



Washington State
Liquor and Cannabis Board

Date: June 18, 2025

To: Jim Vollendroff, Board Chair
Ollie Garrett, Board Member
Pete Holmes, Board Member

From: Denise Laflamme, Policy and Rules Coordinator

Copy: Will Lukela, Agency Director
Toni Hood, Agency Deputy Director
Larry Grant, Director of Enforcement and Education
Becky Smith, Director of Licensing
Kevin Walder, Rules & Policy Manager

Subject: **Board approval to adopt final rules to amend WAC 314-55-015 to allow persons under 21 years of age (minors) on the licensed cannabis premises of producers and processors under certain conditions**

The Director's Office requests Board approval to file a CR-103 to adopt final rules to amend [WAC 314-55-015](#) to allow two groups of persons under the age of 21 on licensed cannabis premises of producers and processors provided certain conditions are met. These amended rules will be effective July 19, 2025.

The Board has been briefed on the rule development background and public comments received on this rulemaking. The CR-103 memorandum, CR-103 form, concise explanatory statement, and final rules for adoption are attached.

If final rules are approved for filing, the concise explanatory statement will be sent to any person upon request and stakeholders who submitted written comment or provided oral testimony on the rule proposal.

_____ Approve	_____ Disapprove	_____	_____
		Jim Vollendroff, Board Chair	Date

_____ Approve	_____ Disapprove	_____	_____
		Ollie Garrett, Board Member	Date

_____ Approve	_____ Disapprove	_____	_____
		Pete Holmes, Board Member	Date



CR 103 Memorandum

Allowing minors under the age of 21 on non-retail cannabis licensed premises

Date: June 18, 2025

Presented by: Denise Laflamme, Policy and Rules Coordinator

Background

In August 2022, the Board accepted two rulemaking petitions to amend [WAC 314-55-015](#) to allow certain minors on the premises of licensed cannabis producers and processors under specific conditions. One petition sought to codify an LCB temporary COVID allowance that permitted minors under 16 years of age on the licensed premises of cannabis producers and processors. The conditions for this allowance included that the minor was a child or grandchild of the licensee, was not engaged in any work or act of employment for the licensee's business, and did not possess any products associated with the production, processing, or sales of cannabis. This allowance expired on December 31, 2022. The second petition requested that employees of contractors engaged in construction, electrical, plumbing, HVAC work, etc., who are under 21, be permitted on licensed premises of cannabis producers and processors, provided they are over the age of sixteen and not engaging in any work related to production, processing or sales of cannabis.

Under [WAC 314-55-015\(2\)](#), no one under 21 years of age may enter or remain on cannabis licensed premises except as provided in [RCW 69.50.357](#), which allows qualifying patients under 21 years of age on the premises of retail outlets only, under certain conditions. Statute explicitly prohibits the delivery, sale, or possession of cannabis products to persons under 21 years of age but does not prohibit persons under 21 years of age to enter or remain on the licensed premises of a producer or processor. The Board has broad statutory authority to adopt rules that regulate producer and processor licenses as provided in RCW 69.50.325, RCW 69.50.342, and RCW 69.50.345.

A CR 101 was filed on February 28, 2024 ([WSR 24-06-026](#)) that initiated rulemaking. Proposed rule language was filed with CR 102 on January 15, 2025 ([WSR 25-03-081](#)). Based on feedback received during the public comment period following the CR 102, a Supplemental CR 102 was filed on April 23, 2025 ([WSR 25-09-166](#)), with revised proposed rule language. A public hearing on the proposed rule language filed with the Supplemental CR 102 was held on June 5, 2025.

Rule Necessity

These rule changes are being made as a result of two rulemaking petitions accepted by the Board in 2022. One petition sought to make permanent an allowance LCB had in place during COVID that permitted children and grandchildren of cannabis licensees on the licensed premises of producers and processors under certain specific conditions. The second petition sought to extend a similar allowance to employees of contractors under 21 years of age. LCB had received widespread support for this rulemaking from stakeholders.

Public Engagement

Prior to filing the CR 101, rules staff reached out to the petitioner asking if they remained supportive of initiating this rulemaking. The petitioner responded that yes, they were still supportive. Subsequently, LCB rules staff received over 50 emails from people in support of rulemaking related to these petitions prior to filing the CR 101.

After filing the CR 101, an LCB project team was convened to discuss and develop draft rules. The project team included representation from the Attorney General's Office, Enforcement & Education division, the Licensing division, and the public health education liaison.

Two virtual stakeholder engagement sessions were held on Monday, September 16, and Thursday, September 19, 2024. A [Powerpoint presentation](#) with background information and conceptual rule elements, including draft conditions, was posted on the LCB rule webpage for discussion at these sessions. An invitation and links to session materials was sent out via a [Gov delivery](#) notice on September 5, 2024. The stakeholder sessions were recorded. Transcripts of these sessions with their attendance lists are included as an attachment in the [CR 102 memo](#) dated January 15, 2025.

In order to obtain feedback on draft rule language prior to filing the CR 102, a [Gov delivery](#) notice was sent out on November 20, 2024 requesting public feedback on draft rules. Draft rules were posted on the LCB webpage with a deadline of December 6, 2024, for comments.

During the public comment period following the filing of the CR 102 on January 15, 2025, LCB received nineteen written comments via email and four oral comments provided during a regular Board meeting on January 15, 2025. Additionally, four people provided oral comments during the public hearing on February 26, 2025. Based on public comments received on proposed language with the CR 102, as well as subsequent direction from the Board, agency staff revised several aspects of the proposed rules that resulted in revised proposed rule language included in a Supplement CR 102 approved by the Board on April 23, 2025.

A public hearing on the proposed rule language in the Supplemental CR 102 was held on June 5, 2025. LCB received three comments on proposed rule language during the public comment period through the day of the public hearing. These comments are provided in the Concise Explanatory Statement included with this memo.

Description of Rule Changes

Permanent rules with the CR 103 amend WAC 314-55-015.

Changes were made to rule language to add two groups of persons under 21 years of age allowed on cannabis licensed premises of producers and processors given specific conditions. These changes included amending 1 subsection and adding 3 new subsections.

Amends Subsection (2):

Adds definition of person to reference existing definition in RCW 69.50.101 and stipulates that persons under 21 years of age must not:

- (a) enter or remain the licensed premises of a cannabis licensee except as provided in new subsections (3) and (4) of this section.
- (b) possess any products associated with the production, processing, or sales of cannabis. Adds that violations are subject to the same penalties established for allowing persons under 21 years of age to frequent a retail licenses premises under WAC 314-55-525.

Adds new Subsection (3):

Persons under the age of 16 who are children or grandchildren of the licensees may enter or remain on the licensed premises of a cannabis producer or processor, provided:

- (a) The person does not enter or remain in areas where cannabis is present including, but not limited to, those areas where cannabis is grown, dried, cured, trimmed, processed in any manner, stored, or being prepared for shipment, unless accompanied by and under the direct supervision of the licensee.
- (b) The licensee is on the licenses premised at all times while their child or grandchild is present.

Adds that violations of this subsection are subject to the same penalties for failure to maintain required surveillance system under WAC 314-55-522.

Adds new Subsection (4):

A licensed producer or processor may allow a person under 21 years of age to enter or remain on the licensed premises under the following conditions:

- (a) The person under 21 years of age is:
 - (i) At least 18 years of age.
 - (ii) Employed by a licensed plumbing contractor, electrical contractor, or a contractor registered with the Washington state Department of Labor and Industries.

- (iii) On the licensed premises only during the course of their official employment and does not remain on the premises any longer than is necessary to perform duties associated with their employment.
- (iv) Accompanied at all times by either:
 - (A) a supervisor who is employed by the same licensed or registered contractor and who is at least 21 years of age; or
 - (B) a general contractor with supervisory authority and control over the workplace who is at least 21 years of age.
- (b) In addition to requirements under WAC 314-55-083, including wearing an identification badge while on the premises, licensees must record the following information about employees of contractors in the visitor log:
 - (i) If the employee is under 21 years of age; and
 - (ii) The name of contractor business for whom employee is engaged in work while on the licensed premises.

Adds new Subsection (12)

Specifies that nothing in this section conflicts with RCW 9.41.300 as the entire premises remain classified as off-limits to persons under 21 years of age from the general public.

All specific changes and a comparison of changes made between the CR 102 and Supplemental CR 102 are listed in the [Supplemental CR 102 memo](#).

Difference between the proposed rules (Supplemental CR 102) and final rules (CR 103): No changes were made.

Rule Implementation (RCW 34.05.328(3)(a))

Informing and Educating Persons Impacted by the Rule (RCW 34.05.328(3)(b))

To help inform and educate persons impacted by the rule, the LCB will:

- Email notice with the adoption materials to persons who commented on the rules, the rule making and licensee distribution lists, and the general LCB GovDelivery list.
- Post rule adoption materials, including final rule language, response to comments, final analysis (Concise Explanatory Statement), and any other relevant documents on the rulemaking webpage for public access.

Promoting and Assisting Voluntary Compliance (RCW 34.05.328(3)(c))

LCB will promote and assist voluntary compliance through technical assistance.

- LCB staff are available to respond to phone and email inquiries about the rules.
- Agency leadership and staff have actively participated in rule development and revisions and are familiar with the final product. Internal and external education efforts to share knowledge and assure consistent application of rule will be supported.

- Rule and guidance documents will be available on the LCB website.
- LCB will use available and customary resources to disseminate materials and information to all persons impacted by the rules.

These actions are designed to inform and educate all persons impacted by the rules to support and promote voluntary compliance.

Training and Informing LCB Staff

Several LCB staff responsible for implementing these adopted rules work directly with impacted parties and are already familiar with the nuances of the rule changes. Additional internal guidance documents may be prepared as necessary. The LCB will also consider:

- Provision of internal and external training and education, as needed. potentially including webinars, training, and videos if appropriate.
- Coordinating and centrally locating decisions to assure consistency between agency, staff, and industry.

Rule Effectiveness Evaluation (RCW 34.05.328(3)(d))

After the rule becomes effective, the LCB will evaluate the effectiveness of this rule in the following ways, including but not limited to:

- Monitoring questions received after the effective date of this rule, and adjusting training and guidance accordingly.
- Monitoring the number of enforcement actions, including type, resolution, and the outcome.
- Monitoring the number of requests for rule language revisions or changes.
- Monitoring the number of requests for rule interpretation.
- Monitoring licensee feedback including, but not limited to, the number of requests for assistance.



RULE-MAKING ORDER

PERMANENT RULE ONLY

CR-103P (December 2017)
(Implements RCW 34.05.360)

CODE REVISER USE ONLY

Agency: Washington State Liquor and Cannabis Board

Effective date of rule:

Permanent Rules

- ☒ 31 days after filing.
☐ Other (specify) _____ (If less than 31 days after filing, a specific finding under RCW 34.05.380(3) is required and should be stated below)

Any other findings required by other provisions of law as precondition to adoption or effectiveness of rule?

- ☐ Yes ☒ No If Yes, explain:

Purpose: The Washington State Liquor and Cannabis Board (LCB) has amended WAC 314-55-015 to allow persons under 21 years of age (minors) on the licensed premises of cannabis producers and processors provided certain conditions are met. This rulemaking is the result of two rulemaking petitions accepted by the LCB in 2022.

Citation of rules affected by this order:

New:
Repealed:
Amended: WAC 314-55-015
Suspended:

Statutory authority for adoption: RCW 69.50.325; RCW 69.50.342; RCW 69.50.345

Other authority:

PERMANENT RULE (Including Expedited Rule Making)

Adopted under notice filed as WSR 25-09-166 on April 23, 2025 (date).
Describe any changes other than editing from proposed to adopted version: None.

If a preliminary cost-benefit analysis was prepared under RCW 34.05.328, a final cost-benefit analysis is available by contacting:

Name: Denise Laflamme, Rules & Policy Coordinator
Address: 1025 Union Avenue SE, Olympia WA 95501
Phone: 360-819-0452
Fax: 360-664-3208
TTY:
Email: rules@lcb.wa.gov
Web site: www.lcb.wa.gov
Other:

**Note: If any category is left blank, it will be calculated as zero.
No descriptive text.**

**Count by whole WAC sections only, from the WAC number through the history note.
A section may be counted in more than one category.**

The number of sections adopted in order to comply with:

Federal statute:	New	_____	Amended	_____	Repealed	_____
Federal rules or standards:	New	_____	Amended	_____	Repealed	_____
Recently enacted state statutes:	New	_____	Amended	_____	Repealed	_____

The number of sections adopted at the request of a nongovernmental entity:

New	_____	Amended	_____	Repealed	_____
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The number of sections adopted on the agency's own initiative:

New	_____	Amended	<u>1</u>	Repealed	_____
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The number of sections adopted in order to clarify, streamline, or reform agency procedures:

New	_____	Amended	_____	Repealed	_____
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The number of sections adopted using:

Negotiated rule making:	New	_____	Amended	_____	Repealed	_____
Pilot rule making:	New	_____	Amended	_____	Repealed	_____
Other alternative rule making:	New	_____	Amended	<u>1</u>	Repealed	_____

Date Adopted: June 18, 2025

Name: Jim Vollendroff

Title: Board Chair

Signature:

Place signature here



Notice of Permanent Rules Regarding Allowing Minors on Non-retail Cannabis Premises Rulemaking

Concise Explanatory Statement

This concise explanatory statement concerns the Washington State Liquor and Cannabis Board's (LCB) adoption of rule amendments to [WAC 314-55-015](#) to allow minors on non-retail cannabis premises under certain, limited conditions.

The Administrative Procedure Act ([RCW 34.05.325\(6\)](#)) requires agencies to complete a concise explanatory statement before filing adopted rules with the Office of the Code Reviser. The concise explanatory statement must be provided to any person upon request, or from whom the LCB received comment on the proposed rules.

The LCB appreciates and encourages your involvement in the rule making process. If you have questions, please e-mail at rules@lcb.wa.gov.

Background and reasons for adopting these rules:

Under [WAC 314-55-015\(2\)](#), no one under 21 years of age may enter or remain on cannabis licensed premises except as provided in [RCW 69.50.357](#), which allows qualifying patients under 21 years of age on the premises of retail outlets only, under certain conditions. Statute explicitly prohibits the delivery, sale, or possession of cannabis products to persons under 21 years of age but does not prohibit persons under 21 years of age to enter or remain on the licensed premises of a producer or processor. The Board has broad statutory authority to adopt rules that regulate producer and processor licenses as provided in RCW 69.50.325, RCW 69.50.342, and RCW 69.50.345.

In August 2022, the Board accepted two rulemaking petitions to amend WAC 314-55-015 to allow certain minors on the premises of licensed cannabis producers and processors under specific conditions. One petition sought to codify an LCB temporary COVID allowance that permitted minors under 16 years of age on the licensed premises of cannabis producers and processors. The conditions for this allowance included that the minor was a child or grandchild of the licensee, was not engaged in any work or act of employment for the licensee's business, and did not possess any products associated with the production, processing, or sales of cannabis. This allowance expired on December 31, 2022. The second petition requested that employees of contractors under the age of 21 who are engaged in construction, electrical, plumbing, HVAC, and other similar types of activities be permitted on the licensed premises of cannabis producers and processors to conduct work.

A CR-102 was filed on January 15, 2025 ([WSR 25-03-081](#)) with proposed rule changes. A Supplemental CR-102 was filed on April 23, 2025 ([WSR 25-09-166](#)) with revised proposed rules that incorporated comments received during the public comment period on the initial proposed rules filed on January 15, 2025.

All comments received on the Supplemental CR-102 proposed rules are listed below. The public hearing on the Supplemental CR-102 proposed rules was held on June 5, 2025. The Board received three public comments on the rule proposal in the time between the filing of the Supplement CR 102 and the public hearing on June 5, 2025. These comments include two written comments, and one oral comment provided at the public hearing.

Rulemaking history for this adopted rule:

CR-101 – filed February 28, 2024, as WSR #24-06-026

CR-102 – filed January 15, 2025, as WSR #25-03-081

- Public hearing held February 26, 2025

Supplemental CR-102 – filed April 23, 2025, as WSR #25-09-166

- Public hearing held June 5, 2025

The effective date of this amended rule is July 19, 2025.

Three public comments were submitted on the rule proposal in the time leading up to, and including the day of the public hearing. Comments received on proposed rules filed with the Supplemental CR-102:

1. From shellies4@netzero.com on 4/24/25 via email:

Dear Board,

Thank you for all you do! I would like to put in public Comments in regards to the children on non retail cannabis places. I totally AGREE that kids should be allowed.

They learn about many kinds of farming for not just cannabis but how to grow all kinds of plants including FOOD! I guess you could always add that at least 1 other crop of food plants must be grown too? I think every child should have an 8x8 bed to grow whatever they want!

Anyway, yes kids live on farms and there isn't a good enough reason for them to NOT be there!

We should also go back to commercial Hemp for lots of other products!

Thank you for considering my comments!

Have an amazing day! Thank you for all you do!!

LCB response: The LCB appreciates and acknowledges all stakeholder feedback. The agency has not incorporated this suggestion into the final rule language for the following

reasons: The suggestion is in support of the rulemaking and doesn't require changes. The suggestion related to hemp is outside the scope of this rulemaking.

Was the comment reflected in the adopted rule? No.

2. From Holli Lee Eriksen on 4/30/25 sent via U.S. Mail

RE- CR 102; WAC 314-55-015 Revision

Common sense should prevail. A legal industry should not be over regulated. If the over twenty-one substance OTC, and any age for prescription use for specific conditions: seizures, glaucoma, stomach upset, cancers, PTSD... Is not where the children are physically within reach, including affected air areas, why shouldn't the children be banned from operation locations, not the entire property location.

Eighteen to twenty-one year olds apprenticing in plumbing or electrical would be overseen by a professional who could decide whether they are mature enough to behave in a professional manner at a cannabis job site same as work at a bar or pub off open hours. Please read into the record. Holli Lee Eriksen, Fourth Generation Seattlite

LCB response: The LCB appreciates and acknowledges all stakeholder feedback. The agency has not incorporated this suggestion into the final rule language for the following reasons: These suggestions are already incorporated into the proposed rules.

Was the comment reflected in the adopted rule? No.

Oral testimony was received during the public hearing held on June 5, 2025.

1. Caitlein Ryan

Thank you, Mr. Walder.

My name is Caitlin Ryan and I'm the executive director for the Cannabis Alliance and I'm here today to just say that we appreciate the changes that have been reflected in the supplemental rulemaking, especially the inclusion of processor premises, a clarification around supervision in areas that contain cannabis and the removal of the requirement to notify the board prior to a child's presence.

These adjustments show that you have listened to the real concerns raised by working families in this industry and taking meaningful steps towards a more workable policy. As this rule making has gone on, I have spoken to over 100 farms over the last year about this and family farm owners have long demonstrated their commitment to safety and responsible farming practices. Imposing additional hurdles only increases the risk of accidental non-compliance and places unnecessary burdens on already hard-working families. Additionally, the previous rules placed a disproportionate burden on small and women owned businesses, many of whom face unique challenges and balancing family and work responsibilities while sustaining their operations.

And again, just you to know, as someone who has worked in this industry for over a decade and as a parent, I understand the balance that we have to strike. Protecting children is not just important to us, it's fundamental. Parents in the cannabis industry are often hypervigilant because we know what's at stake. Many of us have lived under the threat of losing our children because of the work we do, even when that work is entirely legal. We are extremely cautious and truly the worst thing that could happen to any of our businesses would be for a child to be harmed, not just to our business, obviously that'd be awful regardless, or gain access to cannabis and have that go out there into the world that way. We are deeply motivated to ensure that that never happens.

That's why these changes matter. So removing this advance notice is more than a convenience, it just reflects a real understanding of how parenting works. That childcare emergencies don't follow a schedule, and policies that account for that reality help parents meet their responsibility without sacrificing safety or compliance.

I would like to note, however, and perhaps this is for further rule making on down the road that there is still a little bit of work to be done. Limiting this allowance to licensees' children only and grandchildren, and excluding the children and grandchildren of employees, sort of does create a bit of an unfair double standard. Many small farms rely on dedicated employees for just as responsible, just as careful and just in need of just as much in need of flexibility as the licensees themselves. So we would like to urge you to consider this in the future. Especially because we just also would like to again put on the record that while this was in place during the temporary COVID-19 allowance, which lasted, I believe, 18 months, maybe even longer than that, farms were permitted to have children on site, and that system worked and there were no widespread issues, no pattern of safety failures, and that track record should be recognized and built upon.

We again want to commend you for this adjustment and look forward to the passage of this rule set. Thank you for your time.

LCB response: The LCB appreciates and acknowledges all stakeholder feedback. The agency has not incorporated these comments into the final rule language for the following reasons: Most of these comments are included in the proposed rules. Allowing children and grandchildren of employees of cannabis producers and processors is outside the scope of this rulemaking.

Was the comment reflected in the adopted rule? No.

Were any changes made between the proposed rules in the Supplemental CR 102 and final adopted rules? No.

WAC 314-55-015 General information about cannabis licenses. (1)

To be issued and maintain a license to produce, process, or sell cannabis at retail, a person or entity applying for a cannabis license must meet all of the qualifications described in this chapter.

(2) All applicants, licensees, and employees working in each licensed establishment must be at least 21 years of age. ~~((No one))~~ Persons, as defined in RCW 69.50.101, who are under 21 years of age ((may)) must not:

(a) Enter or remain on ((a cannabis)) the licensed premises of a cannabis licensee except as provided in RCW 69.50.357 or as provided in subsections (3) and (4) of this section.

(b) Possess any products associated with the production, processing, or sales of cannabis. Violations of this subsection are subject to the same penalties established for allowing persons under 21 years of age to frequent a retail licensed premises under WAC 314-55-525.

(3) Persons under the age of 16 who are children or grandchildren of the licensees may enter or remain on the licensed premises of a cannabis producer or processor, as provided in this subsection. Violations of this subsection are subject to the same penalties established for failure to maintain required surveillance system under WAC 314-55-522.

(a) The person does not enter or remain in areas where cannabis is present including, but not limited to, those areas where cannabis is grown, dried, cured, trimmed, processed in any manner, stored, or being prepared for shipment, unless accompanied by and under the direct supervision of the licensee.

(b) The licensee is on the licensed premises at all times while their child or grandchild is present.

(4) A licensed producer or processor may allow a person under 21 years of age to enter or remain on the licensed premises under the conditions outlined in this subsection.

(a) The person under 21 years of age is:

(i) At least 18 years of age.

(ii) Employed by a licensed plumbing contractor under chapter 18.106 RCW, or licensed electrical contractor under chapter 19.28 RCW, or a contractor registered with the Washington state department of labor and industries as required under chapters 18.27 RCW and 296-200A WAC.

(iii) On the licensed premises only during the course of their official employment providing contracted services to the licensee and does not remain on the premises any longer than is necessary to perform duties associated with their employment.

(iv) Accompanied at all times by either:

(A) A supervisor who is employed by the same licensed or registered contractor and who is at least 21 years of age; or

(B) A general contractor with supervisory authority and control over the workplace who is at least 21 years of age.

(b) In addition to requirements under WAC 314-55-083, including wearing an identification badge while on the premises, licensees must record the following information about employees of contractors in the visitor log:

(i) If the employee is under 21 years of age; and

(ii) The name of contractor business for whom employee is engaged in work while on the licensed premises.

~~((+3))~~ (5) Mandatory signs must be conspicuously posted at all cannabis licensed premises consistent with the requirements in WAC 314-55-086.

~~((+4))~~ (6) The privileges of a board issued cannabis license may be used only after the board issues official written approval.

~~((+5))~~ (7) The board will not approve an application for a cannabis license under any of the following circumstances:

(a) The proposed cannabis location would limit law enforcement access without notice or cause, including a personal residence;

(b) The proposed cannabis business would be located on federal lands;

(c) The proposed cannabis business would be located within the exterior boundaries of the reservation of a federally recognized tribe without the express written consent of the tribe consistent with WAC 314-55-020(4).

(d) The application for a cannabis retail license is located within another business unless that other business is a research license as described in WAC 314-55-073. More than one license may be located in the same building if each licensee has their own area separated by full walls with their own entrance, or if the same business entity holds a producer license and a processor license at the same location under a single license number. Product may not be commingled.

~~((+6))~~ (8) The board may impose special conditions to an approval for a cannabis license. Special conditions include, but are not limited to, involvement of any former licensee in the operations of the licensed business, their former employees, or any person not qualifying for a cannabis license.

~~((+7))~~ (9) All cannabis licensees must conspicuously post and keep posted its license, or licenses, and any additional correspondence issued by the board describing special conditions.

~~((+8))~~ (10) A cannabis licensee must use sanitary practices in the production, processing, storage, and sale of all cannabis products.

~~((+9))~~ (11) Cannabis licensees may not allow the consumption of cannabis or cannabis-infused products on or within the licensed premises.

(12) Nothing in this section conflicts with RCW 9.41.300 as the entire premises remain classified as off-limits to persons under 21 years of age from the general public.