment should be required to share its security plan and procedures with local law enforcement and update local law enforcement in the plans or procedures are modified in a material way.

Options:

- Adopt Public Safety Sub-committee recommendation that all Marijuana Establishments should notify the local chief of police about security protocols and establish a liaison to law enforcement.
- Adopt CO-like regulation that requires security plans to include a description of the location and operation of the security system, including the location of the central control on premises, a schematic of security zones and the name of the security and monitoring company, if any.

Recommendation:

- **Adopt both the Public Safety Sub-committee recommendation and a CO-like regulation specifying details of security system plan** that includes a description of the location and operation of the security system, including the location of the central control on premises, a schematic of security zones and the name of the security and monitoring company, if any.



Cannabis Control Commission

Draft Regulations Discussion

Security and Incident Reporting

Issue: Whether the Commission should adopt specific incident reporting regulations?

Options:

- Adopt DPH regulations requiring notification to law enforcement and oversight agency within 24 hours, per 105 CMR 725.110(F).

Recommendation:

- Adopt DPH-like reporting requirement that Commission and law enforcement be notified within 24 hours of diversions, theft or losses; discrepancies; criminal actions; alarm activations requiring a public safety personnel or private security response; failure of an alarm system expected to last more than 8 hours;
- Written report to Commission within 10 days of incident;
- Maintenance of documentation related to incident for not less than 1 year and made available to Commission or law enforcement acting in their lawful jurisdiction upon request.



Cannabis Control Commission

Draft Regulations Discussion

Security Requirements

Statutory Requirement

(a 1/2) The commission shall, in accordance with chapter 30A, adopt regulations consistent with this chapter for the administration, clarification and enforcement of laws regulating and licensing marijuana establishments. The regulations shall include...

(xviii) minimum security requirements for licensees sufficient to deter and prevent theft and unauthorized entrance into areas containing marijuana, which shall include but not be limited to the use of security cameras, provided that the requirements shall not prohibit the cultivation of marijuana outdoors or in greenhouses;

M.G.L. c. 94G, §4(a 1/2)(xviii)



Cannabis Control Commission

Draft Regulations Discussion

Security Requirements

Issue: What types of security requirements should the Commission require of Marijuana Establishments?

Recommendation: Adopt security requirements that mirror DPH with additional recommendations made by Cannabis Advisory Board Public Safety and Community Mitigation sub-committee. In addition, have specific requirements for open cultivation facilities that are calibrated to that environment.



Cannabis Control Commission

Draft Regulations Discussion

Security Requirements

General Requirements:

- **Positive I.D. to limit access to those 21+**
- **Securing all entrances**
- **Establishing Limited Access Areas**
- **Secure locked storage**
- **Sufficient external lighting**
- **Limited external visibility**
- **Developing emergency policies and procedures to secure all product and perform a security assessment following a diversion, theft or other loss of marijuana**
- **Sharing the Marijuana Establishment's security plan and procedures with local law enforcement and updating upon material modification**



Cannabis Control Commission

Draft Regulations Discussion

Security Requirements

Recommendation II: Provide for Alternate Security Provisions

Recommendation III: Require Marijuana Establishments to create Limited Access Areas explicitly restricted to specifically permitted individuals within the M.E., as well as agents of the Commission and law enforcement and emergency personnel acting within their lawful jurisdiction and official capacity.

Recommendation IV: Adopt DPH RMD Security System Requirements included at 105 CMR 725.110 for enclosed, indoor facilities.



Cannabis Control Commission

Draft Regulations Discussion

Security Requirements—Outdoor Cultivation

Recommendation V: Adopt specific requirements relative to outdoor cultivation facilities. Require that Marijuana Cultivators operating outdoor facilities implement adequate security measures to ensure that outdoor areas are not readily accessible to unauthorized individuals and to prevent and detect diversion, theft or loss of marijuana, including:

- Perimeter security fencing designed to prevent access with clear notice;
- A security system that is continuously monitored, whether electronically or by person, and provides a means of alert when there is a failure or breach;
- Video cameras at all points of entry and exit
- Twenty-four hour recording by cameras and ability to immediately produce images;
- A means to limiting access and locking surveillance equipment.



Cannabis Control Commission

Draft Regulations Discussion

Incident Reporting

Recommendation VI: Adopt Incident Reporting requirements as included in DPH RMD regulations at 105 CMR 725.110(F)

- **Notice to Commission within 24 hours of incident**
- **Incident report to Commission within 10 days that includes corrective action**
- **Requirement to preserve and provide documentation pertaining to incident to Commission agents and law enforcement.**



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Cannabis Control Commission

Draft Regulations Discussion

Issue: What, if any, restrictions should be placed on the appearance of edible products?

Options:

- ✓ No restrictions
- ✓ Restrict products from being produced that bears a resemblance to the likeness of human, animal, fruit or sports equipment, as well as others shapes/likeness as determined by the Commission

Recommendation: Restrict products from being produced that bears a resemblance to the likeness of human, animal, fruit or sports equipment, as well as others shapes/likeness as determined by the Commission



Cannabis Control Commission

Draft Regulations Discussion

Issue: What, if any, restrictions should be placed on the name of edible products?

Options:

- ✓ No restrictions on the name of edible products
- ✓ Restrict products from being named anything similar to those of mainstream items consumed by minors

Recommendation: Restrict products from being named anything similar to those of mainstream items consumed by minors



Cannabis Control Commission

Draft Regulations Discussion

Issue: What, if any, restrictions should be placed on the taste of edible products?

Options:

- ✓ No restrictions on the taste of edible products
- ✓ Restrict products from tasting anything similar to those of mainstream items consumed by minors

Recommendation: Restrict products from tasting anything similar to those of mainstream items consumed by minors



Cannabis Control Commission

Draft Regulations Discussion

Issue: Placement of Universal Symbol on edible products

Options:

- ✓ No placement of the Universal Symbol directly on edible products
- ✓ Placement of the Universal Symbol directly on edible products considered to be “per se practicable” to be marked as determined by the Commission

Recommendation: Placement of the Universal Symbol on at least one side of the edible products considered to be “per se practicable.” For products not considered to be “per se practicable” the placement of the Universal Symbol on the package will be deemed sufficient.



Cannabis Control Commission

Draft Regulations Discussion

Issue: Determine the serving sizes for edible products and the number of servings per package.

Options:

- ✓ No restrictions on serving size or servings per package
- ✓ Limit of 5mg per serving, 20 servings per package
- ✓ Limit of 10 mg per serving, 10 servings per package

Recommendation: Limit edibles to 5mg per serving with 20 servings per package



Cannabis Control Commission

Draft Regulations Discussion

Issue: Determine THC edible products to be sold.

Options:

- ✓ No Commission approval on any THC edible product that comes to market
- ✓ Require commission approval on any THC edible product that comes to market

Recommendation: Require that all new THC edible products be approved by the Commission prior to coming to market



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Cannabis Control Commission

Draft Regulations Discussion

Packaging

Issue: Whether to adopt the recommendations of the Industry and Public Health Sub-Committees on packaging?

Options:

- Adopt the recommendations in their entirety.
- Adopt Council on Responsible Cannabis Regulation recommendations.
- Adopt Oregon regulations.
- Hybrid

Recommendation:

- Hybrid approach.
- Adopt the Sub-Committees recommendations, plus best practices from the CRCR and Oregon.
- Focus on child safety and consumer welfare reflected in regs.



Cannabis Control Commission

Draft Regulations Discussion

Packaging

Specific Recommendations:

- Adopt limits on packaging design as spelled out in statute and recommended by Industry Sub-Com and adopted in Oregon;
- Require child resistant packaging across all Marijuana and Marijuana Products that has been tested by qualified third party;
- Require packaging to be opaque or plain in design;
- Require packaging to be resealable if more than 1 serving;
- Where compliance with above requirements deemed to be impracticable, Marijuana Products must be placed in exit packaging capable of being resealed, with child warning.
 - *Oregon best practice*



Cannabis Control Commission

Draft Regulations Discussion

Packaging of Multiple Servings

Issue: Whether Commission should adopt specific regulations relative to the packaging of multiple servings?

Recommendation:

- As a commonly cited concern, Commission should lead by adopting recommendations that address underlying issues of overconsumption.
- Allow the consumer to easily identify a single serving in a multi-serving package;
- Include a statement on the exterior: “INCLUDES MULTIPLE SERVINGS;
- Scored where possible into individual servings (i.e., cookies)
- If liquid, packaged with a measuring device that measures individual servings
 - CRCR recommendation



Cannabis Control Commission

Draft Regulations Discussion

Labeling

Specific label provisions applicable across all categories of products:

- **Labeling happens at the point of origin**
- **Name & registration number of M.E., contact information;**
- **Quantity of usable marijuana;**
- **Date packaged**
- **Batch number, sequential serial number, bar code;**
- **Full cannabinoid profile**
- **Testing seal**
- **Warning as provided in statute**
- **2 symbols: contains marijuana and harmful to children**
- **Known allergens**



Cannabis Control Commission

Draft Regulations Discussion

Labeling-Edible MIPs

Additional Edible MIP requirements:

- Net weight or volume in U.S. customary and metric units
 - Oregon reg, CRCR rec
- Type of marijuana used to produce the product, including processing techniques/solvents;
- Amount in grams of sodium, sugar, carbs, and total fat/serving;
- Number of servings
- Directions for use



Cannabis Control Commission

Draft Regulations Discussion

Labeling- Concentrates and Extracts

Additional Concentrate/Extract Requirements:

- Net weight or volume in U.S. customary and metric units
 - Oregon reg, CRCR rec
- Type of marijuana used to produce the product, including processing techniques/solvents;
- Product identity;
- Number of servings;
- Topicals/tinctures provisions the same.



Cannabis Control Commission

Draft Regulations Discussion

Issue: Advertising of Marijuana

Options:

- ✓ Only adopt provisions in Chapter 55 of the Acts of 2017
- ✓ Adopt provisions in Chapter 55 of the Acts of 2017 and other suggestions listed below.

Recommendation: Adopt provisions in Chapter 55 of the Acts of 2017 and the following prohibited actions;



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Prohibit:

- ✓ Advertising of an improper or objectionable nature, including without limitation the use of recipe books or pamphlets for marijuana products which contain obscene or suggestive statements or other offensive matter
- ✓ Signs or other printed matter advertising any brand or kind of marijuana product shall be displayed on the exterior or interior of any licensed premises wherein marijuana products are not regularly and usually kept for sale
- ✓ Advertising that promotes excessive consumption of marijuana products
- ✓ Transit advertising on or in public or private vehicles and at bus stops, taxi stands, transportation waiting areas, train stations, airports, etc., including without limitation vinyl wrapped vehicles, and logoed vehicles, and logoed delivery vehicles and company cars
- ✓ Advertising that is targeted towards minors



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Issue: Placement of warnings on advertising

Options:

- ✓ No requirements to place warning statements on any form of advertising
- ✓ Placement of warning statements as listed below

Recommendation: Require advertising to contain the following warnings:



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- ✓ “This product has intoxicating effect and may be habit forming”
- ✓ “Marijuana can impair concentration, coordination, and judgement. Do not operate a vehicle or machinery under the influence of this drug”
- ✓ “There may be health risks associated with consumption of this product”
- ✓ “For use only be adults twenty-one and older. Keep out of reach of children”
- ✓ “Marijuana should not be used by women who are pregnant or breast feeding”



Cannabis Control Commission Order of Discussion (Modified)

Operations

- Cultivation (KD)
 - Pesticides
 - Plant Nutrients
 - Organic Growing
 - Energy
- Manufacturing (KD)
- Labs/Testing (KD)
- Retail
 - Consumer Access (BM)
 - Transportation/Delivery (SH)
 - Separation of Adult & Medical (KD)
 - Employees (BM)
- Social Consumption (ST)
- Security and Incident Reporting (BM)
- Edibles (JF)
- Packaging, Labeling, Advertising (BM & JF)
- Inventory/Records/Cash Management (SH)
- **Insurance (KD)**

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Draft Regulations Discussion

Issue: Liability Insurance

Options:

- \$1 million per incident; \$2 million annual aggregate
- Alternate amount of insurance determined adequate by Commission
- \$250K in escrow account

Recommendation:

- Provide all three options



Cannabis Control Commission Order of Discussion (Modified)

Operations (Continued)

- **Waste Disposal**
- Inspections and Compliance
- Actions on Licenses
 - Fines
 - Progressive Discipline
- Appeals
- Non-Conflict with Other Laws
- Notice List

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Draft Regulations Discussion

Issue: Waste Disposal

Options:

- Emulate waste disposal requirements for medical use of marijuana, which require compliances with MA law
- Allow development of recycling options as required by statute

Recommendation:

- Emulate waste disposal requirements for medical use of marijuana
- Allow development of recycling options as required by statute
- Make waste disposal part of issues considered by Energy and Environmental Workgroup



Cannabis Control Commission Order of Discussion (Modified)

Operations (Continued)

- Waste Disposal
- Inspections and Compliance
- Actions on Licenses
 - Fines
 - Progressive Discipline
- Appeals
- Non-Conflict with Other Laws
- **Notice List**

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Draft Regulations Discussion

Issue: Notice List

Options:

- Invite stakeholders and members of the public to sign-up to receive notification of meetings, documents and other matters of interest

Recommendation:

- Invite stakeholders and members of the public to sign-up to receive notification of meetings, documents and other matters of interest



Cannabis Control Commission

12.11.17 Public Meeting

Agenda

- Call to Order
- Chairman's Comments & Updates
- Discussion of Policies and Draft Regulations
- **New Business that the Chairman did not anticipate at time of posting**
- **Next Meeting date (if known)**

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Next Meeting Date

10:30 AM

December 14, 2017

Hurley Building, Minihan Conference Room
19 Staniford Street
Boston, MA

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