



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

www.thecannabisalliance.us

27 February 2025

Rule Amendment Change WAC-314-55-105 Petition Attachment

The Cannabis Alliance respectfully submits this petition to amend WAC 314-55-105 to allow cannabis-infused edibles in solid form to be packaged loosely in multi-use, resealable, child-resistant (CR) packaging without requiring individual wrapping or case-by-case approval from the Liquor and Cannabis Board (LCB). This change will reduce plastic waste, enhance child safety, and streamline the regulatory process. Detailed justifications, environmental impact data, and proposed rule language are provided in the attached document as responses to the request form. We appreciate your consideration of this amendment in support of a more sustainable and efficient cannabis industry in Washington.

I am requesting the following change:

Amend WAC 314-55-105 to allow cannabis-infused edibles in solid form to be packaged loosely in multi-use, resealable, child-resistant (CR) packaging without requiring individual wrapping or case-by-case approval from the Liquor and Cannabis Board (LCB). Multi-use CR packaging options, such as tins, resealable bags, boxes, and tubes, should meet the Poison Prevention Packaging Act standards to ensure public safety.

This change is needed because:

The current rule requiring individually wrapped edibles generates an excessive amount of single-use plastic waste, contributing to significant environmental harm without significantly improving child safety. With over 8.5 million edibles sold in 2024 that is up to 85 million single use plastic pouches used annually going into our landfills, streets, and waterways. Individually wrapped edibles are less secure once the outer package is opened, whereas multi-use CR packaging retains child-resistant functionality over time. Additionally, the current case-by-case approval process for non-individually wrapped packaging creates unnecessary delays and burdens to both businesses and the LCB, making the regulatory process inefficient and costly.

The effect of this rule change will be:

This change will reduce plastic waste by eliminating the need for individually wrapped edibles, aligning with Washington's environmental sustainability goals. It will enhance public safety by

ensuring that cannabis edibles remain secured in child-resistant packaging even after repeated use. Furthermore, it will streamline the regulatory process, reducing compliance costs and administrative burdens on both cannabis businesses and the LCB. Ultimately, the rule change will create a more efficient, sustainable, and competitive cannabis industry in Washington.

Proposed Changes:

We advocate for the removal of the requirement for individually wrapping cannabis-infused edibles, which is currently permitted only on a case-by-case basis. Eliminating this requirement will significantly reduce approval times for the Liquor and Cannabis Board (LCB) and help curb the massive plastic waste generated by the industry. Instead, we propose a clear mandate that non-individually wrapped edibles must be placed in multi-use, child-resistant (CR) packaging that meets Poison Prevention Packaging Act standards.

Many states, including Oregon, California, and Colorado, have already adopted multi-use CR packaging solutions, demonstrating its effectiveness in maintaining product safety while reducing environmental impact. The cannabis industry has access to a wide range of compliant packaging options, such as tins, resealable bags, boxes, and tubes, which ensure child resistance even after multiple uses. By aligning Washington's regulations with other leading cannabis markets, this change will not only reduce waste but also strengthen consumer safety and regulatory consistency. Adopting this approach supports Washington's sustainability goals while maintaining a secure and responsible marketplace.

(3) **Cannabis edibles in solid form.** The following standards apply to all packaging and labeling of cannabis edibles in solid form:

(a) Containers or packaging containing cannabis edibles in solid form must protect the product from contamination. Containers or packaging must not impart any toxic or harmful substance to the cannabis edibles in solid form.

(b) Cannabis edibles in solid form must be packaged:

(i) In child resistant packaging consistent with 16 C.F.R. Part 1700, Poison Prevention Packaging Act; or

(ii) In plastic that is two mil or greater in thickness, heat sealed without an easy-open tab, dimple, corner, or flap that will protect persons under the age of 21 from accidental exposure to cannabis edibles in solid form.

~~(c) Cannabis infused edibles in solid form, such as capsules, lozenges, and similar products approved by the board on a case-by-case basis may be packaged loosely within a resealing outer package that is child resistant in accordance with Title 16 C.F.R. 1700 of the Poison Prevention Packaging Act.~~

All Cannabis-infused edibles in solid form, may be packaged loosely within a resealable CR package or container that is a reclosable child resistant packaging in accordance with Title 16 C.F.R. 1700 of the Poison Prevention Packaging Act.

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.

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