

**From the Office of Michael Latulippe, Registered Qualifying Patient Advisor
to the Cannabis Control Commission**

Onsite Consumption Marijuana Retailers

I've been developing some basic elements to an onsite consumption retailer license here in Massachusetts. Some of the basic tenets are:

1. **51% rule** - Because of the wide range of businesses and services possible combining with marijuana the draft regulations propose that businesses can apply to become an onsite consumption marijuana retailer in cases where at least 51% of the business will be marijuana sales. This ensure the state has a significant revenue stake in any onsite consumption marijuana establishment and that a wide range of businesses can apply to become an onsite marijuana retailer including bar style establishments to yoga studios and massage therapy studios.
2. **0.35 Ounces Daily Limit** - Daily purchase limits are derived from the maximum allowable daily exposure limitations put forth in the medical marijuana program's laboratory testing protocols. Safe exposure limits per day include 10 grams for flower, 2 grams of concentrate, and 1400mg of either edible or non-edible marijuana infused products or any combination thereof.
3. **Serving Size Limits** - Limitations on serving sizes for onsite consumption marijuana retailers are suggested including 10mg for edible marijuana infused products, 50mg for non-edible infused products, 1/10 of a gram for concentrates, and 0.25 gram for flower.
4. **Tracking sales through a Lockbox Point of Sale** - All transactions will be tracked and taxes recorded through a secure point of sale system only accessible by the Commission during inspections and auditing procedures. The lockbox point of sale will not collect any personal information but will warn on-site retail agents if a consumer is approaching their daily purchase limit and will not let them exceed such daily purchase limits.
5. **Local Choice** - Creates a pathway for a diversity of marijuana establishments that can retail marijuana to consumers and marijuana products/infusions including clubs, hotels, restaurants, veterans organizations, yoga studios, massage studios and more to fulfill on municipalities required number of marijuana establishments.

6. **Creates Four License Categories** - Licensing categories including onsite consumption marijuana retailers that can sell all forms of marijuana and/or marijuana products including those inhaled, ingested, or applied on the skin, one license for only smoking/vaporizing, one license for only ingesting marijuana onsite, and one license for only dermal application of marijuana infused products.

7. **Creates Short term event licensing at indoor/outdoor locations** - Develops a framework for the Commission and local licensing authorities to develop short term event licenses that allow the sale of marijuana and/or marijuana products/infusions by an event licensee.

8. **Municipal Discretion and Oversight** - These proposed regulations will give municipalities a choice on whether to further restrict the categories of onsite consumption marijuana retailers that can apply in their municipality while also giving municipalities the option to further reduce the onsite daily consumption limits in these retailers as long as it does not crossover into being unreasonably impracticable as defined in Chapter 55.

9. **Marijuana Infusions** - Develops a pathway for onsite consumption marijuana retailers to combine neutral food and beverages with marijuana such as a juice bar, coffee shop, restaurant, or other business that requires onsite infusion.

10. **Impairment Detection Education** - Requires the Commission to work with law enforcement and other state agencies to develop required education for on-site retail agents on impairment detection in the consumers they serve.

11. **Reusable Packaging** - In order to prevent environmental concerns as well as unneeded exposure to marijuana packaging for children and pets our proposal calls for reusable packaging that can be cleaned according to Commission standards and reused by the following consumer.

12. **Strong Air Purification Standards & Employee Protections** - Requires the Commission to develop strong air ventilation standards and also requires smoke free areas inside the onsite consumption marijuana retailer for employees that do not wish to be exposed to marijuana smoke or vapor.