

# CANNABIS CONTROL COMMISSION <u>Public Meeting</u>

April 25, 2019

10:00AM

Massachusetts State House 24 Beacon Street Hearing Room A-2 Boston MA, 02133



#### **Agenda**

- 1) Call to Order
- 2) Chairman's Comments and Updates
- 3) Minutes from April 4, 2019
- 4) Executive Director's Report
  - a) Job Descriptions
  - b) License and Registration Application Data
  - c) Updates
    - i. Social Equity Program RFR
    - ii. Temporary Patient Registration
- 5) Staff Recommendations on Final Licenses
  - a) CommCan, Inc. (# MC281642), Cultivation Tier 5 / Indoor
  - b) CommCan, Inc. (# MP281508), Product Manufacturing
  - c) Garden Remedies, Inc. (# MR281942), Retail
  - d) Rise Holdings, Inc. (# MR281254), Retail



#### Agenda Continued

- 6) Staff Recommendations on Provisional Licenses
  - a) Emerald Grove, Inc., Vertically Integrated Medical Marijuana Treatment Center/RMD
  - b) Green Meadows Farm, LLC., Vertically Integrated Medical Marijuana Treatment Center/RMD
  - c) Health Circle, Inc. (# MCN281787), Cultivation Tier 3 / Indoor
  - d) Health Circle, Inc. (# MPN281533), Product Manufacturing
  - e) Health Circle, Inc. (# MRN281426), Retail
  - f) Mass Yield Cultivation, LLC. (# MCN281392), Cultivation Tier 2 / Indoor
  - g) Nature's Remedy of Massachusetts, Inc. (# MRN281553), Retail
  - h) Nature's Remedy of Massachusetts, Inc. (# MRN282049), Retail
- 7) Staff Recommendations on Change of Ownership Applications
  - a) Alternative Therapies Group, Inc.
  - b) Caregiver-Patient Connection
  - c) East Coast Organics, LLC



#### **Agenda Continued**

- 8) Commission Discussion and Votes
  - a) Guidance Document: Renewals
  - b) Software Contract Amendment
  - c) Regulatory Policy Discussion
- 9) New Business that the Chairman did not anticipate at time of posting
- 10) Next Meeting Date



## **Licensing Applications | April 25, 2019**

- 3,230 Total Applications
- 379 Pending (At least 1 Part of Application)
- 235 Withdrawn
- 2,477 Incomplete

The totals are distinct license numbers that have submitted at least one of the packets related to getting a license (App of Intent, Background, Management/Ops, Payment)

Туре		
Craft Marijuana Cooperative	6	
Independent Testing Laboratory	5	
Marijuana Cultivator	99	
Marijuana Microbusiness	19	
Marijuana Product Manufacturer	59	
Marijuana Research Facility	6	
Marijuana Retailer	166	
Marijuana Transporter with Other Existing ME License	4	
Third Party Transporter	15	
Total	379	



#### **Licensing Applications | April 25, 2019**

#### **368 Applications Under Review**

The totals below are distinct license numbers that have submitted all required packets.

Туре	#	+/-
Craft Marijuana Cooperative	2	
Independent Testing Laboratory	6	
Marijuana Cultivator	112	+5
Marijuana Microbusiness	9	
Marijuana Product Manufacturer	87	+5
Marijuana Research Facility	5	
Marijuana Retailer	141	+11
Marijuana Third-Party Transporter	3	
Marijuana Transporter with Other Existing ME License	3	
Total	368	+21

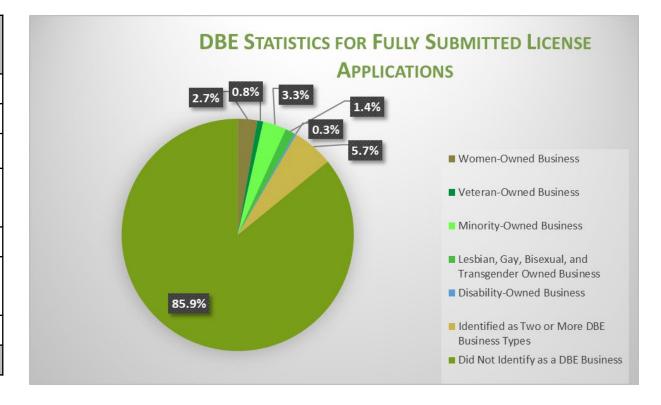
RMD Priority: 171
Economic Empowerment Priority: 6
General Applicant: 191

The 368 applications represent 188 separate entities

# Licensing Applications | April 25, 2019 Disadvantaged Business Enterprise (DBE) Statistics

The totals below are distinct license numbers that have submitted all required packets.

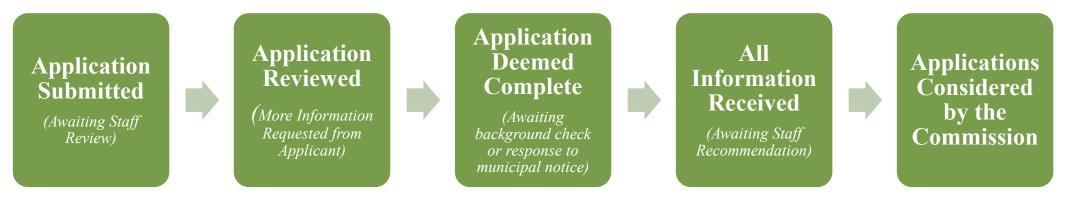
Туре	#	% of Group
Women-Owned Business	10	2.7
Veteran-Owned Business	3	0.8
Minority-Owned Business	12	3.3
Lesbian Gay, Bisexual, and Transgender Owned Business	5	1.4
Disability-Owned Business	1	0.3
Identified as Two or More DBE Business Types	21	5.7
Did Not Identify as a DBE Business	316	85.9
Total	368	100.0





#### **Licensing Applications | April 25, 2019**

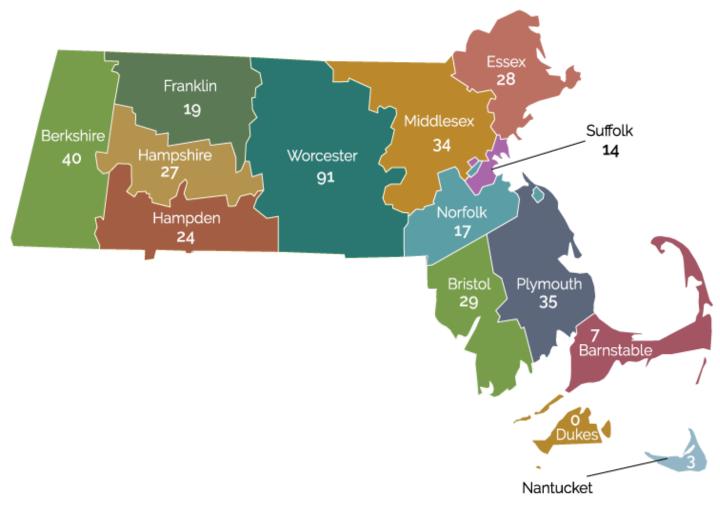
Status	#
Application Submitted: Awaiting Review	111
Application Reviewed: More Information Requested	70
Application Deemed Complete: Awaiting 3 <sup>rd</sup> Party Responses	42
All Information Received: Awaiting Staff Recommendation	6
Applications Considered by Commission	139
Total	368





## **Licensing Applications | April 25, 2019**

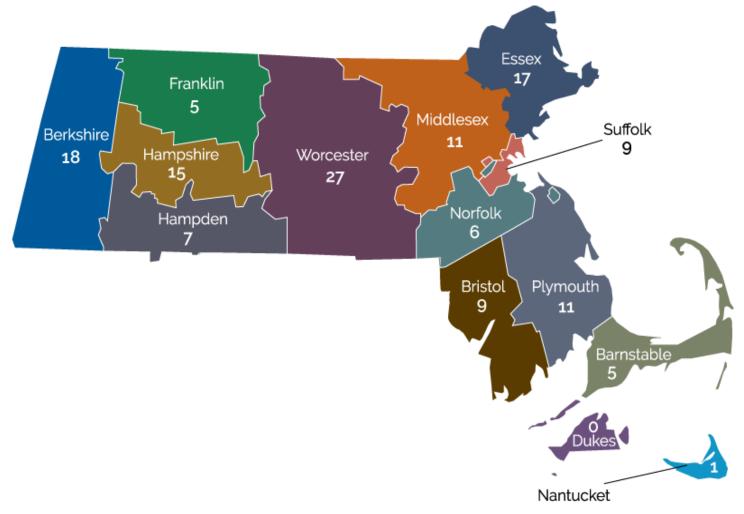
County	+/-
Barnstable	
Berkshire	
Bristol	+3
Dukes	
Essex	+3
Franklin	
Hampden	+2
Hampshire	+2
Middlesex	+2
Nantucket	
Norfolk	
Plymouth	+5
Suffolk	+1
Worcester	+3
Total	+21





## **Retail Applications | April 25, 2019**

County	+/-
Barnstable	
Berkshire	
Bristol	+1
Dukes	
Essex	+3
Franklin	
Hampden	
Hampshire	+2
Middlesex	+1
Nantucket	
Norfolk	
Plymouth	+2
Suffolk	+1
Worcester	+1
Total	+11





#### **Agent Applications | April 25, 2019**

4,905 Total Agent Applications:

288 Total

283 Pending Establishment Agents

5 Pending Laboratory Agents

- 300 Withdrawn
- 686 Incomplete
- 220 Surrendered
- 3,411 Approved

## Of Total Pending:

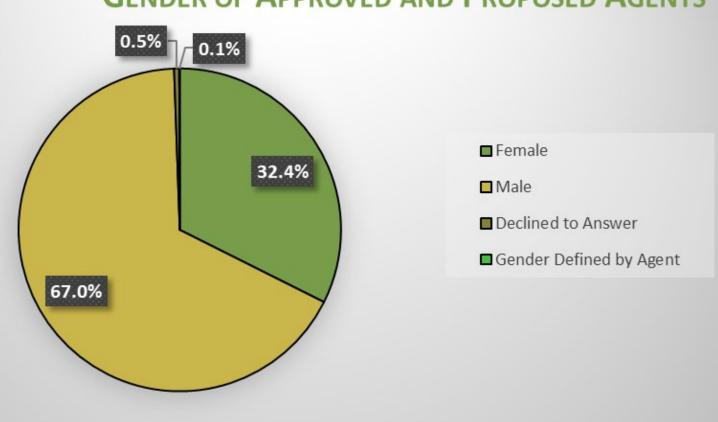
- 187 not yet reviewed
- 98 CCC requested more information
- 3 awaiting third party response
- 0 Review complete; awaiting approval

#### **Agent Applications | April 25, 2019**

#### **Demographics of Approved and Pending Agents**

# GENDER OF APPROVED AND PROPOSED AGENTS

Gender	#	%
Female	1198	32.4
Male	2480	67.0
Declined to Answer	19	0.5
Gender Defined by Applicant	2	0.1
Total	3699	100.0

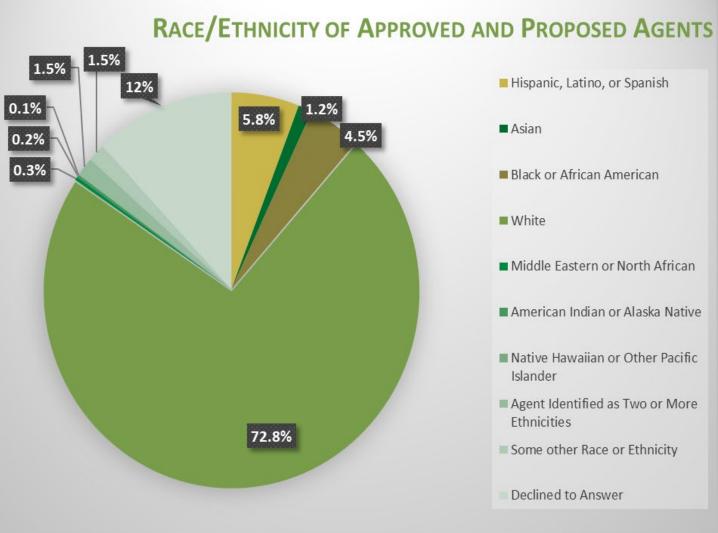




#### **Agent Applications | April 25, 2019**

#### **Demographics of Approved and Pending Agents**

Race/Ethnicity	#	%
Hispanic; Latino; Spanish	216	5.8
Asian	44	1.2
Black; African American	168	4.5
White	2693	72.8
Middle Eastern; North African	11	0.3
American Indian; Alaska Native	8	0.2
Native Hawaiian; Other Pacific Islander	2	0.1
Identified as Two or More Ethnicities	57	1.5
Other Race or Ethnicity	55	1.5
Declined to Answer	445	12.0
Total	3699	100.0







## Medical Marijuana Program Data | April 25, 2019

MMJ Metrics	#
RMDs with expired PCRs	4
RMDs with PCRs	103
RMDs with FCRs not approved to sell	5
RMDs with FCRs and selling	49



# **Social Equity Program Application | April 25, 2019**

Applications	#
Complete and pending review	229
Incomplete	222
Total to date	451

Completed Application Breakdown	#	%
Female	68	29.7 %
Male	158	69 %
Declined to Answer (Gender)	2	0.9 %
User Defined Gender	1	.4 %
Farmer	21	9.2 %
Veteran	14	6.1 %
EEA Recipient	34	15 %
Asian	7	3.1 %
Black or African American	91	39.7 %
Hispanic, Latino, or Spanish	32	14 %
White	43	18.8 %
Two or more	37	16.1 %
Other	8	3.5 %
Decline to answer	11	4.8 %



## **Social Equity Program Application | April 25, 2019**

#### Applications Received from 84 Cities, Towns, and Neighborhoods Across the Commonwealth

Abington	Dorchester	Hyde Park	North Adams	South Walpole
Agawam	Dorchester Center	Indian Orchard	North Andover	Southbridge
Ashby	Douglas	Jamaica Plain	North Grafton	Spencer
Auburn	East Boston	Lawrence	Norton	Springfield
Ayer	East Bridgewater	Lynn	Onset	Stoughton
Bedford	East Longmeadow	Malden	Pocasset	Swampscott
Boston	Everett	Marion	Quincy	Taunton
Braintree	Fall River	Marshfield	Randolph	Tewksbury
Brockton	Fiskdale	Mattapan	Revere	Wakefield
Cambridge	Foxboro	McDonough	Rockland	Walpole
Charlestown	Framingham	Milford	Roslindale	Waltham
Chelsea	Gill	Milton	Roxbury	Watertown
Chicopee	Hampden	Monson	Royalston	West Springfield
Clinton	Holliston	Natick	Salem	Westborough
Conway	Holyoke	New Bedford	Saugus	Woburn
Danvers	Hudson	Newton	Shelburne Falls	Worcester
Dedham	Hyannis	Newton Center	Somerville	



# **Social Equity Program Application | April 25, 2019**

Applications	#
Complete and pending review	229
Incomplete	222
Total to date	451

Completed Application Track Breakdown	#	%
Entrepreneurial	168	
Craft Marijuana Cooperative	4	
Marijuana Cultivation		
Marijuana Microbusiness	8	73.4%
Marijuana Product Manufacturer	6	73.470
Marijuana Retailer	29	
Third Party Marijuana Transporter	4	
Two or More (includes all license types)	113	
I do not expect to seek a license in the future	1	
Re-entry, Entry	27	
Retail	12	11.8%
Cultivation	9	11.070
Testing	2	
Product Manufacturing	4	
Core	14	6.1%
Ancillary	20	8.7%



# **Demographics of Pending Social Equity Applications: Entrepreneur Track**

Race/Ethnicity	#
Hispanic; Latino; Spanish	22
Asian	5
Black; African American	70
White	26
Middle Eastern; North African	0
American Indian; Alaska Native	
Native Hawaiian; Other Pacific Islander	0
Identified as Two or More Ethnicities	31
Other Race or Ethnicity	5
Declined to Answer	9
Total	168

Gender	#
Male	117
Female	50
Declined to Answer	1
Total	168



# **Demographics of Pending Social Equity Applications: Re-entry/Entry Track**

Race/Ethnicity	
Hispanic; Latino; Spanish	5
Asian	0
Black; African American	9
White	8
Middle Eastern; North African	
American Indian; Alaska Native	
Native Hawaiian; Other Pacific Islander	
Identified as Two or More Ethnicities	
Other Race or Ethnicity	
Declined to Answer	
Total	27

Gender	#
Male	20
Female	6
Declined to Answer	1
Total	27



# **Demographics of Pending Social Equity Applications: Core Track**

Race/Ethnicity	
Hispanic; Latino; Spanish	1
Asian	0
Black; African American	6
White	4
Middle Eastern; North African	
American Indian; Alaska Native	
Native Hawaiian; Other Pacific Islander	
Identified as Two or More Ethnicities	
Other Race or Ethnicity	
Declined to Answer	
Total	

Gender	#
Male	10
Female	1
User Defined Gender	1
Total	14





# **Demographics of Pending Social Equity Applications: Ancillary Track**

Race/Ethnicity	#
Hispanic; Latino; Spanish	4
Asian	2
Black; African American	6
White	5
Middle Eastern; North African	0
American Indian; Alaska Native	0
Native Hawaiian; Other Pacific Islander	0
Identified as Two or More Ethnicities	2
Other Race or Ethnicity	1
Declined to Answer	0
Total	20

Gender	#
Male	11
Female	9
Total	20





#### **Staff Recommendations on Final Licenses**

- a) CommCan, Inc. (# MC281642), Cultivation Tier 5 / Indoor
- b) CommCan, Inc. (# MP281508), Product Manufacturing
- c) Garden Remedies, Inc. (# MR281942), Retail
- d) Rise Holdings, Inc. (# MR281254), Retail



#### **Staff Recommendations on Provisional Licenses**

- a) Emerald Grove, Inc., Vertically Integrated Medical Marijuana Treatment Center/RMD
- b) Green Meadows Farm, LLC., Vertically Integrated Medical Marijuana Treatment Center/RMD
- c) Health Circle, Inc. (# MCN281787), Cultivation Tier 3 / Indoor
- d) Health Circle, Inc. (# MPN281533), Product Manufacturing
- e) Health Circle, Inc. (# MRN281426), Retail
- f) Mass Yield Cultivation, LLC. (# MCN281392), Cultivation Tier 2 / Indoor
- g) Nature's Remedy of Massachusetts, Inc. (# MRN281553), Retail
- h) Nature's Remedy of Massachusetts, Inc. (# MRN282049), Retail



## **Staff Recommendations on Change of Ownership Applications**

- a) Alternative Therapies Group, Inc.
- b) Caregiver-Patient Connection
- c) East Coast Organics, LLC



## **Commission Discussion and Votes**

- a) Guidance Document: Renewals
- b) Software Contract Amendment
- c) Regulatory Policy Discussion



#### **Regulatory Review: Policy Considerations for Commission Discussion**

# Topics and Themes

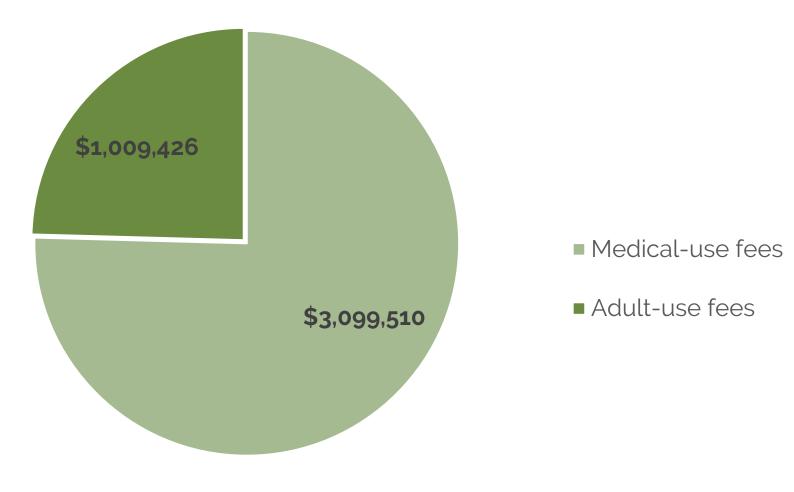
- 1 Fees
- 2 Application Process
- 3 Social Consumption
- 4 Delivery
- 5 Hardship Cultivation
- 6 Operational and Other Issues





# 1 Fees: Medical- and Adult-use FY19 Revenue Collections

FY19 YTD Revenue Collections (as of 3/31/19)







# 1 Fees: Adult-use Current Fee Structure—Cultivation

	Application Fees	Annual License Fee
License Types	(Indoor/Outdoor)	(Indoor/Outdoor)
Indoor or Outdoor Cultivator		
Tier 1: up to 5,000 square feet	\$200 (I)/\$100 (O)	\$1,250 (I)/\$625 (O)
Tier 2: 5,001 to 10,000 sq. ft.	\$400 (I)/\$200 (O)	\$2,500 (I)/\$1,250 (O)
Tier 3: 10,001 to 20,000 sq. ft.	\$600 (I)/\$300 (O)	\$5,000 (I)/\$2,500 (O)
Tier 4: 20,001 to 30,000 sq. ft.	\$600 (I)/\$300 (O)	\$7,500 (I)/\$3,750 (O)
Tier 5: 30,001 to 40,000 sq. ft.	\$600 (I)/\$300 (O)	\$10,000 (I)/\$5,000 (O)
Tier 6: 40,001 to 50,000 sq. ft.	\$600 (I)/\$300 (O)	\$12,500 (I)/\$6,250 (O)
Tier 7: 50,001 to 60,000 sq. ft.	\$600 (I)/\$300 (O)	\$15,000 (I)/\$7,500 (O)
Tier 8: 60,001 to 70,000 sq. ft.	\$600 (I)/\$300 (O)	\$17,500 (I)/\$8,750 (O)
Tier 9: 70,001 to 80,000 sq. ft.	\$600 (I)/\$300 (O)	\$20,000 (I)/\$10,000 (O)
Tier 10: 80,001 to 90,000 sq. ft.	\$600 (I)/\$300 (O)	\$22,500 (I)/\$11,250 (O)
Tier 11: 90,001 to 100,000 sq. ft.	\$600 (I)/\$300 (O)	\$25,000 (I)/\$12,500 (O)
_		





# 1 Fees: Adult-use Staff Recommendation for Commission Discussion

#### **Cultivation Licenses**

- First three tiers remain at the same fee (up to 20,000 sq. ft.) to ensure a reduced barrier to entry
- All tiers following will increase to cover operational costs
- Application fees: \$1500 for indoor tiers 4 and up (originally \$600) and \$1000 for outdoor tiers 4 and up (originally \$300)
  - Increased fees will adequately account for staffing time required for the application, inspectional, and overall licensing process.





# 1 Fees: Adult-use Proposed Fee Structure—Cultivation

	Application Fees	Annual License Fee
License Types	(Indoor/Outdoor)	(Indoor/Outdoor)
Indoor or Outdoor Cultivator		
Tier 1: up to 5,000 square feet	\$200 (I)/\$100 (O)	\$1,250 (I)/\$625 (O)
Tier 2: 5,001 to 10,000 sq. ft.	\$400 (I)/\$200 (O)	\$2,500 (I)/\$1,250 (O)
Tier 3: 10,001 to 20,000 sq. ft.	\$600 (I)/\$300 (O)	\$5,000 (I)/\$2,500 (O)
Tier 4: 20,001 to 30,000 sq. ft.	\$1500 (I)/\$1000 (O)	\$17,500 (I)/\$13,750 (O)
Tier 5: 30,001 to 40,000 sq. ft.	\$1500 (I)/\$1000 (O)	\$20,000 (I)/\$15,000 (O)
Tier 6: 40,001 to 50,000 sq. ft.	\$1500 (I)/\$1000 (O)	\$22,500 (I)/\$16,250 (O)
Tier 7: 50,001 to 60,000 sq. ft.	\$1500 (I)/\$1000 (O)	\$25,000 (I)/\$17,500 (O)
Tier 8: 60,001 to 70,000 sq. ft.	\$1500 (I)/\$1000 (O)	\$35,000 (I)/\$20,750 (O)
Tier 9: 70,001 to 80,000 sq. ft.	\$1500 (I)/\$1000 (O)	\$38,000 (I)/\$22,000 (O)
Tier 10: 80,001 to 90,000 sq. ft.	\$1500 (I)/\$1000 (O)	\$41,500 (I)/\$23,250 (O)
Tier 11: 90,001 to 100,000 sq. ft.	\$1500 (I)/\$1000 (O)	\$45,000 (I)/\$25,500 (O)





# 1 Fees: Adult-use Current Fee Structure—Other License Types

Craft Marijuana Cooperative	Total fees for its canopy.	Total fees for its
	If more than six locations,	canopy.
	add	If more than six
	\$200 (I)/\$100(O)	locations, add
	per additional location.	\$1,250(I)/\$625(O)
		per additional location.
Microbusiness	\$300	50% of
		all applicable fees
Manufacturing	\$300	\$5,000
Independent Testing Laboratory	\$300	\$5,000
Retail (brick and mortar)	\$300	\$5,000
Third-party Transporter	\$300	\$5,000
Existing Licensee Transporter	\$300	\$5,000
Research Laboratory	\$300	\$1,000





# 1 Fees: Adult-use Staff Recommendation for Commission Discussion

# Other License types

- No changes to the following in order to ensure reduced barriers to entry:
  - Microbusinesses (Except if manufacturing)
  - Retail
  - Third-party Transporter
  - Research Laboratory
- Increases to Manufacturing, Independent Testing Laboratory, and Existing Licensee Transporter:
  - Application fee from \$300 to \$1,000
  - Annual fee from \$5,000 to \$10,000





# 1 Fees: Adult-use Proposed Fee Structure—Other License Types

Craft Marijuana Cooperative	Total fees for its canopy.	Total fees for its
	If more than six locations,	canopy.
	add	If more than six
	\$200 (I)/\$100(O)	locations, add
	per additional location.	\$1,250(I)/\$625(O)
		per additional location.
Microbusiness	\$300	50% of
		all applicable fees
Manufacturing	\$1000	\$10,000
Independent Testing Laboratory	\$1000	\$10,000
Retail (brick and mortar)	\$300	\$5,000
Third-party Transporter	\$300	\$5,000
Existing Licensee Transporter	\$1000	\$10,000
Research Laboratory	\$300	\$1,000



# 1 Fees: Adult-use Other Fees

## **Current Fees**

Name Change Fee	\$100
Location Change Fee	50% of applicable License Fee
Change in Building Structure Fee	\$500
Change in Ownership or Control Fee	\$500

# Proposed Fees

Name Change Fee	\$1000
Location Change Fee	50% of applicable License Fee
Change in Building Structure Fee	\$1000
Change in Ownership or Control Fee	\$1000
Architectural Review Request Fee	\$1000





# 1 Fees: Adult Use—Other License Types

## **Decision Point:**

Adopt staff recommendation for application and license fees.





# Fees: Medical Current Fees RMD Agent Registration, Annual \$500 \$1,500 Medical-use Application of Intent (Phase 1) Medical-use Management and Operations Profile Application (Phase 2) \$30,000 \$50,000 RMD Registration, Annual (and Renewal of Registration) Location change \$10,000 Name change \$100 \$8.25 per \$100 cost of construction costs, with a Architectural review minimum of \$1,500





### 1 Fees: Medical Staff Consideration for Commission Discussion

Leave Medical Marijuana Treatment Center fees unchanged, but change the payment and application structure

- Application process would be restructured to combine the two currently phased fees of \$1,500 and \$30,000
- Application fee would become \$31,500, requiring one payment on submission application
- License fee after approval of Provisional License (and on renewal) \$50,000





## 1 Fees: Medical Proposed Fees

MTC Agent Registration, Annual	\$500
MTC Application	\$31,500
MTC Initial and Annual License	\$50,000
Name Change	\$1,000
Location Change	50% of applicable license fee
Change in Building Structure	\$1,000
Change in Ownership or Control	\$1,000
Architectural Review Request	\$1,000



### 1 Fees: Medical

### **Decision Point:**

Adopt staff recommendation for application and license fees associated with the medical program





## 1 Fees: Patients

Notes for consideration:

Elimination of patient fees in entirety would:

- result in projected revenue loss of over \$2M
- provide administrative efficiencies for approval of patient applications
- remove the fee waiver process, which has been noted as a barrier for some patients
- be directly responsive to a longtime patient and patient advocate request

#### Decision point options:

- 1. Maintain \$50 patient fee and waiver process, as currently established; or
- 2. Eliminate \$50 patient fees across the board; or
- 3. Eliminate \$50 patient fee for some categories of patients (e.g., veterans)





### 2 Application Process: Staff Recommendations for Commission Discussion

- Elimination of the multi-tiered approached for the medical program as well as the 4 packet approach in the adult-use program.
- Move to one application process for medical- and adult-use applications in order to streamline the review processes and gain efficiencies across both programs
- Application requirements would be the same across both medical- and adult-use programs
  - Exceptions:
    - 1. MTC applicants would be required to provide information pertaining to home delivery for patients.
    - 2. "Compassion program plans" be submitted with similar requirements as positive impact and diversity plans.
- Removal of the "packet" approach would
  - Allow technological advances within the portal including:
    - Workflow tracking
    - Enhanced reporting



### 2 Application Process:

#### **Decision Points:**

- 1. Adopt staff recommendation to unify application requirements and process across programs, including bringing the medical application process into the existing online portal used for adult-use applications
- 2. Adopt staff recommendation to eliminate 4 individual packets in favor of one.





## 2 Application Process: Ownership and Control Staff Recommendations for Commission Discussion

- Rather than the Commission requesting contracts or agreements relative to control (e.g. management contracts), require the submission of these materials upon submission of application.
- Requirements will be the same across both programs and would:
  - Provide definition of Persons or Entities Having Direct or Indirect Control:
    - O Any person or entity having direct or indirect control over operations of a Marijuana Establishment. It specifically includes any director, manager, assistant manager, and supervisor who oversees, at any point, any part of a cultivation, product manufacturing, retail, transportation, or laboratory operation of a proposed or licensed Marijuana Establishment. It specifically includes any an entity that is a direct or indirect holding or parent company of the applicant and the chief executive officer and executive director of those companies.
    - Purpose of proposed change: to explicitly inform applicants and licensees that certain positions inherently have control and to ensure that all related entities having control are fully disclosed.



## 2 Application Process:

#### **Decision Points:**

- 1. Adopt staff recommendation to require submission of applicable contracts and/or agreements within the initial application.
- 2. Adopt staff recommendation defining Persons or Entities Having Direct or Indirect Control.





## 2 Application Process: Ownership, Control, and Suitability Considerations for Commission Discussion

- Add ownership and control enforcement mechanism: Failure to comply with limitations may be basis for initial licensure denial, revocation of license, or denial of renewal.
- Add mandatory disqualification of 5 years for Marijuana Establishment licensees identified on an application that have licenses revoked or similarly terminated in other jurisdictions
- Add presumptive negative determination after 5 years for Marijuana Establishment licensees
   identified on an application that have licenses revoked or similarly terminated in other jurisdictions

**Decision Point:** 

Adopt recommendations as proposed.





# 3 Social Consumption Working Group Update

The Social Consumption Working Group was created to advise Commission staff on regulatory parameters for the topic of Social Consumption.

The Working Group will finalize recommendations in advance of the next Commission meeting on May 16.

### Working Group Members

- Thomas Bernard, Mayor, North Adams
- Alisa Brewer, Councilor, Amherst
- Helen Caulton-Harris, Commissioner of the Division of Health and Human Services, Springfield
- Michael Fenton, Councilor, Springfield
- David Gardner, Assistant Town Manager, Provincetown

- Steven Hoffman, Chairman, Massachusetts
   Cannabis Control Commission
- Doug Kress, Director of Health & Human Services, Somerville
- Alex Mello, Planner, Somerville
- Shaleen Title, Commissioner, Massachusetts
   Cannabis Control Commission



3 Social Consumption Working Group Key Issues

Preventing Underage Access

Preventing Impaired Driving

Employee Protection from 2<sup>nd</sup> hand smoke

Adequate consumer education to minimize overconsumption

Staff training to detect impairment and minimize overserving

### Pilot program:

- Promote and encourage certain groups in accordance with Commission's February 2018 vote
- Start small with limited number of municipalities
- Robust collection and analysis of data





# 5 Hardship Cultivation: Medical Staff Considerations for Commission Discussion

- Staff recommendations and considerations for moving forward with implementation:
  - Make explicit in regulations that the hardship cultivation registration process is available to those under 21 years old who qualify and are looking to cultivate plants to meet their medical needs.
  - In addition to demonstrating hardship require:
    - 1. that a person applying for a hardship cultivation registration demonstrate, with documentation from a Certifying Healthcare Provider, the need to grow more than the 6 plants already permitted by law.
      - Plants allowed over 6 will be limited by a cap, but Commission decision needed on appropriate cap and whether to allow for application of waiver from that cap
    - 2. Demonstration that the issuance of a hardship cultivation registration would not pose a risk of diversion



## 5 Hardship Cultivation:

### **Decision Points:**

- 1. Adopt staff recommendations for implementation of hardship cultivation.
- 2. Adopt a cap of \_\_\_\_ plants for implementation of hardship cultivation.

### If a cap is adopted:

3. Allow/Do not allow for application of waiver from the cap.



#### **Upcoming Public Meetings**

## **Cannabis Control Commission Public Meeting**

## **Cannabis Advisory Board Public Meeting**

April 26, 2019 (if necessary)
11:30AM
Department of Transportation
10 Park Plaza
Boston, MA 02116

May 16, 2019 10:00AM Health Policy Commission 50 Milk Street, 8<sup>th</sup> Fl., Boston, MA 02109 May 23, 2019
2:00PM
Department of Transportation
10 Park Plaza
Boston, MA 02116

