



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.