



DEDICATED TO THE ADVANCEMENT OF A VITAL, ETHICAL, EQUITABLE, AND SUSTAINABLE CANNABIS INDUSTRY

[www.thecannabisalliance.us](http://www.thecannabisalliance.us)

27 February 2025

### Rule Amendment Change WAC-314-55-095 Petition Attachment

The Cannabis Alliance respectfully submits this addendum to the rulemaking form to propose an amendment to WAC 314-55-095, removing the restriction that limits cannabis concentrates to a 1-gram unit size. This change would allow concentrates to be packaged in multi-gram containers while maintaining compliance with existing daily purchase limits. By enabling more efficient packaging solutions, this amendment would significantly reduce single-use plastic and glass waste, enhance product sustainability, and improve consumer convenience without compromising public health or safety. Additionally, allowing multi-gram vapor hardware could reduce the volume of disposable vape batteries, mitigating the environmental and workplace hazards faced by recycling centers. We appreciate your consideration of this amendment in support of a more sustainable and responsible cannabis industry in Washington.

#### **I am requesting the following change:**

Amend WAC 314-55-095 to remove the restriction limiting cannabis concentrates to a 1-gram unit size. We propose allowing cannabis concentrates to be packaged in single containers holding multiple grams, provided the total package contents remain within the daily purchase limits set by state law. This change would reduce the number of single-use containers required for concentrate packaging without increasing purchase limits.

#### **This change is needed because:**

The current 1-gram unit size restriction for cannabis concentrates creates unnecessary packaging waste, limits product innovation, and restricts consumer choice without providing any meaningful public health or safety benefits. While enforcement has clarified that multiple 1-gram units can be sold within a single package, the lack of widely available, sustainable packaging solutions makes compliance inefficient and environmentally harmful. Removing the 1-gram unit size restriction would allow processors to utilize existing, child-resistant (CR) packaging—such as 9ml concentrate jars—to hold multiple grams in a single container without requiring costly retooling or additional materials. This change would not increase purchase limits but would drastically reduce the number of single-use plastic and glass containers used in the industry. With over 10 million units of concentrates sold annually in Washington, transitioning to

multi-gram packaging would eliminate millions of unnecessary single-use packages, reducing waste and improving environmental sustainability.

Additionally, the cannabis vapor market has shifted primarily to single-use vape devices, which contain non-recyclable lithium-ion batteries. These disposable devices are a growing environmental and occupational hazard, as improperly discarded vape batteries pose a significant fire risk at recycling facilities. The waste crisis in the industry is directly contributing to unsafe working conditions, and recycling centers have now become the fourth deadliest job in America. Allowing multi-gram vapor hardware, which is already being sold in other states, would reduce the number of devices disposed of per gram of cannabis concentrate, significantly lowering battery waste and reducing the risk to recycling center workers. With over 20 million grams of vape products sold annually, enabling larger-capacity vapor hardware would have a measurable impact on waste reduction while improving the safety and sustainability of the industry.

For example, a 7-gram unit currently being sold in Washington is excessively wasteful, requiring seven individual jars plus additional plastic blister packaging—yet it lacks CR functionality after being opened. Under our proposal, the same amount of concentrate could be packaged in a single jar with a CR lid, making it safer for child prevention while significantly reducing waste. This common-sense change would modernize packaging standards, promote environmental responsibility, and align Washington’s policies with more sustainable practices already being adopted in other states.



**The effect of this rule change will be:**

This change will drastically reduce the use of single-use plastic and glass packaging in the cannabis industry by allowing multiple grams of concentrates to be packaged in a single container. Consumers will benefit from more convenient and sustainable packaging, and reduce waste. Importantly, this change will not negatively impact public health or safety, as it maintains

the existing daily purchase limits for concentrates. A reduction in vape battery hardware will have a significant positive impact on our waste & make our recycling center workers safer. Overall, this rule change will support a more sustainable and efficient cannabis marketplace in Washington.

**Proposed Change:**

We recommend removing the restriction that limits cannabis concentrates to a 1-gram unit size. This arbitrary limitation stifles product innovation and consumer choice without meaningfully contributing to public health or safety. Expanding unit size options would significantly reduce packaging waste. By increasing the allowable unit size, we are not advocating for a higher daily purchase limit but rather enabling multiple grams to be contained in a single jar—streamlining packaging while maintaining compliance. With over 10 million concentrate units sold annually, this simple change could eliminate millions of single-use packages, making a substantial environmental impact while maintaining regulatory integrity.

(b) **Maximum number of servings.** The maximum number of servings in any one single unit of cannabis-infused product meant to be eaten or swallowed or otherwise taken into the body is 10 servings or 100 milligrams of active THC, or Delta 9. ~~A single unit of cannabis concentrate cannot exceed one gram.~~ **A single unit of Cannabis Concentrates can be packaged up to the daily purchasing limits.**

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Caitlein Ryan', with a long horizontal flourish extending to the right.

Caitlein Ryan, PhD  
Executive Director, The Cannabis Alliance  
[caitlein.ryan@thecannabisalliance.us](mailto:caitlein.ryan@thecannabisalliance.us)  
425-314-9004