

CANNABIS INDUSTRY SUBCOMMITTEE RECOMMENDATIONS

I. Licensing, Registration and Manufacturing

- A. The legislation calls for virtual separation of medical and adult use marijuana—how should this be done?

Recommendation: Virtual Separation of medical and adult use marijuana should be done at the point of sale. All co-located retail medical/adult use marijuana establishments will be required to possess and operate software capable of tracking and distinguishing sales for adult use and medical patients.

- B. The legislation prohibits individuals under 21 being allowed on the premises of a Retail Marijuana Establishment, but how will registered qualifying patients over 18 but under 21 have access to medication?

Recommendation: Both Adult Use and Medical Marijuana can be conducted on site by Virtual Separation. 18-21 year old registered patients with a valid registration card are allowed in the limited access area, if that Retail Marijuana Establishment is a licensed Medical Marijuana Treatment Center.

- C. What energy and environmental and waste disposal standards for licensure and licensure renewal of marijuana establishments licensed as a marijuana cultivator or marijuana product manufacturer does the subcommittee recommend?

Recommendation: We recommend adopting existing DPH waste disposal standards as identified in 105 CMR 720.105 (J) (p.31). Energy and environmental standards must, at a minimum, be commensurate with Municipal Requirements. See 105 CMR 725.600 (p.50).

- D. What standards for manufacturing or extracting cannabinoid oils or ~~butane hash~~ oil/hydrocarbon solvent does the subcommittee recommend?

Issue: Should the regulations specify minimum safety standards for specified types of hydrocarbon solvent extraction systems?

Recommendation: We recommend that the New NFPA be adopted toward the industry, with a consideration for a date to allow time for existing operators to get their facilities up to code. See the City of Denver's Marijuana Extraction Guidelines for Commercial/Licensed Facilities.

- E. The law allows the licensing of ancillary businesses, such as marijuana distributors, marijuana storage, laboratories and marijuana transportation.

- a. What recommendations do you have regarding the regulations of these ancillary businesses and are there other ancillary businesses that should be considered?

Recommendation 1: The Commission should place initial exclusive focus on creating regulations, guidelines, and protocols necessary for the issuance of licenses by April 1, 2018. To this end, we recommend addressing licensing for ancillary businesses, social consumption, and other marijuana establishments outside the scope identified in G. L. c. 94G, §§ 4(a)(1)-(15), 15 be reserved for Phase II of regulatory promulgation.

- F. What training requirements should there be for retail dispensary and cultivation/processing~~marijuana establishment~~ employees?

- a. The law requires qualifications for licensure and minimum standards for employment that are directly and demonstrably related to the operation of a

marijuana establishment and similar to qualifications for licensure and employment standards in connection with alcoholic beverages as regulated under chapter 138 of the General Laws.

Recommendation 1: Marijuana Establishment owners may choose to send their employees to a live, in-person, training program that is akin to TIPS or ServSafe Alcohol Certification classes.

Recommendation 2: Owners who choose to participate will receive a reduced fine for a specified list of infractions.

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