

Subject: Proposal to Amend Traceability Requirements in WAC 314-55-083

Introduction:

The current traceability requirements under WAC 314-55-083 mandate that all cannabis plants eight or more inches in height or width must be physically tagged and tracked individually. While the intention of ensuring safety and preventing diversion is commendable, this requirement places an undue burden on licensees without clearly stating the specific purpose of improving public safety or preventing diversion.

Proposed Amendment:

I propose to amend section 4(f) of the traceability requirements as follows:

"(f) All cannabis plants eight or more inches in height or width must be physically tagged and tracked. However, instead of requiring individual unique identifiers for each plant, licensees may utilize a batch tracking system, where plants of the same strain and growth stage are grouped together under a single unique identifier. This approach maintains the integrity of the traceability system while reducing the complexity and administrative burden on licensees."

Rationale:

Simplification: The proposed amendment simplifies the tracking process, making compliance more manageable for licensees.

Cost-Effectiveness: By allowing batch tracking, the proposal reduces costs associated with tagging and tracking individual plants.

Maintaining Safety and Integrity: The amendment maintains the core objective of preventing diversion and promoting public safety by ensuring that cannabis is traceable from seed to sale.

Other Inventories are Batch Tracked: Clones can be tracked using batches. Harvests can also be tracked using batches. Individual plant tracking does nothing except increase complexity of operations.

Conclusion:

The proposed amendment to WAC 314-55-084 seeks to balance the need for robust traceability with the practical considerations of licensees. By allowing for batch tracking, the amendment streamlines the process without compromising the goals of safety and prevention of diversion.

I kindly request your consideration of this proposal and welcome any feedback or questions.

Sincerely,

Anders Taylor
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