

New Jersey Cannabis Regulatory Commission
Public In-Writing Comments
Public Meeting: July 13th, 2021

Sender	Date	Comment/Question
Charles Johnson	6/3/2021	<p>Good Evening,</p> <p>My name is Charles Johnson, co founder and CEO of LeafSpotZ. LeafSpotZ is an African American cannabis transportation and logistics software company that will be applying for a class 4 distribution license.</p> <p>Questions/comments for CRC:</p> <p>1) To ensure that cultivator and manufacturer classes do not find loop holds in the legislation language, will the CRC create a robust plan including details of what is the determined threshold amount meaning of “transportation of cannabis products in bulk” under the Class 4 definition to ensure Class 4 license holders can operate effectively in a fair market?</p> <p>2) With majority of discussion pertaining to minority participation in microbusiness licenses, will the CRC ensure that there are minority owned businesses equally reflected in the awarding of regular (annual) class 4 licenses?</p> <ul style="list-style-type: none"> - There are black businesses that aspire to go for regular (annual) class 4 licenses that aren’t being taken into consideration when it comes to minority participation conversations. <p>3a) Regarding the minority ownership threshold of 51%, how will that apply to businesses who have minority cofounders that both own 50% each?</p> <ul style="list-style-type: none"> - 3b) Will cofounders be calculated at a combined ownership interest of at least 51% if they obtain outside investors whom hold both a financial and ownership interest? <p>4) Regarding significantly involved persons and “decision making authority” in the definition section of the legislation, will the CRC define board seats as meeting the decision making authority criteria legislatively defined?</p>

		<p>5a) If a company that is going for a class 4 license have to submit a separate applications if they plan to utilize 2 locations or will the CRC allow that to be placed under one application filing?</p> <p>- 5b) will the CRC provide an option on the application to select whether an applicant is pursuing more than one location?"</p>
Jamie Campbell	6/3/2021	<p>Is this meeting viewable anywhere? It seems it's been removed from the website.</p> <p>Thanks Jamie Campbell</p>
Matt Ward	6/9/2021	<p>This is a request to speak to someone at CRC that can discuss specifics about ordinances related to municipalities. I am the supervising planner for the City of Jersey City , working on local zoning ordinances regarding cannabis establishments and would benefit for a discussion. Thank you.</p>
Steve	6/11/2021	<p>When will the canmabis being sold in this state be tested for pesticides, metals, etc....without testing you do not have an established market. You are putting peoples health at risk.</p>
Brett Murray	6/16/2021	<p>After this past February’s historic bill signing, Governor Murphy estimated it would take about (6) months to establish a cannabis marketplace.</p> <p>Can the committee comment if the August-2021 goal is still achievable, and provide an updated milestones/timeline for NJ to be “open for business”</p>
Dishen Patel	6/17/2021	<p>We will be applying for a retail dispensary license in NJ as a franchisee of Unity Rd (publicly traded leading cannabis franchisor and cultivator) and having experience in this industry and retail in general, i wanted to make sure the supply will meet the demand. I wanted to ask what the lead time will be from getting the cultivators up to speed in providing the supply for the retail shops. I understand from MA it took almost 4-5 years before retail demand caught up with the supply from cultivators. Will NJ be cautious about this and have learned from this?</p> <p>Second question is short, what type of lead time if any will a cultivator have to retail to ensure the supply meets the demand and so retail dispensary owners do not have to sit on a site for that long before obtaining the inventory?</p>
Chris Connolly	6/26/2021	<p>Could you please explain, are you sworn to the US constitution and NJ state constitution? Furthermore, with the Cole memo being rescinded by a former US Attorney General and to my knowledge no further legal guidance from our current US Attorney General how does your commission continue to operate? Marijuana continues to be a dangerous, smelly substance that is illegal at the federal level. Thank you.</p>

<p>Carlos Jaramillo</p>	<p>6/26/2021</p>	<p>Good Day Sir/Madam.</p> <p>Just some quick comments. I am a New Jersey resident, licensed allied health professional in New Jersey and also a LP in Jamaica. I have experienced the process and would love to be a stake holder in New Jersey. My team consists of minority and women along the operation chain in our company. The experience I gained from multiple meetings with the regulatory board members, to creating a company in a NEW industry, successfully opening bank accounts and managing a staff that consist on international personnel is second to none.</p> <p>Some suggestions I feel can assist the Micro business aspect for disenfranchised groups and communities have to centered around Involvement. One way could be notifying these same communities of opportunities at the grass roots level on how they can be apart of the new future in an industry that seventy percent of our residents voted for, and is no longer consider a taboo. This could be achieved through multiple mediums. Another way is to involve large corporations seeking license, to assist the Micro business in some way or another, could be made a mandate. It could be whichever way the board deems appropriate. Loans/Grants with no interest, assistance programs for start up, also, purchase agreements in place that will be honored, are just some of the ways we could provoke our thoughts around.</p> <p>Also in the interest for success in a new industry I would highly encourage some sort of Pilot Programs could be put in place so we can learn what will work and what want, especially for the Micro businesses. This will save folks a lot of money. It would be education from the ground up which can be used as a model.</p> <p>Again some quick comments, I love the direction the commission is heading, the good balance have to be there though to ensure success for all involved. I am available for any questions, would love to be on the next call, talk soon</p> <p>Cheers Carlos</p>
<p>Michael Skolnick</p>	<p>7/6/2021</p>	<p>Hi I was registered as a speaker for the meeting. Unfortunately I have been hospitalized since June 26 at Jefferson hospital in Sewell nj. Came in for a routine appendectomy and have had complication after complication. I just had a 2nd surgery last night. Due to this I do not even see being out of the hospital by the 13th. I pray I will but if I'm not I didn't wanna miss my chance to speak but I wanted to be respectful and make sure I let you know why I most likely won't be able to attend this meeting. So please do not think I'm blowing off the meeting I just need to get better and I pray this second surgery will get me on the right path. So again please forgive me if I can't attend. And I do look forward to another opportunity if possible once I'm better. Thank you so much.</p>

<p>Marc Liebeskind</p>	<p>7/7/2021</p>	<p>Hello, we are interested in becoming cultivators and distributors in NJ, but are unable to find any real information about how to do this. Your website phone number does not work, there is not way to communicate with the CRC, and your website does not list any information that I can see on licensing and other requirements. Where can this information be found and can you update your website to a) provide an email address and phone number to reach you? b) a resource of information on licensing and other information necessary to operate a cannabis business. Thank you.</p>
<p>Robertino Fillari</p>	<p>7/7/21</p>	<p>The fact that you are dedicating significant time to setting rules on advertising and packaging/labeling while patients are stuck with the same low quality products from half a decade ago is absurd.</p> <p>Here is what we want for packaging/labeling: Clearly labeled with testing information on the label or accessible via QR code on the label. No silly rules about being too pretty or too colorful or maybe will appeal to children. That doesn't work.</p> <p>Advertising rules? Make it same as alcohol or tobacco. Done.</p> <p>Now how about you move onto the real subjects like expanding product availability for the medical program in the meantime? How about licenses for micro-grows so people can get started? Maybe address how the current system only serves to extract money from residents and put it in the pockets of big cannabis business? Do something for the actual residents of the state that voted for this already.</p>
<p>Paul Lim</p>	<p>7/7/21</p>	<p>Is this meeting in person or online only? can i attend? I would like to speak about growing opportunity for minorities?</p>
<p>Eric Jiang</p>	<p>7/7/21</p>	<p>We should advertise more for the CRC, not commercially but rather informatively. We attended our Town Hall last month and the council had no idea a CRC was even formed yet. Because they're uninformed, they decided to prohibit all cannabis licenses which caused other towns to follow suit. We're trying our best to inform the towns and to promote attendance for these CRC meetings. I believe an informative e-mail updating each town council will sway them to work with the CRC. More town councils being informed, means better regulations, more licensing opportunities, and a bigger successful program.</p>

Susan
Sciarretto

7/11/21

We're literally living in the best of times AND the worst of times, which means utter chaos. Our citizens overwhelmingly voted in favor of legalization, including almost 2/3 of my town of Clementon. I have to try to convince the council of the benefits of opting in to allow cannabis businesses in my town when ALL OF US are patiently awaiting ANY crumbs to come out from this office. It makes me feel very irresponsible as a potential small business owner to do that because I am unprepared to give them anything other than successful examples from other states.

I, myself, have little to go on to create a comprehensive business plan except such examples. Everyone is in limbo flying blind so some guidance would be greatly appreciated to cut through the conjecture. For example, the only actual number I have seen is on a blog from 4/14 stating ALL applications require a \$20K fee in the form of 2 checks for \$2K and \$18K subsequently. If the application is rejected, all but \$2K will be returned. Is this true and will there be a grace period to allow applicants to make appropriate corrections? I need this information to build into my loan application and I can't afford to guess.

Regarding labeling and packaging, I won't speak for anyone but myself but I have ABSOLUTELY NO INTENTION of marketing to children, even though my delivery system is designed specifically for medical patients of all ages. I have been to other state's dispensaries and seen brands with a smiling pot leaf smoking a joint that could go either way. I certainly don't want my application rejected because of artwork that can be changed or eliminated. Will you allow or deny licenses contingent on artwork?

Lastly but just as important is the irresponsible stance of NJ legislators that are against home cultivation for medical patients. All I keep hearing from the loudest opponents is how they went to Colorado when the state incorrectly allowed patients to cultivate up to 99 plants per person. Obviously to everyone BUT them, that was an obscene number that Colorado has since changed. That's the big word that's missing here: CHANGE!

We don't elect our officials to seek out the worst case scenarios and throw up their hands because someone else failed. I would have hoped our representatives would have looked at that scenario and said, " BUT we can do better!!" How many states have successful home grow programs that we're simply not emulating? Can we please CHANGE the collective thinking from why it can't work to how can we make it happen?

I recently experienced the frustration of Jeff Oakes while in the hospital, given incredibly dangerous opioids and not allowed my medication that actually works. Jeff's Law should already be a part of the Compassionate Care Act. I want to get off these opioids. The governor says the state cares about this crisis. How? I need home cultivation to safely and painlessly end my dependence my way, the best way. I implore you to be the voices of reason and sanity on this issue.

Thank you for your time.

Brian C
Cooper
Ph.D.

7/12/21

Dear Commissioners,

We, the partners of Ganj-A GoGo Incorporated, wish to enthusiastically extend our thanks to you and your staff members for the work and time you have devoted, as well as the commitment and dedication you have demonstrated as you work to create the regulatory framework which is to govern New Jersey's new cannabis market. We appreciate the opportunity to add our voices to the discussion as you deliberate on the best approaches to regulate New Jersey's future cannabis market.

Ganj-A GoGo Incorporated is a primarily Black-owned (90% Black-ownership) fledging company, newly created to take advantage of the emerging business opportunity presented by New Jersey's groundbreaking cannabis legislation which was overwhelmingly approved by New Jerseyans. It became apparent to us that Governor Murphy was serious about his commitment to ensure New Jersey's cannabis landscape would be fair and equitable when we saw the composition of the CRC itself. With a very racially diverse Commission comprised of an equal number of men and women, from our vantage, this multiplicity of perspectives gave us hope that the state was committed to diverse representation amongst cannabis business operators in New Jersey. We have been following, the members of the Commission, in print news, conference appearances, and recorded interviews in attempts to understand your individual perspectives. We were delighted to hear the members of the Commission are committed to an equitable distribution of cultivation, processing, and dispensary licenses throughout the geographic subdivisions of the state, as well as your unwavering commitment to seeing that this new regulatory environment does not exclude those traditionally locked out of such opportunities. We would like to echo the sentiments made in statements by those in your membership that stress the importance of establishing licensing fees, bonds, and application fees which do not unfairly depress participation of Peoples of Color and other marginalized groups as we seek entry into this new business landscape. We are also in agreement with the Commission, that NOW is the time to help rebuild targeted communities with substantive regulatory measures which would help to stimulate minority economic development, create more and better-paying jobs in Our communities, and eventually, create pathways to wealth generation for the constituent members of these communities; communities long impacted by this country's unequally enforced "War on Drugs".

We know that only 17 licenses are to be awarded in the first round. Though the specifics about what type of licenses these will be are not yet clear to us. We would like to state that it is our hope you would consider making these first 17 licenses fully vertical with a single application fee. A vertical license would allow our company, and any others lucky enough to garner one, to implement a "Seed to Sale" model. As a new Black-owned company, our access to start-up capital is limited. The business plan we have devised is financially sound, but it is contingent on this model. We are also aware that large cash-flush organizations will be in competition with us to garner these licenses. It is our hope you consider that we, and those like us, are at a severe disadvantage when competing against such companies, and if we are to be a force for positive change in Our communities, Our businesses must be able to compete with these larger companies in order to prosper.

We felt very strongly that our input was necessary to make the Commissioners aware of our thoughts, opinions, and position regarding an equitable playing field as related to the awarding of licenses. Accordingly, we wish to maintain active contact with the Commission to engage the process to inform you about issues important to our group, especially those surrounding the topics of access and fairness. Again, thank you for the time and consideration.

Brian C. Cooper, Ph.D. - CEO Ganj-A GoGo Inc

Councilwo
man
Danielle M.
Jones

7/12/21

There are some questions raised by a fellow Council member & the Borough CFO that they wanted to be shared with the Commission:

Councilwoman Maria Grazia Escalante:

- Can the ordinance include a time limit for a dispensary to split into medical & adult-use cannabis sales?
- What is the maximum municipal tax for distribution (Class #4) and delivery (Class #6), if any?
- Can an individual grow adult-use cannabis at a municipal community garden?

CFO Dena Amodea

- What documents will be submitted to ensure the municipality is receiving the proper percentage based on receipt of sales?
- Where will documents be sent and who will be calculating the percentage owed to the municipality (committee, etc.)?
- In packet, it states it will be treated as a delinquent tax? If treated as delinquent tax, will all delinquents taxes go to tax sale, and what is the process for cannabis?

Please feel free to contact me via email or phone with any questions.

Lauren J.
Chang
Thompson

7/12/21

Dear Chairwoman Houenou:

We thank you again for the opportunity to submit our thoughts regarding the important topics brought forth by the Cannabis Regulatory Commission (CRC) today. As professionals in regulated fields, hopeful micro cannabis dispensary owners, and experienced medical patients in the New Jersey Medical Marijuana Program, we are confident our perspective will be of value to your deliberations. After much discussion we have developed our comments and provided them below. We hope that the CRC can benefit from them.

Responses

(1) Packaging & Labeling

Packaging:

As it stands today the cannabis industry is unfortunately rife with environmental offenses, and packaging waste is a major culprit. The CRC has received a clear mandate via CREAMMA that packaging be “opaque” and “child resistant” which is in line with other state cannabis industries. If the CRC is not mindful to ensure that environmental impact is provided equal consideration in the establishment of packaging regulations, New Jersey’s cannabis industry will experience the same needless waste that others have seen. We agree secure packaging is required to ensure that children do not accidentally consume cannabis products, and we agree that airtight packaging is necessary to ensure the longevity of the product, but there must be a balance with these serious environmental concerns.

In light of this issue, we encourage the CRC to establish regulations that put equal consideration towards the environmental impact that cannabis packaging can have. For example, the CRC can establish regulations that (i) allow for incentivized recycling programs which involve all levels of cannabis stakeholders from producers to retailers to consumers and everyone in between, (ii) allow for multi-use containers as opposed to single-use packaging where feasible, (iii) provide financial or other incentives for cannabis establishments that maintain certain environmental standards with respect to packaging, and (iv) provide financial or other incentives for packaging producers that create innovative and environmentally-friendly packaging solutions.

In addition, we also encourage the CRC to adopt regulations concerning packaging ease-of-use standards with the State’s most vulnerable consumers in mind, including at minimum clear package opening instructions. It is our personal experience that the security measures created by some packaging manufacturers in other states have led to packaging that can be difficult to open and are not often accompanied by instructions (anecdotally we have found this is particularly true for concentrate packaging). As we -

well-educated, able-bodied adults - struggled to open this packaging, we could not help but think of elderly or disabled consumers who would face a dire struggle with the same product. We ask the CRC to consider this important issue.

Labeling:

While the labeling requirements mandated in CREAMMA are prescriptive and comprehensive, we ask that the CRC not restrict cannabis retailers from adding additional labeling as they see fit. This additional labeling can be used, for example, to highlight additional product features such as identifying a product as from a minority-owned business, a producer's environmental impact rating, labels for any additional quality assurance testing, and far more. This additional labeling would of course be subject to the labeling and advertising restrictions that already exist in CREAMMA and other state and federal laws, in addition to any relevant regulations from the CRC.

(2) Advertising

CREAMMA prescribed many of the advertising rules expected from the CRC, however we believe there is ambiguity that exists in the statute as written. We encourage the CRC to develop advertising regulations that are as clear as possible, and we further implore the CRC to focus its rules on describing which activities are prohibited rather than which are allowed. Given that advertising in the cannabis industry is n

Justin
Escher
Alpert

7/13/21

Dear New Jersey CRC:

Let's encourage responsible innovation through the micro-licenses.

Keep a close eye on how the multi-state operators use product branding to bleed the State dry through intellectual property licensing.

Almost nine months since folks voted to legalize. The CRC seems caught up in its own red tape. Have not done the work to convince localities that the regulations will respect their autonomy. The slush fund to the Impact Zones is set to go corrupt from the word Go. Drive around and see signs that folks are already responsibly exercising the economic liberty. The CRC is rapidly becoming over-extended on its authority.

Get the Micro-licenses out quickly to any free citizen who wants one. Require them to bank locally and support real living wages. Start publicly advocating for a Safe Harbor for Personal Cultivation. Develop economic supports for healthy local culture and commerce and a broad sense of Liberty and Prosperity.

How may I help?

Very truly yours,

Justin Escher Alpert

Henry
Silcock

7/13/21

CYBERSECURITY CANNABIS & SOCIAL EQUITY
Summary of remarks planned for 13 July NJ CRC meeting

SPECIAL CIRCUMSTANCES

- Cannabis is a high-value target
- Complex regulatory reporting requirements – track & trace
- Available support software is complex and unstable
- many vendors and variants, system integration challenging
- recent breaches in CO and CA
- Many new small business participants – micro-licensees

CAN'T SEPARATE...

- Physical security – now emphasized in license applications
- Cybersecurity
- Business continuity
- Ransomware prevention and recovery

RECOMMEND

- Basic cybersecurity standards for all licensees
- per NJ CCIC recommendations
- Include cybersecurity in license evaluation criteria
- Use a secure and robust track & trace system (and networks)
- Plan for migration to “zero-trust” cybersecurity
- Plan for federal legalization and regulation

SUPPORT FOR SOCIAL EQUITY

- Cybersecurity for micro-licensees
- Employee training – policies and procedures
- IT & OT configuration – reference implementations
- Business continuity & ransomware protection for micro-licensees
- Cannabis ISAO (Information Sharing & Analysis Organization)

Grisel Barry 7/12/21

Dear Chairwoman Houenou and members of the Commission,

My name is Grisel Barry. I moved to the US from Puerto Rico as a child and I'm a long time NJ resident. Prior to my retirement from Hudson County Legal Services, I worked 35 years advocating for the underserved in Hudson County and, since my retirement, I've actively volunteered in various capacities. As a Multiple Sclerosis patient, I'm passionate about the cannabis plant, excited about the opportunity to apply my own experience and skills to participate in NJ's cannabis industry, and to bring jobs and relief to my community.

I'm proud of NJ for providing opportunities for small, local operators, and for minorities and women like me. I'm committed to pursuing a micro-cultivation license and have invested resources in understanding the operational ins/outs of running a cultivation business to best prepare for success.

It's clear that the intent of the micro license category is to remove barriers for those less capitalized and less experienced. However, certain aspects of the statute have made it difficult for me to estimate costs and identify a facility. I urge the Commission to not unintentionally limit a microbusiness' ability to be competitive, compliant, and operationally effective through overly restrictive operational limitations. Please consider codifying the following interpretations of the statute when defining regulations for microbusinesses and micro-cultivators.

(i) Employ no more than 10 employees;

Due to the highly-regulated nature of the cannabis industry and the safety and security that must be maintained at all times, an operator must manage many functions outside its primary operations of cultivating, manufacturing, or retailing. These functions include security, compliance, HR, environmental health/safety, inventory, sales etc. By limiting the total number of employees to "no more than 10," an operation risks choosing between critical operational resources and the admin/sales resources needed to stay competitive and maintain high standards.

Further, when an objective of the microbusiness is to create jobs within a host community, it seems counterproductive to limit a business's ability to add jobs as it grows. By limiting employment, the Commission is effectively requiring microbusinesses to

outsource functions such as compliance/security/safety to expensive contractors.

Please consider clarifying that the 10 employee limit applies to the number of employees in the building at a time, and excludes employees not supporting the primary operational activities of the establishment (i.e cultivation.) This will meet the goal of limiting the size/capacity without sacrificing the ability to remain compliant, safe, and competitive.

(ii) Operate a cannabis establishment occupying an area of no more than 2,500 square feet, and in the case of a cannabis cultivator, grow cannabis on an area no more than 2,500 square feet measured on a horizontal plane and grow above that plane not higher than 24 feet;

Please make clear that a cultivator may occupy more than a 2,500 sf facility, but is limited to 2,500 sf of growing space measured on a horizontal plan, as the statute indicates. If per the statute, a cultivator is allowed to occupy up to 2,500 sf on a horizontal plane of growing space, they must be allowed to occupy more square footage in order to handle critical operational functions such as propagation, trimming, curing, packaging, secure storage, etc.

Please also consider clarifying that “growing space” means “canopy” and define canopy as the surface area used to grow mature or flowering cannabis plants. This is consistent with industry norms and will allow micro-cultivators to maintain a consistent supply of cannabis and compete with larger industry players. Similarly, it would be logical to interpret that the 1000 plant limit would apply to flowering, usable plants.

Thank you for your consideration.

Sincerely,
Grisel Barry
Founder, Siembra, LLC

Sarah
Ahrens

7/13/21

Regarding: Packaging and labeling of cannabis & cannabis products

Both as a mother of 2 young girls and as an individual consumer, I want to know what is in the products I buy for my family and myself to consume. I read ingredient labels at the grocery store, I avoid products that have what I believe are unhealthy ingredients, I buy organic as much as possible. A cannabis consumer is no different than any other agricultural consumer: we have a right to know what is in what we consume. This transparency is crucial to gain consumer trust and ensure consumer safety. The testing that all legal cannabis products go through provides this transparency and ensures safety. All consumers should be able to see these testing results on every package of cannabis product. Typically, the COA (testing Certificate of Analysis) can be accessed through a

		QR code on the package. Consumers should not have to ask dispensaries for a COA. Can you imagine having to ask a grocery store employee what ingredients are in the package of frozen fish or box of cereal you are looking at? The COA for each and every cannabis product needs to be easily accessible to consumers, and the best/easiest way to provide this transparency is to have the QR code on the package, which directly links to the product- and batch-specific COA. The safety of legal cannabis is what sets it apart from illegal cannabis. Let us ensure consumers can easily see how safe the legal cannabis products really are.
Scott Pollack	7/13/21	I have been closely following the work of the CRC since its inception a few months ago. While I applaud your service and efforts, I am perplexed as to why the state has failed to move on issuing more medical marijuana permits with adult-use sales right around the corner. I understand that there are just a handful of permits in the state, but the number of registered medical marijuana permits is growing daily. Why is the state failing to keep pace to serve these patients. I imagine they'll face even longer wait times and access challenges when adult use sales come online and demand skyrockets. First course of action for the CRC should be meeting current demand and building out from there and this requires more permits now.
James E Harrington	7/13/21	I suffer from a condition that would benefit from medical marijuana, but I've failed to get a card because I understand the hassle and cost just aren't worth it. Patients that I know pay steep costs to get the medical marijuana that they need...and those are the ones that can even access it! Far too many patients can't even get it because there are not enough dispensaries conveniently located to meet the need. The CRC should prioritize patients and strengthen the medical market by issuing more permits. Otherwise these patients may face even greater hurdles when adult use sales start next year. Medical marijuana permits should be agenda item number one!
Daniel Cleary	7/13/21	Can a micro grow package its own goods ,brand and deliver to dispensaries? If no why not? In the bill it says 2500 sq. ft. is that canopy or total build and 24 ft. in Hight as in on racks or vertical walls? thank you!
Thomas Coogan	7/13/21	A study on the variance between samples from a single lot tested by NJ PHEL demonstrates remarkable natural variation within batches. Given the range of potencies found within single lots, the most informative label for THC levels would reflect that range, such as "15-17%" rather than giving a false sense of precision with a labeling like "16.27%". A manuscript on the natural variation can be shared with the CRC.

Robert Rome

7/13/21

I am writing to discuss cannabis product labeling and how my home state of New Jersey can take an active role in defining best practices for our nascent industry.

I have over two decades of experience working locally here in NJ within the pharmaceutical sector and have had various roles and functions within the industry managing and overseeing various aspects of the QA / QC process.

There is resounding evidence that when cannabis products are introduced into a market there is an increase in the number of medical expenses caused by new users and experimental consumption - for every dollar spent supporting a hotline, almost \$14 are saved in medical costs. According to data collected from the National Poison Data System, 28,630 people called Poison Control between January 2017 and December 2019 and equally as notable, is the quarterly increase in number of calls which grew from 2,000 to 2,500 over the same period of time. Additionally, higher rates in legal states suggest that continued increases may be expected with adult cannabis use legalization in more states.

The issue in a state choosing to negate these documented safety issues with the use of the Poison Control Hotline, is that this is a retroactive process and only has the ability to prevent an already negative situation from becoming worse; it does not have the ability to prevent an issue altogether.

It is for this reason that I implore my home state of New Jersey to take a more proactive approach. We must build and categorize the data necessary to make for a safer cannabis industry.

While lovastatin was first approved by the FDA in 1987, it was not until a somewhat accidental discovery in 1989 that we learned grapefruit had an adverse reaction profile with the drug. Today, it is commonly known that if you are on a 'statin drug product you should avoid grapefruit. No different than this, as cannabis becomes mainstream we will begin to discover how it interacts with other medications people may be taking.

Patients who regularly use cannabis may require more than two times the usual level of sedation when undergoing medical procedures, according to a study published in The Journal of the American Osteopathic Association. This study noted that 220% more propofol was required to achieve optimum sedation for routine procedures such as a colonoscopy.

We must take a proactive approach and I want to briefly note how important it is that New Jersey address the void within the current industry by taking an active pharmacovigilance approach and discuss the ways in which the CRC can lead as a state agency looking ahead at a mature industry.

I believe that the CRC should bring cannabis companies to future compliance with 21 CFR 310 & 314 which will almost certainly be required should the FDA later start to govern a federally legal cannabis.

By setting reporting standards that must appear on all cannabis packaging, and providing for industry to report into a centralized database, the CRC will have the opportunity to show the world how New Jersey has taken a proactive approach. We have the opportunity to set the standards for cannabis data repositories.

My name is Robert Rome, I am a current NJ resident and medical patient; I grew up in Bergen County and am now raising my own children here. I am a small business owner and look to grow within this industry and my company the Canna Call Corporation has created a Post-Marketing Safety Surveillance Program specifically for cannabis by adopting standards from the pharmaceutical industry, and modeling its system after the FDA's MedWatch program.

We need to study how cannabis interacts with other products and especially drugs. Gathering accurate data is our responsibility and pharmacovigilance can save lives! A proper program should address ADR's (Adverse Drug Reactions), PQC's (Product Quality Complaints) to address recalls and be available as a MICC (Medical Information Call Center) for a proactive approach to pa

Brian C. Cooper, Ph.D.

7/13/21

Thank you to all of the Commissioners for the opportunity to weigh in on the issue concerning packaging and labelling for cannabis related products in the state. The comments/concerns stated by your distinguished panel of invited speakers has given our organization food for thought. However, there is one thing we would like the Commission to consider, sustainability. We would like the Commission to consider the allowance of paper packaging, as the use of child proofed plastic packages adds to the issues associated with our societies reliance on plastics and help exacerbate the ills associated with the over-production of plastics which needlessly end up in landfills. There are large-volume child-safe resealable plastic bags on the market and already in use in several states where cannabis products are already available. We propose that the Commission consider adopting regulations which require all cannabis products purchased at dispensaries to be sealed in these resealable child-safe bags before handoff to consumers. That would accomplish the goal keeping the product out of the hands of children, while still allowing cannabis product producers to use paper packaging, which can reduce cost to the producers while simultaneously reducing the reliance on plastic products. Thank you for you time and consideration!

Nicholas
Cody

7/13/21

As requested by Commissioner Barker, I am happy to submit the following comments;

1. Section C.24:6I-36 – Subsection F2B pg 63 of the statute defining a Micro Business states that at least 51% of the owners, directors, officers, OR employees shall reside in the municipality in which the center is located. The word OR would suggest that the owners and directors of the company may live anywhere in the state, so long as the aggregate of all those involved is at least 51% local. Given the highly specialized nature of what a cultivation center does, we strongly encourage the rules and regs to exempt all owners from this requirement. It will be extremely difficult, given the nature and requirements of the site, to find one in or near the town in which I live.
2. As defined, a Cultivation Facility under a micro license is limited to 2,500 sf of space on which cannabis plant grow. We strongly recommended that NJ follow suit of other states with similar legislation and include only mature flowering plants within this 2,500 sf limitation. This would leave enough space elsewhere in the building for cloning, mothering, vegging and R&D space.
3. Since April cannabis prides itself on producing only top quality, responsibly and sustainably grown flowers, it is imperative that a Craft Growing operations such as Arpil Cannabis be able to keep control of its product and brand. To that end, the entire April Cannabis team strongly recommends that the rules allow Cultivators to package their own product, produce their own pre rolls and extracts, and to be able to sell fully branded packaged product directly to the dispensaries.
4. Does the commission intend to stipulate a time limit, following approval of licensure, for a cannabis cultivation facility to be operational? A facility such as the one we have planned requires significant planning, design and construction, and immediate or quick move into operations will be difficult or impossible to accomplish. Such a rule would decrease the quality of cultivation facilities across the state.
5. Will cultivation centers be permitted to sell clones to other cultivation centers and dispensaries? This is a critical aspect of the industry and a reliable income potential for Craft cultivators such as April Cannabis.
6. The 1,000 plant per month limit is ambiguous. A cultivation center does not operate on a month to month cycle and further clarification is required. April Cannabis suggests this limitation apply to flowing plants only, as at times, it is very necessary to have many more plants in clone and vegetative states in order to allow for losses due to failures, pests, etc..

Kevin K
O'Leary

7/13/21

Public Comment Harmony
Good afternoon commissioners –

I am the Deputy Mayor of Lafayette but have also been involved in the process of granting Harmony Foundation local approvals- I have been involved with Harmony since they first approached Lafayette with a concept to grow medicinal cannabis. I also authored our cannabis “opt out” ordinance-- which actually “opts in” on the Category 1 through 4 licenses in our Light Industrial zone. I also just introduced the Lafayette second ordinance to establish the local tax on product grown and processed at this site. I mention this to make the point that locally everything that needs to be done to start development of this site is completed.

I should mention that the selection of this site predates the recent recreational use referendum approval. The concept began as a medicinal cannabis grow site. The Township Committee and the Land Use Board recognized during the process the likelihood the referendum would pass and all approvals allow for cultivation of recreational cannabis as well as medicinal-- in the event the Commission’s regulations continue to make any distinction.

I also should mention Harmony was one of the most professional entities to appear before the LUB in my 17 -year tenure on this board-

I hope you all have the letter that the TC submitted on July 6 supporting this operation- I just want to raise a couple of points in this public session-

First -Harmony has been developing this concept to operate a large facility in Lafayette dating back to 2019- They are one of the first medicinal cannabis licensees in the State and are probably way ahead of the curve as far as identifying what needs to be done to start operations.

#2 Lafayette resident’s public opinion

There were two early meetings during the Use Variance phase of the application where significant public was present expressing concerns. But by the time the presentations were over-- public concern waned because Harmony put on such a strong case and they were able to address the issues raised with traffic, security and fire prevention, lighting, odor and noise issues, fencing and virtually all other elements that are part of any development process. In short, the presentation showed the public and ultimately the local officials that Harmony was a very responsible and professional organization. At the final meeting, there was little public comment opposing the application.

#3 Site location- This property at 144 Rt 94 is ideal for a large-scale cannabis facility-

It is located on State highway 94 on a large 100 plus acre tract-

It is only 3 miles from the Augusta State Police barracks. Harmony has met with them and the Fire Department to address emergency management concerns.

It is a low-profile location due to existing mature evergreens shielding the operation from traveling public along Rt. 94. The rest of the property is surrounded on all sides by an existing wooded buffer.

History of the lot is that it was a research and development site for Schering Plough pharmaceutical company that was eventually bought by Merck and closed as they had their own more modern R&D facility – it used to be the largest ratable in Lafayette- This Site is in real need of redevelopment.

Lafayette recently approved a concept plan to build about 140 apartments in town that could house new employees and 28 of the units will be COAH.

In closing, I understand members of the agency will be coming to Lafayette to visit the site and the TC welcomes you and perhaps can be present to answer any questions you might have during that visit.

Lafayette is looking forward to a continuing partnership with Harmony. It has been a pleasure to deal with them thus far as they have been transparent and professional and hopefully this operation will bring hundreds of jobs to our town.

I welcome any specific questions you might have now.

Jaclyn Perez 7/13/21

My question is in regards to the dosing information on edibles. As we recognize the importance of potency in the labeling of edibles, is there any plan for the CRC to address the considerable number of people currently incarcerated for felony possession because their edibles were weighed by law enforcement based on the gross weight of the product rather than potency? This question is of considerable importance to me because my husband and the father of our three children, with no prior criminal record, was incarcerated with violent criminals because he was arrested with edibles in his possession. Current law enforcement procedure is to weigh the total weight of the edible rather than the THC content. For example, a brownie weighing 1 pound may only contain 250mg of total THC content (<1%) but would be charged as 1lb. My husband was charged with a 1st degree felony having a TOTAL WEIGHT of just over 5 pounds of edible THC, or 75 individual pieces of candy packaged separately. If the same scenario were to occur today, assuming procedures on weighing edibles will change, that amount of THC would be a recreationally legal amount today and yet my husband is currently sitting in jail. How do we rectify this inequity within our state?

<p>Mark Dingelstedt</p>	<p>7/13/21</p>	<p>Good Evening Ladies and Gentleman of the Cannabis Regulatory Commission. Thank you for this opportunity to speak this evening.</p> <p>My name is Mark Dingelstedt. I am a sixty year old family man..I have been a medical marijuana patient since June of 2018. At the time I was taking two Opioid pain pills and 8 other medications . Three years later my only Medication is cannabis. To say that Cannabis has given me my life back is an understatement.</p> <p>I am doing well but it hasn't always been easy.One of the things that I used to do before picking up some flower was to view the terpene profiles listed on the ATC websites. A terpene is a element of the cannabis plant that comes from same glands that produce cannabinoids like THC and CBD,</p> <p>Terpenes are aromatic oils that give cannabis strains distinctive flavors like citrus, berry, mint, and pine. They are also know for the entourage effect. When interacting with other cannabinoids they can provide benefits like relaxation and stress relief and others might provide a more uplifting and energetic effect.</p> <p>By viewing a strain profile a Patient has a better idea of what effects a particular strain might have. The problem is that the ATCs no longer publish terpene profiles and this makes choosing the right strain difficult. When asked about the missing profiles, the ATCs simply say its the States rules.</p> <p>Strains are often unavailable, discontinued or in limited quantities. If my go to strain is out of stock, I have to choose another strain and maybe another dispensary. There is no info out there for patients to make a informed decision on our meds.</p> <p>Verano’s East Coast Sour Diesel Strain is available in most of the dispensaries in the state. I checked about an hour ago and here is a sampling of how this strain is described.</p> <p>“East Coast Sour Diesel (or ECSD) is an active and motivating, deceptively potent (THC levels reportedly reaching 20%), not-ideal-for- beginners”</p> <p>“East Coast Sour Diesel cannabis strain, sometimes known simply as “ECSD,” is a 70/30 sativa with a relatively moderate THC level..”</p> <p>So which is it? A moderate or potent strain?</p>
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Another site simply offer Genetics Sour Diesel x RFK Skunk x Hawaiian Northern Lights.

How is this info helpful?

More importantly, How come the information is not the same across all ATCs?

I could go to the State Strain Library for strain specific information however strain library is hard to use and offers little value.

The only info that may be helpful to patients are the Eight (8) cannabinoids (THC, THCA, Delta 8 THC, CBD, CBDA, GBG, CBGA, CBN) that are listed in these reports.

No terpenes are listed.

In order to access these reports you have to leave the ATC web site and log in to the state website, click thru to the strain library ,click on a dispensary and then find the strain we are interested in. The problem is that strains are often not listed by strain name, rather by identifiers like CCF- CBDSS or CS818h.This only confuses the issue.

Another problem is the Strain Library is not up to date.

I bought a strain on Last week. The report on this strain had not been updated in 10 months. since October 2020..How can I rely on the Strain Library as a reliable source of information?

I feel that patients should not have to jump thru hoops to find out what is in their medicine..

We run the risk of choosing the wrong strain. There is nothing worse than trying a new strain and it doesn't relieve the symptoms.

Given the right information, patients will be able to make a more educated decision regarding their medications

I agree with Dr. Nathan when he says that terpene profiles should be put on cannabis packaging however we also need this information before we make a purchase.

I encourage the CRC to allow the terpene profiles to be published and to bring the Strain Library up to date with a easy to read format with both Cannabinoids and terpenes.

Thank you for considering my thoughts

I welcome any questions or comments

Camillion
Simms

7/13/21

Esteemed members of the CRC, business owners, and advocates.

My name is Camillion Simms, founder and owner of Secret Gardens Shoppe LLC. A potential micro cannabis retail.

We are at a unique juncture in history.

In my short lifetime, I've lived through the 80's drug epidemic, the subsequent war on it, and the rise of the prison industrial complex.

And now, in 2021, we are asking CANNABIS to save us.

To save our local and state economies from increasing tax burdens.

To ease the suffering of those who experience debilitating chronic pain and terminal diagnoses.

To help the poor, but enterprising;

the marginalized, but hopeful;

the maligned, but working to be redeemed -- to hedge their bets for economic justice.

We are in a race to be prioritized against corporations, who buy political influence, and crowd out small businesses with high quantity and low quality.

We want to be the ones this commission turns to when regulations need crafting.

To be centered when conversations turn to the allocation of funds for brick and mortar shops or e-commerce.

To be extended, in good faith, all the resources to ensure small business owners are easily in compliance without inflated fees or drawn out processes.

We are here to ensure the CRC is accountable to the principles of equity outlined in writing past parliamentarian language.

We want to see success embodied in owners who are disabled; single-parenting; nonbinary; queer; who have leveraged income tax returns and benevolent friends and family for money to fund their entrepreneurial spirits.

In short, this is our chance to undo the mistakes of unchecked monopolies and discriminatory, gatekeeping policies.

We thank you for identifying the need for small businesses to receive additional supports for success; and look forward to creating a model with the Commission that builds on community, not status.

I stand not only as a minority, not only as a disabled veteran, but as someone who is currently battling stage 3 colon cancer and enduring 50 hours of chemotherapy every other week. I am a medical cannabis patient. I don't make six figures, and am on a fixed income. I stress the needed support for those alike, and I look forward to seeing all of our aspiring small business owners win.

thank you for your time. I pre-registered to speak and was not called.

Gabriella Wilday

7/13/21

Thank you in advance for taking the time to read my note. I'm a Mom of three teens and for various reasons I am a proponent of legalization. I ran out of space so look for next submission, sorry!

In my opinion, while the statutes around MicroBusiness ("MB") and Social Equity licensing have good intentions, not only do they underestimate and undervalue their respective licensees, they impede their ability to succeed. These statutes also limit the ability of MB's to give back and impact communities in a meaningful way.

As you continue to work through NJ cannabis regulations, please consider the following points:

EMPLOYMENT OPPORTUNITIES

As a condition for licensing prioritization under Social Equity, if majority ownership doesn't reside in an impact zone, 25% of employees must. For an MB who's limited to employing a maximum of 10 people, this requirement amounts to a mere 2.5 jobs. 2.5 is not enough - these communities need more than 2.5 jobs. Municipalities recognize this need and will likely approve operators based on the number of jobs they'll create. General licensees with no headcount limitation have the ability to create more jobs than MB's and therefore, will be much more attractive operators to municipalities. MB's will be at a disadvantage.

LOCAL TRANSFER TAX

The restrictions on MB's of a maximum 2,500 sq ft of operating space (all class types), a maximum cultivation canopy of 2,500 sq ft and 1,000 plants per month significantly limits sales potential. General licensees have no square footage or plant quantity limitations and therefore have unlimited sales potential. Municipalities will be more likely to approve general licensees to operate within their jurisdictions vs. MB's because sales volume directly impacts the amount of local transfer tax revenue they'll receive. More sales revenue means more tax dollars to the municipality and that leaves MB's at a significant disadvantage over general licensees.

SQUARE FOOTAGE IMPLICATIONS ON CULTIVATION

All MB license types are restricted to a maximum operating space of 2,500 square feet.

There are various phases that take place during the cultivation of cannabis and each requires distinct procedures and conditions which are critical to the outcome.

Phase 1 - vegetation phase which can take as long as 21 days and requires specific lighting, temperature control, pest control and filtered water for hydration. Vegetation requires a dedicated space/room.

Phase 2 - flower stage which takes approximately 10 weeks and requires a dedicated space/room, timed lighting, temperature control, pest control and filtered water for hydration all of which are distinctly different from the requirements needed during phase 1.

Phase 3 - drying phase which can take up to 2 weeks and requires a dedicated space/room, temperature control and pest control with conditions distinctly different from phase 1 and 2 requirements.

So from a square footage perspective, for cultivation a MB needs to squeeze the following into 2,500 sq ft:

- Veg Room with tables, grow lights, duct work for HVAC climate control, reverse osmosis water hoses for hydration, security cameras
- Flower Room with tables, grow lights, duct work for HVAC climate control, reverse osmosis water hoses for hydration, security cameras
- Dry Room with super high ceilings to hang plants, duct work for HVAC climate control and security cameras.
- Restrooms
- Security surveillance room
- Utility Room
- Breakroom

The size constraint of 2,500 sq feet will make it virtually impossible for a cultivation MB to sustain operations. Think of the AMP requirements alone. Economies of scale benefit large cultivators as the incremental infrastructure and start-up capital expenses decrease as square footage increases. Also, MB will need to sell to a distributor at a significant discount over large cultivators that can guarantee much higher volume.

**** second email to follow**** Thanks!

Kevin McKernan

7/14/21

Thank you for hearing our comments,
I am Kevin McKernan, CSO of Medicinal Genomics.

I have 26 years of experience in Genomics and Microbiology. I managed the R&D team for the Human Genome Project under Eric Lander's guidance at Whitehead/MIT Center for Genome Research. Dr. Lander is currently President Biden Scientific Cabinet member. I have in over 42K citations in the genomics field (https://scholar.google.com/citations?user=WKED1_sAAAAJ&hl=en).

I am one of the most highly cited scientists in the cannabis microbiome field.

<https://f1000research.com/articles/4-1422>

<https://f1000research.com/articles/5-2471>

https://www.researchgate.net/publication/318020615_Contaminants_of_Concern_in_Cannabis_Microbes_Heavy_Metals_and_Pesticides

<https://osf.io/vpxe5/>

<https://zenodo.org/record/4759883#.YO5iiZNKiJs>

<https://www.biorxiv.org/content/10.1101/2020.01.03.894428v1.full.pdf>

We (Medicinal Genomics) provide microbial detection tools to over 150 labs across the world and have been doing this longer than any company in the world (since 2015).

We have experience that we believe the State of New Jersey can learn from to avoid the pitfalls of other states crafting regulations for this field.

We believe the technology choices for laboratories should be left to market competition to sort out. Regulating one technology choice over another has led to many problems in other states.

As an example, the State of Maryland recently mandated the use of Plating for microbial detection despite the largest Cannabis market in the world (California) adopting more modern molecular methods.

There are several problem with the 100 year old plating technology when applied to cannabis.

1)Plating cannot detect the risks documented in the clinical literature for cannabis. The majority of the deaths in the clinical literature for cannabis are Aspergillus infection deaths or Aspergillosis. MD has implement clinically meaningless testing known as Total E.coli (non-pathogenic), Total Aerobic Count (TAC) and Total Yeast and Mold (TYM) testing. These tests are non-

informative to clinicians as they fail to detect the risks known to exist in Cannabis and detect many harmless microbes ubiquitous to cannabis flowers and the human microbiome. California abandoned these tests for more specific molecular tests that look for shiga-toxin producing E. coli, Salmonella species, and the 4 pathogenic species of Aspergillus.

2)Plating fails to detect Endophytes. These are microbes that live inside of the plant. In order to survey endophytes, you need to lyse open plant cell walls and once this done properly, the cells are no longer viable and cannot grow on Petri dishes (plating). Aspergillus is a plant endophyte. You cannot detect all of the Aspergillus by simply surveying the Epiphytes (microbes on the surface of the plant).

3)Plating is highly variable and doesn't scale. This leads to lab to lab discordance, public false alarms over this lab to lab discordance, and much more regulatory friction as the press tends to exaggerate these lab disagreements. This creates false regulatory fire drills which often forces labs to change procedures, raising costs and destroying equity programs with a revolving door of new regulations by fire drill.

4)Plating requires the labs replicate human pathogens by culturing them. Culturing human pathogens is dangerous for the lab staff when non infectious routes to monitor pathogens DNA exist. Lab leaks happen and regulations that force pathogens to be brewed in cannabis testing labs are reckless when more sensitive alternative exist that don't have this requirement. This is reason COVID-19 testing all solidified on PCR testing as opposed to culturing virus on Vero cell plates.

Both the FDA and the CDC are sunsetting culture based testing as only 5% of microbes can be cultured but 100% of them have DNA that can be amplified. We highly encourage you to protect Patients in NJ with modern specific and testing.

Lincoln
Adam
Gratton

7/14/21

My name is Lincoln Adam Gratton I have been a medical patient for the last 3 years.i have only 1 gripe with the system. I was invited this past weekend to go with a friend to the Rise dispensary located in Paramus N.J. this is over an our away for us both as we live in Ocean County. I wasn't able to purchase my medication not due to a invalid medical card, it was due to my driver's license being invalid. We have had a pandemic this last year that severely crippled the MVC. This should not be the patients fault. I asked the security guard why I couldn't purchase and his response was and I quote. "Your license is invalid we cannot let you purchase since it is your first time here you need 2 forms of valid i.d." I ask that we find a simpler way for our patients to access their medication. When going to the store and purchasing alcohol I am required to show one valid form of i.d. this should be the same for cannabis. Next subject is social equity/justice. I am an African American male who has been affected by the war on drugs. I have extensive minor drug offenses on my record. I don't not have access to the 1 million in capital that is needed for a simple consumption lounge. I ask that there is a program or coalition to help people who do not have access to the capital needed to start their/my cannabis dreams. There shouldn't be a million dollar pay wall for the demographic of people who have been affected by the war on drugs. Aclu states minorities are 3 to 4 times likely to be arrested for cannabis. If you look at the current MSO in New Jersey

		<p>you will see that most of the ceos are white. The law has changed but who it benefits hasn't. This isn't social equity at all. The New Jersey market is poised to help a certain demographic of people and continue to hurt those who cannot afford to participate. My final subject I want to ask is about the impact zones. I will give you a history rundown from where I lived for most of my life but had to move due to my cannabis use and racial differences. My home county of monmouth was a kkk stomping ground back in the 30s. My father remembers seeing meetings in evans area located in my hometown of Wall as a child. This town was establishing in 1851 and has been a historical staple in New Jersey. Wall has a population of 25,000 citizens. Whites make up 90% of the town 3.3% of the town is African-American another 4% is Latino. If you look at the landscape of the town you will notice the African-American demographic is located on the outskirts of town in low-income housing. This needs to change. I would like for there to be a more comprehensive indication on impact zones because as being apart of that 3.3% of the African American population of the town you were 5.92 times more likely to be arrested for cannabis. Out of 25,000 people that is everyone located in the low-income section of Wall arrested more than 5 times a month for the same offense. I only ask that the Cannabis regulatory commission board look more closely at the history in some of the counties not allowing cannabis businesses. I hope I can participate within cannabis space and I look forward to being apart of an industry that I am very passionate about. I have a disabled brother and an elderly mother. She adopted me and took care of me for years. I want to have a smoke lounge to help provide services to our disabled/elderly community. My brother no longer lives at home as his care has been too much for my elderly mother to take care of. Our home town doesn't provide services need to tend for his care. I am not able to do so as I am financial unable to. I'm not doing this to make millions. I'm not doing this to build an empire. I just want to take care my family/community the way they did me.</p>
<p>Ravi Chandra</p>	<p>7/14/21</p>	<p>Dear Sir,</p> <p>I am totally new & as a minority was planning on to apply for a retail license in New Brunswick township. I need to know the detail steps on how to apply for the license both with the state & with the city . When will be the application deadline & where I could download the forms so at least I will get an idea what is involved both from business plan perspective and also financially & the time I would need to get all pieces of puzzle in the right direction.</p> <p>On another note the meeting yesterday was mind boggling & was impressed by the professionalism. The invited speakers were fantastic & thanks again & hopefully I will get an opportunity to give it a try at-least in applying for a retail license.</p> <p>Regards</p>
<p>Dishen Patel</p>	<p>7/14/21</p>	<p>Hi, my name is Dishen Patel, CEO and co-founder of NALA LUNA LLC, a minority-owned, experienced franchisor-backed franchisee. Coming from an immigrant family, I believe education is very important and having the support of experienced veterans in the industry helps. I wanted to see if the CRC had any interest in meeting (or having them as registered speakers for an upcoming CRC meeting) with the only cannabis dispensary franchisor in the country. I am part of a minority-owned franchisee of Unity Rd., looking to open a retail dispensary in Central Jersey. I think it may be worthwhile for the CRC to hear from the mgmt team (mainly</p>

MIKE WEINBERGER (<https://www.unityrd.com/about-cannabis-franchise>) at Unity rd. of the merits of a locally owned and operated franchise and how we have been focused on education and security for the safety of our community and consumers. Please let me know if any interest. I look forward to applying in the near future and appreciate all the great work you guys have been doing!

Debby
Miran

7/14/21

Good evening,

I know how hard it is to be a regulator and always wonder if you are getting it right. There are all kinds of “experts” out there with an endless supply of advice. But , there are also really smart people out there too who are truly subject matter experts who’s work is always subject to peer review. They are the ones that regulators should listen to very carefully.

Let’s face it, we all make mistakes from time to time, whether it is listening to the wrong advice, or just not listening at all. The measure of a great regulator is one who can admit mistaken decisions and correct them.

When I was on the Maryland commission, trying to create a new medical program that made sense, was workable for both the industry and the public, we made many mistakes. The great news was, there was always the commenting public to set us straight. When it came to setting up the testing program, I wanted to create a program that would mimic the FDA (or FDA light). We wanted Maryland to be the new standard, and for the most part, we succeeded. But, the science and technology doesn’t stand still, so regulations and guidances about testing will always be a work in progress.

We have been talking about total yeast and mold testing in cannabis flower for way too long. By “we” I mean everyone from the equipment manufacturers, the labs, the licensees, and of course the regulators. We need to put this test in some perspective. Most species of fungi are non-pathogenic to humans (other than those who are immunocompromised) and pose no health risk other than a quality appearance issue. On the other hand, there are very dangerous pathogenic species like some species of aspergillus that can cause severe illness or even death. Those species absolutely need to be tested for and conform to rigid specifications by the most accurate, precise, reproducible methodologies available. To quote a very brilliant scientist and expert, “ plating was the gold standard....50 years ago”.

I would like to strongly encourage the CRC and Commission, to take a good scientific look at the best way to assure products are safe and free from true pathogenic microorganisms and not worry too much about “a little moldy bread”.

For example, California has revised their microbiological testing requirements to only test specific human pathogens associated with cannabis use. Specifically, these are shiga toxin producing E. coli, and 4 species of salmonella (Aspergillus flavus, fumigatus, niger, and terreus). Preserving total yeast and mold testing and total aerobic count testing as a quality test for gross contamination is

reasonable. Other states are now considering these changes.
The Cannabis Advisory Group thank you for your time and consideration of these important testing issues so that we can create the best cannabis testing program in the US.

Jennifer
Cabrera

7/13/21

Dear Chairwoman Houenou and members of the Commission,

Thank you for the opportunity to provide written testimony today. I appreciate the commitment shown by the Cannabis Regulatory Commission to taking public comment and developing an equitable and accessible cannabis industry in New Jersey. I am submitting comments in two parts, with this as Part I.

My name is Jennifer Cabrera and I live in Cranford. I was born and raised in Newark, where I lived until I was a teenager. My father emigrated from Cuba when he was 6 years old, along with his parents and siblings. His father started a small business importing Spanish and Latin American foods which he sold wholesale to bodegas in North Jersey and New York. His mother had trained as a lawyer in Cuba and worked as a bookkeeper for various businesses and managed the accounts for her husband's business. My mother comes from a working-class family based in and around Newark, many of whom were lifelong union members.

My family background and their experiences as small business owners, manufacturing workers and immigrants leads me to consider the cannabis industry as an engine for economic development for small businesses and non-university educated workers in New Jersey.

New Jersey's legalization of cannabis presents a unique and short-lived opportunity to develop a vibrant and local industry, where all parts of the supply chain are confined to New Jersey. This highly local feature of the cannabis industry will likely change after federal legalization and interstate commerce is permitted. If New Jersey acts quickly, a robust industry of locally-owned businesses can flourish and will be more competitive regionally and nationally before the market changes.

Conversely, if regulations impose unduly onerous restrictions on small business operators like microbusinesses, few of these license holders will survive. Crucially, fostering a vibrant industry for microbusinesses will offer far more opportunities to those affected by the war on drugs and New Jerseyans of color than an industry that is only accessible to well capitalized businesses.

Since 2019, I have worked with Vicente Sederberg LLP, a law firm that works exclusively with clients in the cannabis and hemp industries, representing license-holders large and small, non-profits, and government agencies. My colleagues were influential in drafting and passing Amendment 64, legalizing cannabis for adult use in Colorado. We have also advised regulators and municipalities on implementing adult use legislation in states including Colorado, Massachusetts, and Vermont.

My comments on microbusinesses follow.

Microbusinesses

- The regulations should allow microbusinesses to occupy a space larger than 2,500 square feet for ancillary activities, including storage, packaging, security, and other administrative and office functions. In particular, a cannabis cultivator must be allowed to occupy more than 2,500 square feet of growing space measured on a horizontal plane for operational and administrative functions, including nursery/propagation, trimming, drying, and packaging.
- The regulations should clarify the steps that a microbusiness license holder must take to convert their license into an annual license.
- The regulations should permit multiple non-retail microbusinesses to share a facility to the extent permitted by local law. Section 19(f)(2)(c)(ii) of A21 does not forbid the co-location of multiple microbusinesses and expressly allows the co-location of a microbusiness cultivator with a non-microbusiness cannabis cultivator. A21 limits microbusinesses to “occupying an area of no more than 2,500 square feet.” This footprint is significantly smaller than most commercial properties. If multiple microbusinesses cannot share space, licensees will be forced to occupy more space than can be used for licensed activity, which would exclude many of the small and local businesses that the microbusiness classification aims to target.

Jennifer
Cabrera

7/14/21

Dear Chairwoman Houenou and members of the Commission,

My name is Jennifer Cabrera, attorney with Vicente Sederberg LLP, a law firm active nationally in this industry and with its New Jersey office located in Cranford. I discuss my background and interest in this issue in a separate comment I have submitted on the regulation of microbusinesses. These are my further comments for your consideration.

Impact Zones

- The Commission should provide a list of impact zones.
- Section 19(e)(1) of A21 stresses that the Commission will prioritize applications on the basis of impact zones. However, the statutory definition of impact zones is complex and relies on data that is not publicly available. Based on publicly available data, many municipalities that have been badly hurt by the war on drugs would not qualify because their unemployment rates are not within the top 15% of New Jersey municipalities. For example, Trenton may not qualify as an impact zone because of its insufficiently high unemployment rate. I therefore request that the Commission clarify which municipalities will qualify as impact zones.

Clinical Registrants

- I respectfully request that the Commission provide a timeline for when applications for clinical registrant licenses will become available.
- Section 13(b) of A21 states that “The commission shall, no later than 90 days after the effective date of P.L.2019, c.153 (C.24:6I-5.1 et al.) or upon adoption of rules and regulations as provided in subsection c. of section 18 of P.L.2009, c.307 (C.24:6I-16),

whichever occurs first, begin accepting and processing applications for five clinical registrant permits.” 90 days after the effective date of A21 was May 22, 2021.

- When the Commission does issue an RFA for clinical registrant licenses, it should confirm that cultivation licenses issued to clinical registrants will not count toward the limit of 37 simultaneously licensed cannabis cultivators for the 24 months after the effective date of A21 (i.e., the two-year period ending February 22, 2023).

Service of Food and Non-Alcoholic Beverages in Cannabis Consumption Areas

- The regulations should allow the sale of food and non-alcoholic beverages to customers for on-site consumption at cannabis consumption areas.

Under Section 28(g)(2) of A21, “[a] medical cannabis dispensary, clinical registrant , or cannabis retailer holding a cannabis consumption area endorsement shall not sell alcohol, including fermented malt beverages or malt, vinous, or spirituous liquor, sell tobacco or nicotine products, or allow the consumption of alcohol, tobacco, or nicotine products on the premises, or operate as a retail food establishment.”

This language properly restricts all sales of alcoholic beverages and nicotine products, and forbids the location of cannabis consumption areas at grocery stores or other retail stores selling food to the general public.

The Commission should clarify that a cannabis retailer serving food and non-alcoholic beverages for on-site consumption by customers in a licensed cannabis consumption area is not considered a retail food establishment.

Thomas Nolasco

7/14/21

The NACB is a national cannabis trade association that develops standards and best practices for its members and the cannabis industry. The NACB has developed advertising standards and packaging and labeling standards for the industry. Our advertising standards can be found at <https://www.nacb.com/advertising>. They address, among other items, signage for cannabis dispensaries, what’s required (adults only, health risks), what’s prohibited (false statements, that product is “safe”, depictions of ingesting, characters, driving) , digital, product placement.

Our packaging and labeling standards can be found at <https://www.nacb.com/national-standards-packaging>. These standards address how a cannabis product must be packaged and labeled prior to any sale or transfer of the product. We address child-resistant packaging, conformance certificates, labeling the product for THC and content, product identification, warnings and prohibited statements (nothing false or misleading). I have also submitted a speaking request should the commission have any questions.

Thank you.

Nicola Batten

7/14/21

Hello, I am a consultant for cannabis businesses applying in competitive, merit-based cannabis licensing application processes, and have been through over 23 state's and numerous local application processes for cannabis business licenses. I see the similar threads of advertising, packaging, and labeling, throughout each state's cannabis program, and they usually mimic each other.

Here's what I would recommend based on my experience:

- The number of poison control cases that have increased are in the single digits, and no children were hurt or died after accidentally consuming cannabis. Preventing your child from consuming cannabis is the responsibility of the parent, not the regulated cannabis industry. The images that were shown during the meeting were ALL non-regulated cannabis products. Interesting how there's no evidence of regulated, well labeled, securely packaged cannabis products that have poisoned children? I'm not saying that labeling and packaging should be child proof and resistant, but the poison control argument is over exaggerated.
- The Commission has the authority to draft and promulgate responsible rules regarding advertising, packaging, and labeling, among other matters, and should not make regulation unreasonably burdensome for cannabis businesses.
- It's common to prohibit cannabis advertising, marketing, branding, labeling, and packaging to not appeal to minors. Define how cannabis businesses can ensure they fit your expectations as to what would be considered not appealing to minors. What exactly is prohibited?
- With the statute provisions on packaging, branding, and marketing, are open for interpretation, you should create a simple process of approving packaging etc. before it is released to the public, and charge a fee for the review.
- There is only so many packaging that meets the Poison Prevention Packaging Act of 1970, especially for "liquid nicotine containers." I recommend going with the ATSM guidance and require all packaging to be ATSM certified.
- Cannabis businesses must include a warning that 'adequately informs consumers about safe cannabis use and warn of the consequences of misuse or overuse.' That is highly ambiguous and must be defined by regulation.
- Strain, types, generic, or 'slang' names for cannabis are all the same thing. There is no scientific term, other than 'cannabis sativa,' and that doesn't give the consumer much information. Just stick to strain names.
- There is only so much you can fit on a container for cannabis. The extensive information required should be allowed to be a obligatory insert or supplemental information provided with the product, not necessarily on the label itself.
- The standard dose of cannabis is 10mg, when in the form of a product. So, stick with that.
- It's fine to set serving size limits, but don't limit the THC potency of cannabis or cannabis products. This unduly hurts the industry, innovation, and have the effect of consumers going to nearby states (New York, Connecticut, Virginia, etc.) and purchasing their cannabis products because their products are not limited to an arbitrary potency limit.

Lastly, please make advertising, marketing, branding, labeling and packaging requirements and prohibitions clear and unambiguous in regulation. You could require them to be reviewed and approved before use, while collecting a small fee. But please refrain from making these regulations ambiguous, subjective, and overly restrictive or complicated. Thank you for your consideration.

Chloe Grossman

7/14/21

Chairwoman Houenou, Commissioners, and Executive Director Brown,

Cannabis packaging and labeling rules are critically important in all regulated cannabis programs as they have meaningful impacts on public health and safety, legal cannabis businesses, and overall program success. This area of policy is complex and has been investigated at length by various groups, some of whom have produced comprehensive and thoughtful policy recommendations on

the topic. Rather than summarize their work or draw attention selectively to areas of interest to our company, we would like to share a resource (in addition to those referenced by speakers) that may be helpful as the Commission develops New Jersey's cannabis packaging and labeling regulations.

Here is a link to the Council on Responsible Cannabis Regulation's paper titled "Cannabis Packaging and Labeling Regulatory Recommendations for States and Nations": <https://mass-cannabis-control.com/wp-content/uploads/2017/12/111717CannabisPackagingandLabelingRegulatoryRecommendationsforStates.pdf>

This paper contains regulatory recommendations with detailed explanations and a set of model packaging and labeling regulations that can be adapted for use. It has been a useful reference for cannabis regulators in California, Canada, Massachusetts, and other states during their rulemaking processes and even remains posted as a resource on some of these regulators' websites. The recommendations and model regulations were developed on a consensus basis over the course of a year by a diverse national committee that included large and small industry operators as well as experts in food and drug law, public health, and other relevant areas. The recommendations were also informed by findings from independent survey research and relevant areas of federal law. We hope that this resource is helpful to the Commission during this important period of regulatory development.

We would also like to echo the concerns voiced by several speakers yesterday the significant cost of packaging and labeling and the potential for well-intended rules to result in excessive costs that make it difficult for microbusinesses and start ups to survive. In order to strike the right balance, there should be consideration of whether each potential rule would have a meaningful impact on the health and safety of consumers and the public, the availability of evidence (such as public health research) demonstrating the effectiveness or value of each item under consideration, and the cost vs. benefit for operators of all sizes, consumers, and society as a whole. Environmental impacts and mechanisms for encouraging big businesses to help small businesses should also be considered.

We thank the Commission for its consideration and thoughtful approach to rulemaking. Please do not hesitate to contact us with questions or if we can serve as a resource during this process. We look forward to seeing the regulations!

Carlos Jaramillo

7/14/21

URBAN FARMS + URBAN DISPENSARIES = URBAN DEVELOPMENT

Community involvement is paramount for our operation. We will start off by listening, collaborating and involving all grass roots individuals and interested parties from the on set. We will achieve this with on the ground interaction with local authorities, community groups, social entities, religious groups and other associations to share our plans for inclusion in this nascent budding industry, that was once considered taboo.

Our cannabis business model surrounds community development through involvement. We will coordinate with the appropriate

individuals in state and local governments for sourcing and securing locations such as abandoned or unused buildings and or land, in disenfranchised communities, to start, grow and operate our business. Our plan to utilize urban farming combined with the skill sets of local and national workers will ensure participation from like minded individuals in achieving this goal. Direct investment in disenfranchised communities will prove the seriousness of bridging the gap between other established communities that will have farms and other cannabis businesses in their municipalities.

The New Jersey Cannabis Regulatory Commission (CRC) gave us a chance, in ensuring grass roots people in disenfranchised communities can have an opportunity for participation, when they created a micro business license section. Although we are waiting for the regulations to be drafted, I feel our niche strategy with urban farming and dispensing can corner a serious market share. Another core value of the CRC is reinvestment in these same communities that have been mostly affected by the war on drugs. With these core values, I feel our approach and transparency in where we do business will send the right message, at the right time, when we need a display of clarity, on how the regulated adult use cannabis market will help our disenfranchised communities. Community involvement really surrounds engaging individuals at all levels and brings value to the changing market. We will bring positive power and measurable changes in the form of employment, education, training, building, partnering, donating and reinvesting to develop and change our surroundings.

Employment: Surveys have shown since the cannabis regulations changed in New Jersey the demand and supply market have tilted to an increase in demand and access. We know when the market change happens our local grassroots individuals will see a shift to lower prices as demand and quality increases. We will solidify a strategy to decrease the effect of the changing market, by involving the individuals that will be most affected. Their skill sets will be utilized under a regulated system and the benefits of working under a license entity will be rewarding. The cannabis sector in New Jersey will create multiple jobs on many levels. Local advertising will target these same communities for qualified individuals as priority, to participate in the workforce and if qualified, will be granted an opportunity.

Education: This aspect of our strategy will not only be for our employees, but for the community at large. We will train appropriately at all levels at the business through mentoring, apprenticeship, classroom and certification programs to ensure responsibility and accountability. Community education will emphasize safety while using our products, and engaging charitable and non-profit organizations for coordination which will strengthen our outreach efforts for positive involvement.

Training: Our pilot urban farm model and dispensary will be co-joined to ensure minimal efforts with transportation, security and other ancillary costs. Implementation of a Urban Cannabis Farm (UCF) model, will create a model which will train and educate our entire company personnel, community groups, and selected individuals on the operations of an urban entity. The training will be conducted as needed by our experienced educat

Bill McKee, Jr. 7/14/21 During the July 13th meeting I was one of the speakers and mentioned several regulations that I feel are important and should be put into place here is my list;
 1) Lobbyist's should be prohibited from applying for and receiving permits or license's for any marijuana business. I also feel they should be prohibited from owning any part of a marijuana business such as is the case in Boonton Township. They have an unfair

advantage and can use their political power to get their way with officials which isn't in the public's best interest.

2) Marijuana businesses should be prohibited from sending or allowing employees whether paid, volunteer, etc. from attending any municipal public meetings to listen in. This gives the strong indication that they are being very sneaky with their operation and trying to force the officials to cater to them. This is an ongoing problem in Boonton Township and I would assume could be in other towns.

3) Anytime a marijuana business has official business that must be conducted at a public meeting the public must be notified one month ahead of time. The town administrator must be told to use all forms of communication such as email, newsletter, billboard, newspaper and word of mouth to make sure the public is well aware. This is a problem currently.

4) We need regulations for the odor, noise, light and any water pollution because without them the NJDEP currently can not take any measurements of air to determine whether a marijuana business is in violation. Odor, and noise should be zero at the property line and grow lights must be sealed inside the building to prevent lighting up the night skies. Any emissions of any kind from smoke stacks, tubes, etc. should not be allowed to escape to the outside of the building. The neighbors should not have to see white smoke or vapors or smell odors of any kind.

5) You should have fines for violating regulations dealing with odor, noise, lights or water pollution. First offense should be two percent of their quarterly income per incident paid to the town.