

CANNABIS INDUSTRY SUBCOMMITTEE RECOMMENDATIONS

I. Tier Measurement

DEFINITIONS:

Need to define Indoor and Outdoor

- A. What measurement should be used for the tiers: Number of plants, canopy, or another measurement?

Issue 1: Tier Measurement

Recommendation 1: Working group recommends that tier measurement be expressed as follows:

- a. For Indoor Cultivation: square feet of bench space allocated for the flowering stage of cannabis plant development.
- b. For Outdoor Cultivation: Still discussing

Using your recommended system of measurement, what should the dividing line for each tier be?

Issue 1: Tiers

Recommendation 1: Maximum Bench/Area Size Limits. Flower stage only.

- (A) Indoor Production.
 - (A) Micro tier I: Up to 1,000 square feet.
 - (B) Tier I: 1,001 to 5,000 square feet.
 - (C) Tier II: 5,001 to 10,000 square feet.

- (D) Tier III: 10,001+ square feet (proportionate fee associated with each additional 5,000 square feet.)
- (B) Outdoor production.
 - (A) Micro tier I: Up to 4,000 square feet.
 - (B) Tier 1: 4,001 to 20,000 square feet.
 - (C) Tier II: 20,001 to 40,000 square feet.
 - (D) Tier III: 40,000+ square feet (proportionate fee associated with each additional 5,000 square feet.)
- B. What is the subcommittee's recommendation regarding requirements for record keeping by marijuana establishments and procedures to track marijuana cultivated, processed, manufactured, delivered or sold by marijuana establishments?

Issue 1: Tracking System Requirements

Recommendation 1: Workgroup believes all growers need a seed to sale tracking system – system for tracking/technology should be publicly available to ensure that all growers have access to a tracking application/programming interface seed-to-sale tracking system. Access to the system should not be prohibitively expensive for all Tiers of producers. Requirements should mimic the current medical regulations for all producers.

- C. What are the subcommittee's recommendations regarding minimum standards for the requirement that all licensees possess and operate an interoperable publicly available application programming interface seed-to-sale tracking system sufficient to ensure

the appropriate track and trace of all marijuana cultivated, processed or manufactured pursuant to this chapter?

Issue 1: Tracking System Requirements

Recommendation 1: Use existing medical model for all cultivation; insure outdoor standards match medical for product safety; develop best ag practices for outdoor cultivation.

- Testing: The Commonwealth should under no circumstances lower any testing requirements for any cannabis producers. The medical testing requirements are some of the toughest in the country and they should be. Public health and safety deserves no less. Mirror medical testing requirements for all producers.
- Indoor and Outdoor producers shall be subject to all DPH testing requirements.
- Indoor and Outdoor producers shall be subject to additional existing agricultural regulations: nutrient management, pesticide regulations, etc.
- What best agricultural practices do we want to encourage?
 - compost any waste materials
 - energy usage
 - nutrient management
 - etc.

Issue 2: Open RFQ/RFP Process be undertaken for a tracking platform.

Recommendation: The Commonwealth should go out to bid for the procurement process to obtain vendors that can provide a seed to sale tracking process.

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