

**Session I**

Marijuana Quality Assurance & Product Testing Rules Comments

Comments from spring 2019 listen & learn forum

Public comments on:

[**WAC 314 55 1025 Lab Proficiency Testing 1**](file:///C:\Users\sdavi195\Desktop\WAC%20314%2055%201025%20Public%20Comment3.docx#_Toc11138785)

[**WAC 314 55 101 Quality Assurance Sampling Protocols 8**](file:///C:\Users\sdavi195\Desktop\WAC%20314%2055%201025%20Public%20Comment3.docx#_Toc11138786)

[**WAC 314 55 102 Quality Assurance Testing 25**](file:///C:\Users\sdavi195\Desktop\WAC%20314%2055%201025%20Public%20Comment3.docx#_Toc11138787)

[**General Comment 47**](file:///C:\Users\sdavi195\Desktop\WAC%20314%2055%201025%20Public%20Comment3.docx#_Toc11138788)

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| **Source** WAC 314 55 1025 Lab Proficiency Testing | **Commenter** | **WAC Reference** | **Theme** | **Comment** | **Date Received** |
| Email | Marilyn Olson | N/A | Lab cert schedule PT testing Reference testing End product testing | Thank you for the work session yesterday, Cannabis Quality Assurance Testing Rules work session. It is a step in the right direction but so much more needs to discussed and remedied. At times it feels as though the goal of the WSLCB is to eliminate cannabis businesses rather than work through the issues. Below are a few points i would like to have noted in an effort to move to both preserve public safety and allow I502 businesses to stay profitable. • Laboratory inspection/certification schedule- The annual certification/inspection requirement is excessive in comparison to other analytical laboratory's. Environmental and medical laboratory requirement (Usually every 3 years or upon issue) • The Inspection/certification institutions should be within the state or at least the trips from another state should be limited (perhaps conducting 3-4 audits while in Washington rather than 1) This year our cost was over $8,000 for visit from RJ Lee out of PA. As well, 2 proficiency testing rounds per year brings us to over $12,000 in additional annual running costs. Most analytical laboratory's perform proficiency's once a year after passing 3 rounds. Cannabis Laboratory requirements should not be more stringent. • Reference testing should ALWAYS be allowed. This assures laboratory's the ability to utilize another lab if they have an equipment issue, need to shutdown instrument for maintenance ect. This is a normal practice within laboratory's in other fields of testing including medical testing. • Prior to adding analysis an impact study should be done as well as full disclosure on how many samples will be utilizing this additional test. The addition of pesticides is easily over a million dollar investment while metals/ventilation/extraction requirements easily $250,000. Testing per farm could benefit the growers following the rules (less testing) while costing the farms not following the requirements more money on testing. • To protect consumers, final products especially edibles should be tested for microbiological hazards (ENTC, Salmonella & E.Coli at least)   We are happy to work with you and other cannabis businesses to ensure the stability of the industry as well as support a safe product for consumers. | 4/9/2019 |
| Email | J. Burns/Treeline Analytics | WAC 314-55-1025(5)(b) | Certification/PT | PT's are scheduled by the vendors and out of control of the labs. | 4/4/2019 |
| Email | J. Burns/Treeline Analytics | WAC 314-55-1025(7) | Failure of PT Report of false negative | This should also be applied to pesticides based on the Smith et al. report showing 78% false nagatives on pesticide testing (B.C. Smith, P. Lessard, and R. Pearson, *Cannabis Science and Technology* 2(1), 48-53 (2019)). | 4/4/2019 |
| Email | J. Burns/Treeline Analytics | WAC 314-55-1025(9) | Management of PT samples | This is not always possible base don the format, matrix and sample size of PT samples provided by vendors. Language should be adjusted to indicate the lab must follow SOP as much as possible, and when not in conflict with guidance of PT provider. | 4/4/2019 |
| Email | Matt Heist/Green Grower Labs | WAC 314-55-1025 | PT Testing Frequency | We agree with the idea stated during the meeting concerning PT testing dropping to once a year after 3 consecutive passes. | 4/10/2019 |
| April 9 Live Comment | Amber/Medicine Creek Analytics | WAC 314-55-1025 | PT in matrix Blind PT testing Recall | Proficiency tests should be done in matrix. And should be blind tests. WSDA contract-what is actually happening with that and how is it factoring in. Need very clear Recall process with enforcement | 4/9/2019 |
| April 9 Live Comment | Shawn DeNae | WC 314-55-1025 | Standardized testing | Need one list. Every agency has their list and LCB too. Need one list. Need harvest testing, but not so cumbersome – all to the lab at the same time. Honor system. Random at the finished product end. Need labeled “pest free” should be tested | 4/9/2019 |
| April 9 Live Comment | Jeff/Capital Analysis | WAC 314-55-1025 | Baseline for testing | Important to have a base when testing. Use a bell curve method to have labs use. Should be blind and not blind. Every sample should be the same regardless of which test. We need defensible data. Need a system that supports us in court | 4/9/2019 |
| April 9 Live Comment | Camilla Paine | WAC 314-55-1025 | PT in matrix | PT’s should be a matrix. After 3 good tests, should go to annual. | 4/9/2019 |
| April 9 Live Comment | Jim MacCrae/Straighline Analytics | WAC 314-55-1025 | Blind testing Recall | Don’t like that “board” is not capitalized. If you let the farmers test, product may be biased. Can you do the job when you are being watched? Blind testing off the shelf to make sure the labs are kept honest. Strengthen Recall and use it. | 4/9/2019 |
| April 9 Live Comment | Jed Haney/Lab Guild | WAC 314-55-1025 | Blind PT testing | Lab testing. If not blind, can’t depend on labs honesty. Emphasize blind PT | 4/9/2019 |
| April 9 Live Comment | Thomas Jay | WAC 314-55-1025 | Potentcy testing = NO Pesticide screening = YES Heavy metals screening = YES Terpenes = NO | PT: potency analysis is marketing. Not a patient safety issue. Potency is random – 10-20% variation. 100% testing for pesticide. Save the testing for heavy metals rather than terpenes. | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | N/A | Board should be capitalized | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | PT in matrix | Proficiency tests in matrix, blind (two attendees offered this) | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | WSDA contract | Can WSDA be used? What is happening with the WSDA contract? | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | Recall | Recall procedure and enforcement | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | Standardized testing | One testing list | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | Harvest lot | Harvest size for testing | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | End product testing | Honor system/random finished product testing | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | End product testing | Back-up labeling with test - emergency rule | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | Blind PT testing | Blind testing (PT) | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | Data | Defensible data | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | PT in matrix | PT's in matrix, then decrease to one per year | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | Sample qualty | Sample integrity | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | Cost | Use current resources to test for integrity | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | Recall | Strengthen recall process | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | Blind PT testing | Blind PT | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | Test results | Available test results | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | N/A | Invitations to all licensees and labs | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-1025 | N/A | Highly repeatable testing | 4/9/2019 |

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| **Source** WAC 314 55 101 Quality Assurance Sampling Protocols | **Commenter** | **WAC Reference** | **Theme** | **Comment** | **Date Received** |
| Email | Alex Kaulins | None provided, but comments speak generally to WAC 314-55-102 | Pesticide screening= YES Heavy metal screening = YES Increased cost Random testing Terpenes = NO | Hi guys. I'm a 502 producer/processor and just received your email with drafted rule changes for QA Testing. I have some feedback for you to consider. While I strongly support the added requirement of pesticide and heavy metal testing by licensees, you guys aren't in touch with the reality of how expensive these tests are. 1. First of all, as of today, there are zero labs approved to test for heavy metals. These policies for heavy metals should not go into effect until there are at least two approved labs that way theres some price competition to keep our testing costs down. For clarity, a heavy metal and pesticide test together cost >$300 whereas a potency/micro/myco/residual test is currently ~$100. So to be clear, your new rules may double the flower lot size to 10 pounds, but quadruple our testing costs to >$400 per lot. 2. The WSLCB would be much better off conducting random pesticide and heavy metals tests of all the top 200 processors in the state. You honestly should purchase their products in stores and submit it for testing yourselves. Putting testing in the hands of processors is simply a mistake. The only way to keep processors honest is to test product that they didn't know was going to be tested. It's that simple. 3. I don't see any reason to force processors to pay for terpene tests if they choose to infuse additional terpenes. A molecule, is a molecule, is a molecule. Google it. It's what people in chemistry say and there's a reason for it. A myrcene molecule is the exact same whether it was derived from a mango or a cannabis plant. You should not be creating extra testing (and therefore cost) requirements on our low-margin industry without valid scientific reasoning, and your terpene testing rules just don't make sense. I'd love to talk more about this with anyone who cares. | 3/21/2019 |
| Email | J. Burns/Treeline Analytics | WAC 314-55-101 | Sampling protocol accuracy Lot size increase = NO | Sampling protocol is inaccurate. Specifically, Section 3b should be better defined, with the current vauge language removed. The sampling of 4 grams from a 10lb lot will produce a QA sample that is statistically insignificant for the protection of the public. Due to analytical error, sampling error and natural variation of the cannabis plant, lot size should be reduced from the current 5lb limit, not increased or QA sample size increased. | 4/4/2019 |
| Email | J. Burns/Treeline Analytics | WAC 314-55-101 | Sampling protocol accuracy | Due to the above concerns, it is impossible for labs to determine in a QA sample was collected improperly. Likewise, there is no process, either through request of documentation or history or enforcement that the lab can determine the quality of the sample. | 4/4/2019 |
| Email | Matt Heist/Green Grower Labs | None provided, but comments speak generally to WAC 314-55-101 | Lot size increase = NO | Regarding the proposal to increase lot size, the proposal is in direct contradiction to each of the other points regarding increased testing for public health safety, e.g. pesticides and heavy metals. Such an increase in lot size has to [the] potential to increase testing variance on an order of magnitude. | 4/10/2019 |
| Email | Steven McCombs/MC2 Supply | None provided, but comments speak generally to WAC 314-55-101 | Sampling protocol accuracy Sample by strain/ harvest | If the final rules uses the 'Honor System' for obtaining samples for testing then this is not s true random sampling systems. So why should the sample size be large? I request that the size lot from which smples are pulled from be by strain by a days harvest amount for all products except concentrates. Concentrates should be tested per 'Batch Ran or Processed' in the process. | 4/9/2019 |
| Email | Crystal Oliver/WSIA | None provided, but comments speak generally to WAC 314-55-101 | Lot size increase = YES Lot size by strain/harvest Pesticide screening = NO Heavy metal screening = NO | We would like to see lot size further increased, or better yet see farmers given more flexibilty in defining their own lot size based on strain & harvest when it comes to Cannabinoid Concentration testing. (We DO NOT support level testing for pesticides or heavy metals) We could easily increase sample size to address any of the concerns expressed by labs with regard to lot size increases. | 4/10/2019 |
| Email | John Kingsbury | None provided, but comments speak generally to WAC 314-55-101 | Lot size = DOH determines | **Lot size.** Along with the idea of checking with DOH about product claimed to "meet the needs of patients", lot size changes regarding product that "meets the needs of patients" should be discussed with DOH.  It may be that this would be a good time for DOH to reconsider their testing lot sizes.   That is definitely a discussion that LCB and DOH should have during this process. | 4/11/2019 |
| Email | Fred Brader/Orgrow LLC | None provided, but comments speak generally to WAC 314-55-101 | Lot size increase = YES Equivalent total weight harvested | On lot sizes for testing.  It is being proposed to increase the lot from 5 lbs to 10 lbs.  I would suggest it say 10 lbs. OR the equivalent of the total weight harvested of any given strain on the same day.  For instance, a grower may plant 200 plants indoor or possibly 100 plants outdoor and grow them identically with birth dates on the same day and harvest dates on the same day.  All parts of this harvest should be the same and if samples are taken by quadrant as required then the test would be representative of the entire harvest of a specific strain.  Requiring a test for every 10 lbs. causes additional costs to the producer and down the road at the retailer, it causes inventory traceability problems when switching between test lots of the same exact material.  When formulating rules and laws, please ask yourself if you would support legislation that would treat a Cannabis producer differently than say a winery.  Do we require a winery to test every 5 or 10 gallons of wine when it is made in a 1000 gallon tank? | 4/15/2019 |
| Email | Luke Hunter/Harmony Farms | WAC 314-55-101(2)(a) | Sampling protocol accuracy Random end product sampling | The current intention of this section seems to strive for a truly representative sample to represent the entire lot of cannabis. We believe that putting the responsibility on labs to check for adulterated samples is putting a unwarranted strain on a branch of this industry that is rather poorly regulated. I do not mean to put labs down as I believe that most labs are doing their best to operate under the intended regulation, although the WSLCB doesn’t hold the same grasp over their business as other branches of this industry (producer/processor/retail). A lab that receives penalty resulting in their certification being revoked, is still able to open another business where the rest of the industry is not held to that same standard (we loose our license and we cannot get another license). Back to the point there isn’t a driving force or incentive for a lab to report adulterated samples as this would result in Producer/Processor to stop utilizing them. I would offer that having randomized end product samples tested at the WSDA lab to test for congruency with advertised values would be a better means to assure that licensees are in compliance. To define “congruency” I am getting at a licensee that advertises that they are selling a product at “X” total cannabinoid value and the test results come in at something greater or less than the standard margin of error meaning there was adulteration of the original sample. | 4/10/2019 |
| Email | Luke Hunter/Harmony Farms | WAC 314-55-101(2)(c) | Sampling protocol | This section seems to prescribe a standardized manor of taking samples to assure their clean and not contaminated. I believe this section is overly prescriptive and it is in the best interest of the Producer/Processor to provide clean samples. I would like to see this section change to describe the intended outcome of taking samples such as: “Samples must be collected in a sanitary manor and must not receive contamination from an outside source to the sample as to maintain purity”. | 4/10/2019 |
| Email | Luke Hunter/Harmony Farms | WAC 314-55-101(3)(a) | Scaling or grading lots | This section is where the lot size is defined for testing samples. I believe the ultimate issue that we will face here is not the individual lot size but how a lab sample is bound to a lot for sale on market. To explain that statement currently when we harvest a room we may end up with 35lbs of flower to be available for market, this gives us 7 5lb lots that will all receive different potency numbers that can range on average around +/- 5%. We then have stores requesting to purchase from specific lots rather than buying a strain. This model is somewhat sustainable in a closed Washington market, although we are in an era where as a state we need to prepare for interstate commerce. The organization of selling multiple sub-sku’s of the same parent sku (in this case just buying a strain of cannabis) at a larger scale becomes an unnecessary pain point when an average of several lots would be in fact a better representation of the THC/CBD percentage in the packaged product going to the consumer. This would lead to a possible solution similar to removing specific cannabinoid concentration and inputting a gradation such as, Grade A = >25%, Grade B = 25%-20%, Grade C = 19%-15%, Grade D = 14-10%, Grade E = <9% (these numbers are just an example not necessarily recommended). In this model the Producer/Processor would then take each lot that falls into a gradation and then combine them for sale. So for the sake of clarity a Producer/Processor harvests a crop of the same strain and they get 50lbs of useable cannabis from it this would result in 10 5lb lots, lets say that 8 of those lots fall into the “Grade B” standard above and 2 lots fall into the “Grade A” standard, for the sale of this product they would then combine all the Grade A product into one lot and all of the Grade B product into one lot. This results in 2 sub-sku’s or “lots” to keep track of in traceability and for sale rather than 10. This is all from our perspective as an indoor farm taking this model to an outdoor farm where a harvest can consist of several hundred pounds of flower would greatly increase the need for combining similarly graded product. In the model described we have small batch testing (not hurting lab revenue), but globalizing and averaging the product after the fact, resulting in granular testing and better cannabinoid profile representation to the consumer. | 4/10/2019 |
| Email | James Dusek/James Downtown CC | None provided, but comments speak generally to WAC 314-55-101 | Lot size increase= YES (20 lb) | Lots should be a running lot meaning you harvest plants until the 10lbs (I would recommend 20 lbs) are reached. We don’t harvest 10lbs at a time as we are a perpetual grow and harvest small lots from the same room with the same growing conditions weekly or biweekly. This keeps the product fresh to the customers. | 4/9/2019 |
| April 9 Live Comment | Shawn DeNAe | WAC 314-55-101 | Sampling protocol accuracy | Rep samples: 6 pt spread from top to bottom-should be allowed to test best bud. THC .00- don’t like. Not specific amount but a series of ranges. | 4/9/2019 |
| April 9 Live Comment | Dani/GOAT Lab | WAC 314-55-101 | Lot size increase = NO | If you take the 5# lots and increase to 10# lots, will cut revenue in half for labs. Equipment very expensive – already a low profit margin. Bring in in increments. Cost per gram. Be mindful of eco impact on vendors. High cost for labs to do test | 4/9/2019 |
| April 9 Live Comment | Jeff/Capital Analysis | WAC 314-55-101 | Lot size increase = NO | Chain of custody lacking to verifying batch. Without homogenization, the variation is high. Increase in lot sizes will increase the problems have. Variations in pesticides, etc. Use data driven policy. Do testing on several batches to get a range. Normalized report range. Will submit comments in writing | 4/9/2019 |
| April 9 Live Comment | Amber/Medicine Creek Analytics | WAC 314-55-101 | Sample end product Functioning traceability | Sample finished product, based on intermediate testing. Contamination can show up in packaging. Functioning traceability system needed. | 4/9/2019 |
| April 9 Live Comment | Lukas Hunter/Harmony Farms | WAC 314-55-101 | Terpenes = NO Increased cost | Acknowledgement of terpenes but not defined in WAC. Terpenes are stripped away in processing. Checking at every stage ups the cost. Retesting good. Policy to acknowledge retesting. Contact, repercussions, litigation/adjudication? Turnaround time issue to avoid delay to market. Clear process | 4/9/2019 |
| April 9 Live Comment | Camilla Paine | WAC 314-55-101 | Lot size increase = NO | Lab discretion to fail samples, good. No on lot size increase. Lowering percent could increase danger. 10 grams/10# lot | 4/9/2019 |
| April 9 Live Comment | Kyle Capizzi | WAC 314-55-101 | Lot size increase = NO Advisory committee | Overall commentary written. Changing sample size increases burden on all. Testing rules should be looked at by panel of SMEs. 3rd party sampling will help. Listed possibilities. Sample size. Scale based on lots. Don’t mix English and metric. Refer to other states for info. | 4/9/2019 |
| April 9 Live Comment | Jim MacCrae/Straighline Analytics | WAC 314-55-101 | Sampling protocol accuracy Cost | Good for consumer safety and trust. Good stronger language. If you choose to put burden of cost on profit. Chain of custody issues. Strong consequences for non-rep sample. Make it simpler. Best means quality, not mold, etc. Cost benefit of this is at the core. | 4/9/2019 |
| April 9 Live Comment | Jed Haney/Lab Guild | WAC 314-55-101 | Lot size increase = NO Sampling protocol accuracy Functioning traceability | Lot size, no. connected to everything else. Lab traceability system should be included. Harvest date should be on label. Retest within a certain time, if not sold. Edibles not shelf stable – 90 day retest. Sched of testing x per x lot connected to percent. 3rd party on failed test. Chain of custody. | 4/9/2019 |
| April 9 Live Comment | Crystal Oliver/WSIA | WAC 314-55-101 | Harvest testing No harvest date on label | Farmers can’t afford another increase. This should be written to not impact. Harvest testing, yes. Last change cost the farmers 50% more. Workgroup should include farmers. No harvest date. We worked to have it removed. Works against outside growers. | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Terpenes = YES | Appreciate that terpenes are acknowledged, but needs a definiton | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Retesting = YES | Like retesting process for false positives. | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Fail samples = YES | Like the ability of labs to exercise discretion to fail samples. | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Lot size increase = YES | Like the stronger language added regarding lot size | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Lot size increase = YES | Increase in lot size ok, but look at this closely. | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Lot size | Split into four pieces; THC @4.0 | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Lot size increase = NO | 10lb lot will cut lab revenue in half; high cost of us to do the test. | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Lot size increase = NO | Increase lot sizewill make it worse | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Terpenes = NO Increased cost | Terpene testing adds cost | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Lot size increase = NO | Dislike lot size increase | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Lot size increase = NO | Greater impact on small businesses; farmers cannot afford another increase | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Sampling protocol accuracy | Test the best bud | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Sampling protocol accuracy | Range - 16 - 22%; -10%/ 10 - 14%, 14 - 18%, 18%+ | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Phase in rules | Bring in rules incrementally | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Increased cost | Consider cost per gram | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Lot size increase = NO | Do not increase lot size for potentcy | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Use data | Data-driven policy (e.g. pesticide analysis) | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Ranges based on equip. | Create reporting ranges based off of equipment used | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | End product testing | Final packaged product is what is tested | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Functioning traceability | Traceabilty - functioning | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Retesting = YES | Clear policy/process for re-testing (what options do we have?) | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Retesting = YES | Quick turn around for false positives (i.e. one quick re-test) | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Lot size increase = YES | Increase QA sample size to 10 - at least 10grams per 10lb lot | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | 3rd party sampling | 3rd party sampling (could be licensed samplers, labs, etc.) (Two attendees suggested this option) | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Scale samping | Scale the sampling - 2 - 3- grams per kilo | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Consequences for non-compliance | Strong consequences for sampling if non-representative sample is provided | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | LIMS | LIMS needs to be mandatory | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Harvest date on label Retest date on label | Harvest date on label/retest date on label | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Testing schedule | Testing/schedule per lot | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | 3rd party validation | 3rd party validation/3rd party trained | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Lot size increase = NO Harvest testing | Not lot, but harvest testing | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Lot size increase = YES | Lot increase should go farther (farmers) | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | Advisory committee | Work group that includes farmers (reps for all of industry) | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-101 | No harvest date on packaging | No harvest date on package (farmers) | 4/9/2019 |

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| **Source** WAC 314 55 102 Quality Assurance Testing | **Commenter** | **WAC Reference** | **Theme** | **Comment** | **Date Received** |
| Email/Feedback Doc | Cannabis Alliance | WAC 314-55-102(1) | Subcontracting | Does subcontracting need to end? This updated document suggests there is an end date (unspecified) when all labs would need to be accredited for all tests. If services are inadequate for demand and accreditation reasonable, the market should deliver sufficient laboratory capacity. | 4/9/2019 |
| Email | J. Burns/Treeline Analytics | WAC 314-55-102(1)(a) | No potency values on labels | Inpact on labeling: The presentation of potency values as an absolute number that represents all product packaged from a tested lot is a misrepresentation of the analysis with no scientific justificaiton. We are unaware of any scientific measurement without an associated error. This labeling format provides the consumer with misleading information about their purchase and should be validated for consistency with the Washington State Consumder Protection Act (RCW 19.,86). | 4/4/2019 |
| Email | J. Burns/Treeline Analytics | WAC 314-55-102(1)(a)(iii) | Compound identification | It would be impossible for the certified lab to know if these compounds were added, or even know what to test for (e.g., delta 8). This rule seems difficult to impossible to enforce. Compounds that are required to be tested should be specified. | 4/4/2019 |
| Email | J. Burns/Treeline Analytics | WAC 314-55-102(1)e | Heavy metal screening | The unit µ/daily should be clarified. | 4/4/2019 |
| Email | J. Burns/Treeline Analytics | WAC 314-55-102(1)(f) | Action lmits | Definition of pesticides to be tested is unclear. Outside of the pesticides listed in the table under section 314-55-108, "The action level for all other pesticides that are not listed in the table below or not allowed under subsection (1) of this section is 0.1 ppm." This is an "infinite list" and it is impossible. See proposed testing guidleines. | 4/4/2019 |
| Email | J. Burns/Treeline Analytics | WAC 314-55-102(1)(g) | Terpenes = NO | It would be imposible for the certified lab to know if terpenes were added or removed without being informed by the processor. Due [to] the high number of terpenes present in cannabis, a specific list of terpenes would need to be provided for testing. Different methods utlized by labs may have different abilities to measure terpenes. Based on this rule, any concentrate or distillate would require terpene testing since terpenes are removed. | 4/4/2019 |
| Email | J. Burns/Treeline Analytics | WAC 314-55-102(4)c | Remediation methods/ disclosure | The language indicates that only pesticides and residual solvents will be allowed for remediation. Microbiology remediation should be included. Methods of remediation should be defined, validated and audited. Specific quidelines should be specified for the disclosure of remediation to retailers or consumers. | 4/4/2019 |
| Email | J. Burns/Treeline Analytics | WAC 314-55-102(5) | Referencing purpose/traceability | The purpose(s) of reference samples should be listed as well as clearly stating how these samples should be handled in Traceability. Rules should be adopted to allow the transfer of samples between certified labs for additonal scientific verification data. THis type of practice is standard for scientific research and would allow for more accurate information and assist in protocol development and validation. | 4/4/2019 |
| Email | J. Burns/Treeline Analytics | WAC 314-55-102(6) | Products testing outside of traceability | We received guidance from the LCB that labs can receive cannabis samples from the general public for testing. These samples are considered outside of Traceability. However, labs can only do tests for which they are certified. We have concerns allowing samples that are outside of Traceability and the LCB to be comingled with samples in Traceability. Consumers should be required to take samples to non-certified labs. "Purposes described in this section" is unclear. If this language allows certified labs to accept samples from consumers outside of Traceability, clear guidelines, should be established regarding what testing is permited and how it should be recorded within Traceability. | 4/4/2019 |
| Email | J. Burns/Treeline Analytics | WAC 314-55-102(7) | Random sampling | This section is sufficent to protect the public from pesticides if random samplings of producer/processor locations are performed by the LCB, DoE and/or WSDA. | 4/4/2019 |
| Email | Matt Heist/Green Grower Labs | None provided, but comments speak generally to WAC 314-55-102 | Heavy metal screening | It would also be helpful to get some background regarding the impetus of heavy metals testing. Is there any data regarding failure rates in previous heavy metal testing as performed for past medical samples? Such data woul dbe informative as to whether such testing, and the costs associated therewith, are in the interest of public health. | 4/10/2019 |
| Email with attachment | Mark Ambler/TiPA | None provided, but comments speak generally to WAC 314-55-102 | Random sampling WSDA contract | WSDA should continue random and complaint based pesticide testing activities to identify issues and fix the underlying cause. WSDA shoud use fund #126 so that it ties those sampling and investigation costs to the pesticide or fertilization manufacturer. WSLCB funds should not be used to conduct random pesticide testing because this disconnects the fiscal liabilty of customer exposure from pesticide manufacturers. WSDA should audit and provide information to pesticide and fertilizer distributors. Last year we had to show local suppliers what the approved pesticide list was and how more than half of their products weren't on it. WSDA also has the auhtority to require manufacturers of pesticides which ar enot allowed on cannabis to label it as such in Washington. | 4/12/2019 |
| Email | Crystal Oliver/WSIA | None provided, but comments speak generally to WAC 314-55-102 | Heavy mteal screening = NO Pesticide screeing = NO | We DO NOT support lot level testing for pesticides or heavy metals. In Colorado some producers in Denver have discovered that Denver's drinking water contains some heavy metals at levels that exceed federal standards for safe drinking water. I am unsure how much testing for heavy metals in drinking water have been done throughout Washington State but I suspect we may encounter similar issues here which creates additonal concerns for the WSLCB when you are attempting to hold cannabis to a standard that drinking water dosen't even meet. | 4/10/2019 |
| Email | Crystal Oliver/WSIA | None provided, but comments speak generally to WAC 314-55-102 | Action limits | We are concerned about the current action limits associated with pyrethrin & piperonyl butoxide we have received many reports from farmers who state they are using pesticides that are on the approved as directed but are experiencing failures associated with these two items. There are also some studies, see attached, that indicate that some cannabis may naturally produce pyrethrin which makes an action limit for it even more problematic. Farmers should not be presented with a scenario where they are using an approved pesticide as directed and are subject to financial/ crop loss because the standards/action limits are set at an arbitrarily low number. | 4/10/2019 |
| Email | John Kingsbury | None provided, but comments speak generally to WAC 314-55-102 | Action limits | **Clearing measurable changes through DOH**.  What adhering to the law might look like from my point of view (assuming that LCB makes the claim that their rulemaking claim has made medical product obsolete) would be that any changes to contaminent action levels be cleared through DOH.  [As a historical note, DOH actually recommended lower action levels initially]. | 4/11/2019 |
| Email | John Kingsbury | None provided, but comments speak generally to WAC 314-55-102 | Concentrates | **Concentrates**.  Secondarily, I wanted to make you aware that I have been exploring legislation with a couple of legislators for a few months.  It has been a learning experience for me.  It is a technical subject.  As I am sure you are aware, besides being a traceability hole, concentrates have, in some cases become a waste dump for contaminated plant material.   This seems like a good time to address that issue.    Unfortunately, I do not have enough confidence in LCB's processes yet that I trust addressing concentrates can happen strictly through rulemaking and without legislative guardrails.    Still, this seems like a subject that should be addressed now. | 4/11/2019 |
| Email | Luke Hunter/Harmony Farms | WAC 314-55-102(1)(a)(iii) |  | It is fantastic that other contributing cannabinoids to the psychoactive experience in cannabis are being recognized, we believe that this is a positive for the industry moving forward. I believe that this section should be elaborated on to include more examples than just Delta-8, and the term “psychoactive cannabis derivative” to be defined clearly in this rule. | 4/10/2019 |
| Email | Luke Hunter/Harmony Farms | WAC 314-55-102(1)(b)(ii) | Foreign Matter Screening | Foreign matter screening: I believe that this section doesn’t flow very well and I am curious as to why any seeds would be aloud in product. I have worked with adjudicative cases where licensees have received AVN’s over having seeds in their product. The reasoning for the AVN was a non-industry member could take seeds from the product plant them and grow their own cannabis. It seems after making this determination to take enforcement action the rules should reflect a complete inability to have any seeds in useable cannabis. | 4/10/2019 |
| Email | Luke Hunter/Harmony Farms | WAC 314-55-102(1)(g)(ii) | Terpenes = NO | This section I believe should be stricken from this set of rulemaking as a majority of cannabis end products have “removed terpenes”. The term “terpene” is incredibly vast and lacks definition anywhere in rule, at the very minimum I believe there should be a definition of terpene somewhere in chapter 314-55. Useable flower in the curing process has terpenes that evaporate off of the drying flower, all extracts have terpenes stripped away from them in the process of extracting cannabinoids, and all marijuana infused edibles have added ingredients that contain terpenes. This section of rules would put the industry in a place where we would be required to get terpene testing performed on the majority of our products along with the other tests. Then the question is for what reward? In short my request is for the term “terpene” to be defined in WAC chapter 314-55 and to have (1)(g)(ii) to be stricken from this rule change. |  |
| Email | Luke Hunter/Harmony Farms | WAC 314-55-102(4)(b) | Retesting | This section now requires the licensee to request retesting, then “the board may authorize the requested retest to validate a failed test result on a case-by-case basis”. Inherently there are issues with this, first and foremost I foresee an appeal case for every time the board denies a request (there should be clear appeal language in this section of rule similar to other sections of 314-55). I additionally would recommend for an ability for the licensee to request a retest through the lab they are working with rather than reaching out for approval through the WSLCB. False positives are an inherent issue with testing the complex compounds found in cannabis, waiting on approval from the WSLCB for a retest would result in excessive pause between harvesting product and bringing it to market. Having the conversation facilitated between the licensee and the lab doesn’t pose any threat to public health or safety and alleviates a large workload from the WSLCB. If the rules do stay consistent with the draft language, I would like to see a clear policy/procedure to be put into place for how the WSLCB will handle this interaction with expected timelines and who to reach out to. | 4/10/2019 |
| Email | Luke Hunter/Harmony Farms | WAC 314-55-102(4)c(i) | Remediation | This section is almost perfect although I believe adding language to define that introducing a “toxic or harmful substance” that would still reside in the end product. We are still early in the scientific development when it comes to remediation on cannabis and it would be a hinderance if we could not use a toxic substance such as chloroform (that is incredibly volatile) to remediate a harmful pesticide from the end product the consumer ingests. I would think something along the lines of “Producer and processor may remediate failed lots, batches, or both so long as the remediation method does not impart any toxic or harmful substance to **the end product(s) of:** useable marijuana, marijuana concentrates, or marijuana-infused product”. | 4/10/2019 |
| Email | Ben DeChenne/Olympic Mountain Farm | None provided, but comments speak generally to WAC 314-55-102 | Pesticide screening = NO | Please don't add pesticide screening. The industry is already tanked and we are all struggling to even keep the power on. Crazy how many people I knew when this started who have had to file bankruptcy over marijuana. | 3/21/2019 |
| Email | James Dusek/James Downtown CC | None provided, but comments speak generally to WAC 314-55-102 | Pesticide screening = NO | We are a small Tier 2 producer processor and I would like to comment that the proposed changes is extremely harmful to producers. It’s especially damaging to small producers such as my company. The pesticide testing should be done by the Dept of Agriculture as is currently in the rules but order them to process tests for at least 500 products per month from various manufacturers not just products that are reported to them. Every manufacturer having at least 1 test per quarter. It’s our job to follow the rules not regulate ourselves! Pesticide testing every 10 lb lot is extremely redundant, costly and has a guilty till proven innocent policy to it. There are extremely too many tests currently. If anything the micro, pesticide and heavy metals testing should be random and not be required per lot. All this does is enrichen the labs. | 4/9/2019 |
| Email | James Dusek/James Downtown CC | None provided, but comments speak generally to WAC 314-55-102 | Pesticide screening = NO Heavy metals screening = NO | Pesticides: Extremely damaging to small craft producers. Testing every lot is crazy, costly and will put further strain on the producers that are barely hanging on. Dept of Ag should be testing 500 to 1000 products a month. Heavy Metals: Extremely damaging to small producers. Dept of Ag should test random samples per month. | 4/9/2019 |
| Email | James Dusek/James Downtown CC | None provided, but comments speak generally to WAC 314-55-102 | Potency | Allow the flower to be tested after the flower is dried at the lab for moisture testing. This is a true reading for potency | 4/9/2019 |
| Email | Lindsay Short/Natural Extractions Inc. | WAC 314-55-102(1)(g)(ii) | Terpenes = NO | This is not a public health issue. There are no psychoactive ingredients in terpenes. Terpenes are a natural occuring ingredient in more than just cannabis (lemons, oranges, lavender, etc. all have terpenes in them; none require any terpene testing). Additionally almost all extraction mehtods remove at least some, if not all terpenes in their process which means the LCB is basically making terpene testing a requirement for all extracts. I understand if a processor choses to makea terpene claim on their packaging why they would need test results to support this. If we are not calling out a terpene percentage, why is this a requirement? It woul dbe intersting to know how this rule got proposed and why it was felt to be necessary. Any insight to this is much appreciated. | 3/25/2019 |
| April 9 Live Comment | Shawn DeNae | WC 314-55-102 | Heavy metal screeing = YES Pesticide screening = YES Emergency rules = YES | Making products better available for patients. Need emergency rule for pesticides and heavy metal testing. Lift the THC limits for patients. Let the doctors and pts sort it. Lift limit on packaging. ¼ lb limit. Ingredients need to be listed. Terpenes, etc. | 4/9/2019 |
| April 9 Live Comment | Jed Haney/Lab Guild | WAC 314-55-102 | Emergency rules = NO Pesticide screening standardization | Don’t like emergency rule without discussion. DOH language is substandard. All pesticide testing should be equal across the board | 4/9/2019 |
| April 9 Live Comment | Jeff/Capital Analysis | WAC 314-55-102 | Dry weight rules Terpenes in traceabilty End product testing | Fix the discrepancy of dry weight rules. Micro and mico not strong enough. Other molds are a concern. Terpenes and cannabinoids need to be in traceability. Should be doing end point testing. What are the limits from a data conception? Need to be able to do R&D | 4/9/2019 |
| April 9 Live Comment | Amber/Medicine Creek Analytics | WAC 314-55-102 | Cannanoid concentration vs. potentcy | Potency is not correct term. Cannabinoid concentration or cofiles (sic) correct. CBD does have effect on brain. Science based testing with Limits of testing on the certificates. Science based board/SMEs should be working on these. | 4/9/2019 |
| April 9 Live Comment | Camilla Paine | WAC 314-55-102 | Phase in rules Inhaled vs. ingested | Like consideration to small producers and processors. Rec – roll out time 6 mo to a year. Labs choosing 502 testing that they do. Harvest level testing in flower. Concentrations should have more testing. Testing on inhaled rather than ingested. | 4/9/2019 |
| April 9 Live Comment | Kyle Capizzi | WAC 314-55-102 | Advisory committee Terpenes = NO | Advisory committee topics are listed in our written comments. Ranges rather than percent. Homogenizing batches. Experts should advise on this. Challenging performance at random. Committee should be advising on testing parameters. QA testing for other additives. Terpenes are lost in processing, not removed. Most of this in writing. | 4/9/2019 |
| April 9 Live Comment | Jim MacCrae/Straighline Analytics | WAC 314-55-102 | Terpenes = YES Functioning traceabilty Referencing mycotoxins = NO | Like call out of terpenes. Terpenes subset, allow them to report beyond that. Traceability system an issue. Referencing mycotoxins no longer necessary. QA changes in 2017 made more dangerous. Water and moisture activity. Mold etc., should come back in. Retail should be tested for more than potency | 4/9/2019 |
| April 9 Live Comment | Crystal Oliver/WSIA | WAC 314-55-102 | Pesticide screening/harvest level testing | Concerns on pesticides even though farmers are following directions because they fail anyway. Naturally occuring pesticides? 2 separate standards for edibles and other. Concerned about lack of competition. Harvest level testing. | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Cost | Consideration is being given to small businesses related to heavy metals testing | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Limits on THC | Limits on THC & amounts for patients | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Emergency rules = YES | No emergency rule | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Dry weight rules | Discrpancy between dry weight corrections (as received or prior?) | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | R&D testing | Need to be able to do R&D testing | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Potency vs. cannabinoid concentration | Potentcy vs. cannabinoid concentration/profile | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Defintions needed | Psychoactive/derivative/scientific language - define | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Correct typo | Typo in heavy metals unit (micrograins per gram) | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Terpenes = NO | Labeling - striking "terpenes" and include other additions | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Refeferencing mycotoxins = NO | Micotoxins don't need to be referenced | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Yeast and mold testing | Yeast and mold testing should be brough back | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Lab market share | Lack of competition among labs | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Emergency rules = YES | Emergency rule for heavy metals needed! | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Increase THC limit for patients | Lift THC limits for patients | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Increase THC limit for patients | Increase amount of product patients can purchase | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Labeling accuracy | List ingredients on product labels | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Testing standardizaion | All pesticide tesitng should be ubiquitous between DOH and LCB rules | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | More tests | Increase mycotoxin/other current tests | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Terpenes in traceability | Increase cannabinoid/terpenese into traceability | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | End product testing | End point testing | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Definitions | Limits of acceptable consumption (define) | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Testing standardizaion | Include limits of detection & LOQ | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Data | Science based/data driven decisions | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Phase in rules | Roll-out timeline - 6 months/1 year | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Testing standardizaion | Chose i502 scope of testing | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Harvest lot | Harvet testing for flower; concentrates - pesticides, heavy metals | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Ingested vs. inhaled | Ingested vs. inhaled pathways | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Testing standardizaion | Be able to do additonal testing | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Functioning traceability | System is there; just needs to be enforced more stringently | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Homogenization concentrate baths | Homogenization concentrate baths- reduces economic impact | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Advisory committee | Advisory board | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Terpenes = YES | Specific terpenes, create a subset, but carefully report | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Testing standardizaion | Moisture content/water activity - revisit | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Testing standardizaion | Bring yeast/mold testing back in | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Action limits | Action limits on approved pesticides - failing - pyrythrin | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Testing standardizaion | 2 standards for concentrates - edibles/inhalents | 4/9/2019 |
| April 9 Live Comment | Flipchart Note | WAC 314-55-102 | Harvest lot | Harvest level testing | 4/9/2019 |
| Email | Toni Nersesian/Palouse Farms | None provided, but comments speak generally to WAC 314-55-102 | Pesticide screening = YES Random testing Lot size increase = YES Heavy metals testing = NO | Good day. We are a Tier One P/P. 1. Pesticide testing I do NOT want any consumer to purchase cannabis that has illegal pesticides in their product.  I request you continue to INCREASE your funding for random testing, off the store shelves. Bad players know how to avoid bad test results. Random testing and serious fines will do more to quickly clean up our industry than mandatory testing for everyone  2. Lot sizes – 15 lbs.  Even as a Tier One, larger lots would have helped us. If a Tier One can combine harvests of the same lot, they could achieve larger weights.  3. Heavy Metals testing This seems to be a test promoted by the lab(s). Does not seem to be a serious problem. You could require annual water tests for metals. | 4/15/2019 |

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| **Source** General Comment | **Commenter** | **WAC Reference** | **Theme** | **Comment** | **Date Received** |
| Email | Danielle Rossellison/Trailblazin' Productions | N/A | DOH General Use Logo | I've heard the LCB talk a couple times about possibly getting rid of DOH "General Use" (I realize that this is a DOH issue as well).  As a producer/processor who has been actively marketing our product as DOH "General Use" Compliant for a year now, I am hoping we can keep the logo and just adjust the requirements.  I would hate to see those of us who have invested time and energy to market DOH Compliant product, be punished by getting rid of the "General Use" logo.  I am all for raising the pesticide and heavy metal standards of all recreational product, but I think it's important we still have the ability to differentiate product that is exceptionally "clean" or "medical grade". Perhaps lower levels for bile? Perhaps required terpene tests? Lower levels for residual solvents (500ppm instead of 5000ppm)? I am open to other ideas as well.  My biggest concern is that we don't inadvertently hinder those companies who have worked tirelessly to promote DOH "General Use" products and who have meeting DOH standards, putting public safety at the forefront of their business' mission. | 3/20/2019 |
| Telephone Conference | Dani/GOAT Labs | N/A | Standardized testing Negative lab Impact | Standardized testing is preferred. Most labs are barely making it. Doubling lot size, millions in equipment. Some labs are undercutting budget. Currently, charge $90 for i502 testing (mycobio/potentcy/everything) and makes $6 profit. Others charge $70. Trace charges $180 for the same tests. Time of service payments would help. Proposed rules would cut revenue in half. | 3/25/2019 |
| Email | Bob Ramstad, Paradoxical, dba Oz | N/A | Published test results | Hi there, I own and operate OZ, a medium sized cannabis retailer in the Fremont neighborhood of Seattle. I understand there are some forums and discussions going on regarding upcoming rulemaking on Quality Assurance Testing for cannabis.  I don't have an email for Kathy Hoffman so thought I'd send my feedback here. It is essential that the state take control of the actual lab results for product lots.  It is impossible for me as a retailer to know for sure if a CoA provided to me by a processor is in fact legitimate.  There is no way for me to know if it has been altered or reused.  It is also not possible for me to even know if a given child lot sold to me actually matches a given parent lot that the processor claims it is from. The simple fix is that the LAB should provide the required TEST RESULTS directly to the STATE along with the parent lot.  The STATE should then allow ALL parties, including the public, access to all the results in the system. Beyond that, the state should allow for easy lookup of a child lot to find the parent lot and all the test results associated with the parent lot.  This gateway should be available to the public. IMHO this is the only sensible approach given that we're moving in a direction of pesticide testing and heavy metal testing as well as potency...  people deserve to know what is in the product they are consuming, and we need a neutral third party, public facing, to warehouse and provide those results to everyone. (The other alternative is to make the labs host the test results, but again, that seems like a bad idea, as the labs could modify records over time and that would be hard to catch...  if the lab provides the result to the state in a one shot, and the state then houses the results and lets people look at them, anyone who wants, it's impossible for the lab to alter the results after the fact.) I think this would go a long way towards greater confidence in the state 502 system, especially for medical patients. Thank you for taking this suggestion into consideration. | 4/4/2019 |
| Email/Feedback Doc | J.Burns, Treeline Analytics | N/A | Pesticide screening = NO Heavy metals sreening = NO | The requirement of pesticide (heavy metal) screening on all intermediate and final product is unnecesary. It is also premature on the state of knowledge of testing the cannabis matirx for these compounds. This is demonstrated by the results from Fall 2018 ILC/PT (Emerald Scientific) for 58 of the pesticides listed in WAC 314-55-108. 31 participating labs had difficulty accurately determining pesticide levels in a spiked hemp matrix. Composite analysis of all reported values shows a standard deviation range of 41% to 285% and the percent recover range of 13% to 11,707% for individual pesticides. 29% of reported mean measures were <80% or >120% of the assigned value. Data available on the Uncle Ike's website show that only ~8% of randomly smapled product available to the consumder contained pesticides above the action limits. | 4/5/2019 |
| Email/Feedback Doc | J. Burns, Treeline Analytics | N/A | Random sampling of packaged product | Packaged product collected from producers/processors before shipping to retain [retail] outlets to maintain chain of custody. Reail sampling could be added but chain of custody may be more difficult to maintain. These samples will test for banned pesticides and determine that approved pesticides are below action limits. Random sampling would alllow for a data base to be generated that oculd be analyzed by a workgroup or a third party to determine the ability of labs to detect pesticides in the cannabis matrix. This would allow for the accurate determination of appropriate action levels. It would also provide information on frequency of false negatives and positives. | 4/5/2019 |
| Email/Feedback Doc | J. Burns, Treeline Analytics | N/A | Random sampling of producers | Soil, plants, hydrophonic system, spraying equipment. These tests would help detect banned pesticides. Processors/producers would pay a predetermined licensing fee equivalent to the cost of testing; or producers/processors would pay testing lab directly. Samples could be processed by state or certified lab. | 4/5/2019 |
| Email/Feedback Doc | J. Burns, Treeline Analytics | N/A | Alternative pesticide and heavy metal testing program | Sampling of all products is unnecesary to achieve the goal of protecting the public from pesticides. This can be achieved by farm level sampling in association with ranodm sampling of packaged product. As of Feb 2019, data from the Uncle Ike's OK testing program shows ~8% of tested samples fail for pesticides, suggesting that pesticide contamination is not a significant problem to warrant testing at the product level. Consumer proteciton could be achieved by following methods similat to the ones the USDA/FDA conducts on food. | 4/5/2019 |
| Email/Feedback Doc | Amy Trudeau/WoW Industries | N/A | Standardized testing Negative producer impact Increased costs | I have been in the industry since September of 2014. In my opinion, the single major problem with the cannabis quality assurance testing is that DIFFERENT LABS RENDER DIFFERENT RESULTS! You need to do away with ALL of the fuss and regulations in “trying” to police and ensure that all testing labs are doing the same testing but with different equipment and different procedures. It clearly has been a fail. It hasn’t worked, and, what it has done is create an industry on number-driven results. Let us not forget all the revenues our industry has brought in to the state of Washington through taxes, licensing and permitting with which we get hit at every level: state, county, and city which squeezes any profit from already struggling farms. Simply, the industry needs to change! First start by awarding a state contract to ONE testing laboratory for ALL quality assurance testing. Then how could any of us dispute this? I believe you would see a stabilization of pricing and perhaps an increase. There would be a lot less fishing for potency and jumping ship from lab to lab to get this week’s highest testing results! If the industry is going to require all this testing, it needs to reflect that in the sale price of the concentrates. More testing costs more money! Again, the sale price of our concentrate has been reduced to a price that can’t be sustained. Please hear us and make the changes necessary for us to thrive. We need more education and encouragement and less punishment from the WSLCB. We are legitimate business people supporting numerous families in this young, complex and competitive industry. Give us a hand up! | 4/5/2019 |
| Email/Feedback Doc | Amy Trudeau/WoW Industries | N/A | Competitive Pricing | The higher the potency the more money you can ask for the product. In the early stages of the industry, you could sell a 1-gram concentrate for $16 - $18. Now, sadly we have to bicker with retailers and be price-bashed just in order to make the sale. That 1-gram concentrate now goes out the door for $4 - $8.33. The cost of labor to produce the concentrate hasn’t gone down nor has the cost of electricity, nutrients, insurance and packaging just to name a few expenses. | 4/5/2019 |
| Email | Jed Haney | N/A |  | I wanted to drop this note to you to inform you that there seems to be a lot of interest in the upcoming meeting this week. I hope that you are prepared to have a room full of stakeholders as well as the laboratories. From what we are hearing there will be a lot of unhappy farmers showing up. | 4/8/2019 |
| Email/Feedback Doc | Cannabis Alliance | N/A | Functioning traceability | A functioning traceabilty system is critical to the success of a viable testing program. Until adequate and transprarent traceabilty can be created and/or addressed (LEAF system actually functioning or replaced), many of the aspects of quality assurance testing such as representative sampling, chain of custody and legal defensibilty of results are compromised and/or unenforceable. | 4/9/2019 |
| Email/Feedback Doc | Cannabis Alliance | N/A | Advisory Committee | The recommended course of action for proposed rules is to address the multitude of complicated issues through review by a formal advisory committee. (a) The Advisory Committee is not just another workgroup but comprised of a broad range of educated professionals specifically created to advise the agency on policy. (b) Outcomes and/or recommendations of the Advisory Committee are to be adopted by WSLCB or DOE, and if not, heavily considered or required written board response before being discarded. (c) Areas of concern already identified, that should be addressed by the Advisory Committee, are called out in multiple sections below [referring to document]. | 4/9/2019 |
| Email/Feedback Doc | Cannabis Alliance | N/A | Advisory Committee | Advisory Committee topics. The need for an Advisory Committee to review specific topic areas and make recommendations. A. sampling. All aspects; B. Limits of Detection (LOD's) and Limits of Qualification (LOQ's); C. Proficiency testing; D. Cannabinoid Testing, reporting recommendations (significant figures vs. range), and examination of requirements for all required tests or additions to currently required battery; E. "Batch" definition. Homogenization of batch needs to be examined. I.e. Different extraction runs may have different pesticide loads and incomplete blending will lead to non-representative samples and non-homogenous 'batches." F. Additive Testing/Requirements, including Terpenes; G. Timeline/Phase in; H. Recalls. Recall protocol and expectations should be defined, clearly articulated and enforced. I. WSDA Contract and the agency's future rule in QA testing. Random testing. J. Address Cost efficiencies. Make the cost of testing meaningful. | 4/9/2019 |
| Email/Feedback Doc | Cannabis Alliance | N/A | Rules phase in WSDA Contract | a. What phase-in timing works for balancing board vs. business needs? The advisoty committee will be critical in helping the board understand this. b. Does the new language effectivley remove any difference between "medically compliant" and regular adult-legal products? What are the implications for laws currently addressing this and bills being considered? c. What is occuring with the WSDA contract to sample products and test for pesticides? How does that relationship between the agencies factor into the decisions being made for overall QA Testing? | 4/9/2019 |
| Email/Feedback Doc | Cannabis Alliance | N/A | Small Business Impact Statement (SBIS) or Economic Impact Statement (EIS) | Small Business Impact Statement (SBIS) or Economic Impact Statement (EIS) must be done for processors/producers (P/P) and labs. A. Changing the structure of sampling and tests changes the financial burden on on P/P and ultimately will factor into business closures or increased consumer prices. B. Recommend timeline for phasing in new testing requirements be stepped and gradual to reduce large bottlenecks in testing and prevent P/P's from holding large amounts of high-value inventory waiting for test results. | 4/9/2019 |
| Email | Matt Heist/Green Grower Labs | N/A | Rule Proposal Approach | We do wholeheartedly thank you for your measured approach in new rule proposals. Past rule implementation was a bit alarming in regard to short timelines in which to fulfill the requirements under said rules. | 4/9/2019 |
| Email | James Dusek/James Downtown CC | N/A | Negative producer impact | There are so many problems with the current rules for producers that are the reason Washington is the absolute worst state to produce Cannabis. All of the power is in the hands of the retailers. A new trend is retailers are wanting to return old product because they say it didn’t sell. This is ridiculous they need to manage their inventory but if we don’t accept the return and provide a credit or replacement as demanded we risk getting blacklisted and the retailers won’t buy from us anymore. Tier 3 grows should be charged by the square foot for their licenses or eliminated all together. The fact that my small tier 2 pays the same as a 30,000 foor grow is insane. Small producers need a craft outlet to sell their products direct to the public. The system is broken, large grows have retail licenses thorugh family and hidden buisness deals. Retailers have hidden investments in producers and the small guys tha tfollow the rules are getting pushed out. Less testing for producers that have a track record of passing tests. Allowing producers to have 3 licenses was a terrible decision and should be reversed. This is a major factor contributing to the overproduction problem that the WSLCB and the legislature refuse to do anything about. Allowing stores to have more and more retail licesnes is extremely damaging to the market. It's been five years and its time we make some changes before all of the original licensees are pushed out. | 4/9/2019 |
| Email | Matt Heist/Green Grower Labs | N/A | DOE Accreditation | Our greatest concern involves any regulatory actions taken before the impending standardization of testing by the Department of Ecology.  Any requirements before that time that would involve the purchase of equipment  approaching a million dollars, could put labs in a potenctially devastating financial situation.  For example, in our research, manufacturers of the lab equipment assure us that all pesticides can be tested using their top of the line liquid mass spec.  On the other hand, the WA dept of AG, who currently tests cannabis pesticides, has recited in an email that a liquid AND a gas mass spec are required.  This means labs could spend up to 600 thousand dollars on a liquid mass spec only to find out a year or two later after standardization is created by the department of ecology, that another 200 hundred thousand dollar investment in a gas mass spec may suddenly be required.  The financial burden may cause labs to exit cannabis testing and decrease competition, especially considering the current banking environment and challenges of financing such a significant sum of money.  If the proposal to only test pesticides and heavy metals is on a "per harvest" basis, then a concise definition would have to be developed.  If the requirements for pesticide testing are minimal as in only "once par harvest", then most labs couldn't invest in the testing equipment.  This could create a severe back log of product going to market | 4/10/2019 |
| Email | James Shults | N/A | Rule Proposal Approach | This is James Shults, we met yesterday at the marijuana listen/learn/comment work session. I wanted to thank you for the presentation and for creating such an inviting and interactive work session. I've worked in Washington's recreational cannabis industry for a number of years, first in a certified analytical lab and more recently for producer/processors, and I can honestly say this is the most optimistic I have been about LCB involvement and willingness to elicit meaningful input from stakeholders. This optimism is a direct result of your presentation and my impression that you're willing to put in the extra work at the beginning so we can create real solutions for the industry by the time rules are made real. Thank you again for your presentation and I look forward ot more in the future. | 4/10/2019 |
| Email | Crystal Oliver/WSIA | N/A | WSDA contract Functioning traceability Labeling accuracy | WSIA would prefer to see the WSDA empowered with more authority to educate, requlate, and enforce pesticide compliance by cannabis farmers. We are supportive of random farm inspections & sampling by the WSDA to address pesticide issues at the source. Through voluntary pesticide testing we have identified that there are issues with false positves as well as cross contaminiation at the processing level. As well as issues with traceability and accuracy of labeling by processors which have been uncovered by Unkle Ile's OK program. | 4/10/2019 |
| Email | Crystal Oliver/WSIA | N/A | Negative producer impact | The farmers cannot support ANY additonal increases in operating expenses. We have been getting squeezed for 5 year straignt. If local, state, & federal taxation was different, if we didn't have to pay extra for everything else we need such as banking & insurance we might feel differently but given the reality of most farms financials we cannot bare another increase in testing costs. Last time there was a change in testing standards the farmers saw a 50% increase in testing costs which wasn't correctly anticipated in the SBEIS that was done at that time. I'm not sure that labs can be relied upon to provide an accurate estimate of the increase in testing costs to the farmers, I also know that there is pending legislation relted to DOE certification of labs which includes assessment of a fee on labs to fund it. I am confident that this fee increase will be passed down to farmers and want to make sure we take that reality into consideration as well. | 4/10/2019 |
| Email | Crystal Oliver/WSIA | N/A | Advisory Committee | Several labs testified that a workgroup should be established to further vet this section of regulations. In the event that such a workgroup is formed is must absolutely include farmers. | 4/10/2019 |
| Email | Crystal Oliver/WSIA | N/A | Harvest Date | The Lab Guild Commented that they wanted harvest date added back on to packaging.  We are vehemently opposed to this.  WSIA worked with Joanna for years to have it removed as it had a disproportionately negative impact on sungrown farmers ability to sell their product and its inclusion was not supported by any public health concerns.  We are required to include the lot # on packaging which provides ample information for identifying product in the event of a recall. | 4/10/2019 |
| Email | Crystal Oliver/WSIA | N/A | Competitive Pricing | We remain concerned about the lack of competition in testing labs offering heavy metal & pesticide testing. Lack of competition in the insurance space has led to significant increases each year and we fear the same thing will happen when it comes to increased testing requirements. | 4/10/2019 |
| Email | Jed Haney | N/A | DOE accreditation Costs | I wanted to follow up on the remarks I was making during the beginning of the meeting concerning the current rulemaking timeline.  I am alarmed to hear that you are proposing to push the CR 102 to this fall with the assumption that these rules will be implemented by Jan 2020.  Please allow me to explain. Two things - First, this shifting timeline is not healthy for any standard of business. We started preparing for mandatory pesticides when you initially announced the product intent. Second, this extended timeline is not good for the laboratories because we will have to take up rulemaking again post the recommendations from the Cannabis Science Task Force that will be delivered to the legislature by 07/01/2020, which will include agency recommendations for pesticide analysis. Having an extended rulemaking is not appropriate because we can assume that the next phase of rulemaking will be predicated on a platform of interagency recommendations developed through a robust scientific process with the Department of Ecology. As I am sure you have seen this amendment I will not belabor on the details. I would like to emphasize that we need time to make the investments that you are prescribing to the industry. For example, each time the pesticide action limits are adjusted we must overhaul our internal methodology. This process can take up to 6-months to properly validate so if you are to create back to back rulemaking on these action limits then it means we can predict internal wasted energy. Further, the pesticide accreditation being administered by RJ Lee will likely have to be updated to reflect the recommendations from the Cannabis Science Task Force. Finally, I would like to bring up that if you extend this rulemaking to Jan. 2020 that will mean we will have been working on these rules for over 15 months by that time. Although we appreciate the extension of the rulemaking process to allow for more input to be considered it is not appropriate to have such a long rulemaking session only to anticipate opening up a rulemaking period on pesticides again within another 6 to 9 months. Please consider the above points prior to the Quarterly Meeting this next week. This rulemaking timeline is a priority concern of ours. | 4/11/2019 |
| Email | Jed Haney | N/A | Rule Proposal Approach Cost Quality of forum comment Exclude all but lab owners and scientists from rule development | Kathy, this email shall serve as our initial response as we prepare our formal remarks to the Listen and Learn Forum. I would like to note that I appreciated this style of information gathering. It serves to create a dialogue that is not generally experienced in moments of public testimony. The team including Debie did a great job managing the meeting. My only critic is that you had non-scientists packing a room making policy recommendations that are not vetted through any significant process. Some of these suggestions were so out in left field, so to speak, that myself and others were frustrated that we didn't have the time to respond to them. The majority of their remarks are based on the market economic situation that we find our selves in, which is called the "race to the bottom." Currently, the wholesale market has tanked to sub .20 cents per gram (I have reports down to .02 cents per gram) so you can expect economic concerns from the producers and processors, concerns that are resolved by enforcement of current rules such as the restrictions of sales below the true value of production. What you did was create a room full of stakeholders that are competing for a fraction of the margin of profit that is left in the wholesale sector, therefore, you diminished the voices of the labs. In other words, the labs take a risk when calling out for greater standards that will cost our customers money, even if these suggestions are based on ASTM approved standards. You will note that not all of the labs showed up and out of the ones that did not very many of them spoke up. Please consider hosting closed stakeholder meeting/forum to collect the opinions and suggestions of the owners and scientists that represent these labs without them potentially feeling intimidated by speaking up in front of their customers. | 4/11/2019 |
| Email | John Kingsbury | N/A | DOH Compliant Product | I think we can all agree that the implementation of medical cannabis by LCB has been disappointing at best so far.  This process could be an opportunity to recover that rather damaging fumble. With regard to that, I want to make the comment that, even if LCB intends to make the claim that testing makes a "medical" category absolete, LCB is still bound by the law to check with DOH about whether the categories of products that LCB is declares 'benefitting the needs' in fact does that in the view of DOH. [per RCW 69.50.375 (4)] I think you should document that process in a transparent way. | 4/11/2019 |
| Email | Mark Ambler/TiPA | N/A | Negative producer impact | WAC 314-55-075(6) requires that a Tier 1 Producer grows less that 2,000 ft of cannabis which is 5X less than Tier 2 Producers (10,000 ft) and 15X less that Tier 3 Producers (30,000 ft.) In 2018, 46.7% of Tier 1 Producers (63 out of 135 surveyed) left their farms lay fallow, many stating economic reasons. We are almost at the LD50. This means many of us had no revenue in 2018. This regulation would not be a minor cost to us. We are not like notmal small businesses. Our access to capital is sebverly limited. We can't claim bankruptcy when we fail. We spend signficant time self auditing, getting inspected, and tracking exact pesticide and fertilizer use at our secure facilties. Each of our Tier 1 Farmers care product liabilty insurance in case there ever is an issue. Implementing a drag net cannabis sampling program would result in massive collateral damage to our industry. For our Tier 1 Producers to compete on a global scale with billion dollar publicly traded companies, we can't be forced to spend an extra $0.116/gram on test that aren't aligned with our foreign customer's local laws. Thank you for considering Washington's Small Cannabis Farmers. We are dying and need your help. | 4/12/2019 |
| Email | silence30924 | N/A | Negative producer impact | I own a 502 producer/processor and I just heard that there is discussion about adding mandatory heavy metal and pesticide testing for every 5-pound lot of product.  Well, if you want to finish the job of driving the small growers out of business, by all means proceed with the least cost-effective way of dealing with this "problem." The same effects can be obtained from a random testing program or from allowing harvest-sized batches, but hell, all those small growers are raking in the money, so they are ripe for a little more squeezing, right?  And by the way, do you know how many people have been killed by "contaminated" weed worldwide in the history of man? Zero. Do you know how many have been sickened? Zero confirmed. Good thing you are addressing this problem! I feel safer already! | 4/15/2019 |
| Email | Fred Brader/Orgrow LLC | None provided, but comments speak generally to WAC 314-55-095 Marijuana servings and transaction limits | Serving size limits | Serving Size limits:  Please consider changing the serving size limits of Marijuana Infused Products to 7 gr.  from one gram to distinguish it from a Marijuana Concentrate which can have a THC content percentage of 60-95%.  Concentrates are much higher in THC than Marijuana Infused products which are typically in the range of 30-45% Total Cannabinoids.  There should be consideration for marijuana infused products to have serving size limits closer to marijuana for inhalation which can carry total cannabinoids close to 30% by themselves.  Listed below are some excerpts from the rules.  (y) "Marijuana concentrates" means products consisting wholly or in part of the resin extracted from any part of the plant Cannabis and having a THC concentration greater than ten percent. The definition of a Marijuana-infused product per RCW 69.50.101: (ee) "Marijuana-infused products" means products that contain marijuana or marijuana extracts, are intended for human use, are derived from marijuana as defined in subsection (x) of this section, and have a THC concentration no greater than ten percent. The term "marijuana-infused products" does not include either useable marijuana or marijuana concentrates. | 4/15/2019 |
| Email | Kelly Martineau/Chieck Barn Farms (Tier 1) | N/A | Negative producer impact Heavy metals screening = NO Pesticide screening = NO | I am writing to ask that we put this on the back burner for now. Now that Hemp is legal in the United states we will start to see pesticides for hemp crops….hemp and cannabis are the same plant. Many of the allowed pesticides are allowed under a work around as the EPA would not register something for cannabis (hemp) because it WAS legal. I would like to see how this changes now that hemp will most likely be a crop listed on EPA registered pesticides. We need to wait. In addition to the above, as a very small tier one, I absolutely cannot afford these proposed rules. Lower the licensing fee for tier ones, as we do not use as many of hte LCB's resources, these rules are ruining the family farms, a concern and the just of the passed i502 in the first place. | 4/16/2019 |
| Email | Craft Cannabis Washington Farmer/TiPA/Mark Ambler | N/A | Negative producer impact | Your messaging is fine. We're more concerned that the Labs and Industry groups were notified with ample time to prepare and we were notified the day of the meeting. We are also concerned about the risk of this scenario: 1. Producer A grows cannabis and supplies that recreational product to the market. 2. WSDA and LCB tells the public we're cleaning up recreational marijuana for medical patients. 3. Consumer A has a father with stage 4 cancer and heard that cannabis cures cancer and now his store is selling fully tested product. 4. Consumer A gives his father recreational cannabis and he dies In this scenario the recreational cannabis Producer would likely be sued by the Consumer's family although they never intended for sick people to use their product. Presenting these rule changes as exposure risk reduction is dangerous to the public. We propose to set a much, much, much higher bar for medical cannabis and leave recreational cannabis to consumers healthy enough to handle the intense mental and physical effects of the product. For medical, if we want our products in hospitals where they can be prescribed by Doctors, not budtenders, we need to follow the same process the pharmaceutical industry uses. These rule changes may be what labs and large producers with 10's of thousands of pounds of stockpiled medical cannabis want, but us small farmers who are struggling to keep the lights on can't afford it. Please help us. | 4/18/2019 |
| Email | Craft Cannabis Washington Farmer/TiPA/Mark Ambler | N/A | Negative producer impact | We are concerned that the board may have been lead to believe producers overwhelmingly support this rule proposal. We conducted a phone survey of Tier 1 Producers and **90%** of them answered **no** to the following question: "Do you think that producers should be required to test all marijuana flower for pesticides and heavy metals?" Meanwhile, we noticed several surveys published by pay-to-join industry groups which didn't even ask that simple question. These are industry groups with laboratory representatives on their boards, led by large producers who are stockpiling 10's of thousands of pounds of medical marijuana. They may lead you to believe our greatest concern is 5 lb. vs. 10 lb. lots. Please give us an opportunity to speak on this issue in person. We're counting on all of you to give us a voice and let us be heard. Let's travel through this time of change together. Don't let the Tier 1 Producer die in silence. Help us. | 4/19/2019 |