

PETITION FOR ADOPTION, AMENDMENT, OR REPEAL OF A STATE ADMINISTRATIVE RULE  
ADD HARVEST/PROCESSING DATE TO MANDATORY LABELING WAC 314-55-105

Additional Sheet- Olivier

Washington Cannabis consumers do not have enough information to determine the quality of the product they are buying. On most labels all we get is potency and grower/processor business names. Some processors do a much better job and include things like harvest date and terpene profile.

Knowing the age of the Cannabis product one is about to buy is a non-controversial and easy to provide data point.

Consumers are concerned about mold growth, mycotoxin formation and terpene degradation in flower that is tested and then stored in bulk for a year or more. Older products are at increased risk of mold and mycotoxin formation and particularly vulnerable consumers should have information by which to judge this.

For people seeking Cannabis as medicine knowing how long the product has been in storage is critical as knowing cannabinoid dosage and profile is essential to medical dosing and that profile can change over time.

Harvest date was required on the label from the beginning of our grand experiment until WSR 16-11-10 eliminated it on 5/8/16. Its time to give some power back to the consumer. There is no good reason to hide the age of the product. We should be focused on providing more information to the public, not less.

The driving force here is Sungrowers. Consumers are concerned with freshness. Most Sungrowers harvest only once a year. They need to hold inventory so they have product to sell until the next harvest. Basic business. Concealing the harvest date is not the right way to go about this. Sungrowers should educate the public on why their product is as good on day 300 as it was on day one.

The only other source of information for Cannabis consumers is lab COA's. Looking at the date on the COA is the only way consumers can determine the age of what they are buying if that date is not on the product label. Retailers are required to provide COAs on demand to the consumer but most can't or won't.

There is no good reason to conceal harvest date for Flower and processing date for Concentrates.