

New Jersey Cannabis Regulatory Commission
Public In-Writing Comments
Public Meeting: September 14th, 2021

Sender	Date	Comment/Question
Marc Friedman, Esq.	8/24/2021	<p>I see a discrepancy in the regulations which makes little sense to include administrative offices, bathrooms, (and perhaps even the parking lot,) etc. in the "facility" and then in the very next provision defining the same 2500 sf as the maximum grow area. Valuable grow space will be lost creating such a problem for any microbusiness cultivator that will make the business unprofitable to construct or operate.</p> <p>§ 17:30-6.7 MICROBUSINESSES</p> <p>4. Shall have its entire microbusiness facility occupy an area of no more than 2,500 square feet;</p> <p>i. The microbusiness facility shall include all areas within the premises that are a part of the microbusiness physical plant.</p> <p>5. A microbusiness cannabis cultivator:</p> <p>i. shall have a total cannabis grow area that does not exceed 2,500 square feet, measured on a horizontal plane, and 24 feet, measured vertically above that plane; and ...</p>
Lisa Gallagher	8/24/2021	<p>Good afternoon, will you be posting a recorded video of the 8/19/2021 CRC Meeting? (I have found and read through the adopted rules).</p> <p>Thank you! Lisa Gallagher</p>
Daniel McKillop, Esq.	9/2/2021	<p>Please clarify the square footage restriction applicable to microbusiness cultivators. Which of these does the 2,500 sq ft restriction apply to?</p> <p>(a) the "Premises," i.e. "all public and private enclosed areas at the location that are used in the business operated at the location";</p> <p>(b) the "Physical Plant," i.e. the area of the canopy together with all other "spaces, equipment and infrastructure directly utilized by a cannabis business, within the Premises, for activities authorized by the Act and this chapter" (noting that "Physical Plant" is synonymous with "microbusiness facility," defined as "all areas within the Premises that are a part of the microbusiness physical plant"); or</p> <p>(c) the horizontal canopy area alone.</p> <p>Thank you.</p>
Thomas Howard	9/4/2021	<p>Will New Jersey be adopting a low-cost lottery style like Connecticut for its dispensary licensing so that it can reduce barriers to entry for priority applicants, or will it be like the fiasco in Illinois with lawsuits</p>

and long delays?

We are advocating for our clients to have less downside risk before they start on the costly licensing process so that dispensary owners can win a license for less than \$10,000 before having to hire consultants and lawyers to help with the conditional application and the annual application.

Thank you for being so open in this process, we hope that New Jersey looks to other states to assist the social equity applicants be on even footing so that have a shot to win a license before having to spent a great deal of money. After they have won a license, the money will find them.

If our firm can help New Jersey have a successful roll out, we are ready, willing and able to help so that your program avoids litigation and has a very diverse and inclusive industry.

D'onna-Marie Johnson

9/4/2021

My comments surround the rules as it pertains to edibles. In the "Final Rule Summary," under the "Safety" section, it reads "the only edible cannabis products permitted are syrups, pills, tablets, capsules, and chewable forms; cookies, brownies, or other edible products resembling food are prohibited." I agree that edibles should be kept out of the reach of children and pets; however, the Commission should strongly reconsider excluding "food-resembling" edibles from the legal cannabis market in NJ. I ask that the Commission consider the following points:

- Some people don't have children
- Children can also be attracted to pills and other small items because they like to put everything in their mouths (i.e. coins and marbles)
- The Commission need not be naive to the fact that NJ will continue to have a large "illegal" & "non-regulated" market in the cannabis industry because edibles and foods infused with cannabis are growing in popularity
- The exclusion of edibles will prevent a transparent relationship with cannabis businesses and the Commission
- The Commission would be forfeiting additional revenue as well as limiting possible advances in the NJ market
- The Commission would be disregarding the people who use edibles as a way to enjoy the effects of cannabis while also minimizing any negative reactions from bystanders
- The Commission would be disregarding the people who prefer the taste and convenience of edibles over buying and preparing cannabis to be rolled and smoked
- The Commission would not be allowing business owners the chance to implement proper packaging and labeling strategies to avoid adolescent attention
- The Commission would not be allowing parents/guardians the chance to implement proper procedures to avoid the issue within their homes
- The Commission would also be blaming an adult's irresponsibly and negligence within their own homes on a legitimate business
- Perfect Example: If you bought a taser from Amazon and your child tased you, themselves, and/or your pet, would Amazon be at fault? Now if the Commission continues to prohibit edibles, the Commission

		<p>would be implying that Amazon is at fault. However, the liability would fall on the parent/purchaser, not the supplier.</p> <ul style="list-style-type: none"> • The Commission should also note that both alcohol and cigarettes cause more life-threatening effects than cannabis; however, an alcohol bottle has a screw top and a pack of cigarettes can be opened like a pack of 5 Gum
Robert Collins	9/7/2021	What is the hold up on the licenses that have been pending for the last two years ????
Danny K	9/7/2021	How will applications be chosen as retailers if there is a large number of applicants? How will income equality discrimination be avoided?
Noah Fouad	9/7/2021	<p>When the variety of cannabis products expand will everything be priced fairly? The price of everything is very expensive already. A full gram of distillate cost nj patients just over 100 dollars. In other states distillates don't go over \$50 a gram, and anything above is taking advantage of us as patients. When the state comes out with live resin and higher quality cartridge products, will the cost of a gram cartridge be even more expensive than \$100? I believe that the pricing of everything should be focused on benefiting the patient and not the pockets of the companies selling the product. Which brings me to my second and final point I'd like to bring to the CRC's attention. If the legalization of Marijuana in NJ is based on social reform and helping communities impacted by the war on drugs, then why will NJ patients be imprisoned if they decide to grow their own cannabis? Are we forced to pay the unfair prices if we want the right to medicine? How, can you as the CRC begin to talk about social justice, when you're still arresting individuals who can't afford to pay for their rightful medicine? Please do the right thing and begin pushing for the right to grow our own medicine. The ATC's that are allowed to sell us patients medicine have mediocre cannabis product at best. Then they turn around and sell us the mediocre cannabis for \$60 an 8th (3.5g). Nj citizens are more than capable of growing cannabis that will far surpass the quality of anything the ATC's could ever produce. Let us as a state set an example for the rest of America to follow and legalize homegrow to combat the unfair pricing of the greedy companies that are coming in and stealing the licenses from the people of New Jersey. Our hard earned money should be going back to our own people instead of the vultures swooping in the moment legalization begins. You are our last line of defense against those vultures. Allow for home-grown cannabis and allow the community to create the market, instead of the vultures taking advantage of the CRC.</p>
Darrin Chandler Jr.	9/8/2021	<p>New Jersey 2019 Medical License RFA Social Equity Applicants Joint Statement</p> <p>In 2017, Governor Murphy's campaign elevated cannabis legalization as a key component in his agenda and proclaimed that new legislation would be passed within the first 100 days of his office. In 2019, the New Jersey Department of Health released a public competitive bid request for applications for 24 newly available medicinal cannabis licenses. The state encouraged companies and individuals to either apply for three (3) licensure types - 1. Vertical Integrated Operator, 2. Cultivation & 3. Retail (Dispensary).</p> <p>NJ cannabis reform touted that they would promote an equity-based accessible, diverse, and inclusive market that had been lacking. NJ also stated that they wanted homegrown citizens to enter the marketplace. However, in evaluating NJ's current licensed ATCs, none are black or brown owned or</p>

homegrown owners.

Per the RFA, companies needed to demonstrate a myriad of resources, most importantly: 1.) A viable town willing to host their cannabis business, 2.) Site control - an executed lease, purchase of real estate, and 3.) A business plan with architectural drawings, background checks, and a financial plan along with proof of capital.

Due to legal matters outside of our control, our companies along with other 2019 applicants have had to endure a 2-Year delay. The delay in scoring the applications has caused companies to maintain real estate or site control with no resolution in sight. This delay has forced applicants to absorb exorbitant fees, along with threats of possibly losing site control.

For NJ to live up to its commitments for Social Equity & Inclusion this delay must be resolved. Here are our requests to the NJ Cannabis Regulatory Commission to remediate these issues:

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1. Make an announcement for the 2019 RFA Results at the next public meeting (Sept 14th) prior to announcing the new Adult-Use RFA.

REASON: Announcement of 2019 RFA winners HAS to be made PRIOR to announcement of the new licensing round. 2019 RFA applicants cannot make sound decisions whether to apply in the adult-use market without knowing the result of their current application.

2. Increase the number of medical licenses awarded; award all 2019 applicants that meet a minimum scoring threshold. (Preferable scoring to Social Equity Applicants)

REASON: Due to the delay in the 2019 application process, New Jersey's medical cannabis program has been extremely stagnant, medical patients have been negatively affected by this. New Jersey already has qualified applicants ready to serve the community and reflect Social Equity in the Market. There is also no legislation cap on the CRC being able to issue more Medical Licenses.

3. 2019 Application Winners should be able to expand immediately / participate in the Adult-Use Market w/ No Additional Fees

REASON: 2019 Winners Shouldn't have to wait to expand as previous ATC's had, due to the 2 year delay. Also, they should be allowed to participate in the adult use market without any additional fees.

4. Prioritize 2019 Application Losers for future RFA rounds

REASON: Due to the hardships that 2019 Applicants faced, 2019 Losers should be treated similar to “Diverse / Social Equity Applicants” defined by the CRC for future RFA rounds.

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THANK YOU & BEST REGARDS

Bershan Shaw - Roundtable Wellness
Darrin Chandler Jr. - Premium Genetics Partners
Marisa Edmunds - Ital Gardens
Travis Ally - 93 ID In

Milynda Nicasia Santiago

9/9/2021

Hello, I have reason to believe that the employees working inside of our new medical marijuana industry has been tampering with the product and this needs to be addressed immediately since this involves the health and safety of the State of New Jersey. I bought cannabis from a new Cureleaf that was built in Bordentown, which was buds, prerolls, and the pens. I opened the bags and they smelled like straight vomit, feces, and farts. When smoked it was even worse the entire section I smoked it smelled horrific nothing like fresh, clean cannabis. The high was clearly diluted by the extra disgusting additives. The bud also looked compacted which also indicated it has been tampered with. Now, I also recently bought from Breakwater that resides in Cranbury and I opened the jar and it smelled like a man’s dick. This has been a recent occurrence unlike Cureleaf from Camden for example since they have been around longer and this has been happening since months of opening. Finally, the new dispensary ZenLeaf employees is also clearly tampering with the product. I opened a jar of “shake” marijuana and it smelled like complete vomit, nothing else. No one has done anything to change this issue. I have gotten an infection in my throat because of this but it’s the only thing that helps me relieve my pain so it’s sickening to say that I have to push through something like this when it could have been remedied within a few months. Had anyone checked on the products health and safety measures daily or even checked the video cameras.

Donna Lam, JD, LCSW, LCADC

9/9/2021

I am a licensed clinical alcohol/drug counselor, and I submit my comments from a prevention/treatment perspective. I live in Scotch Plains, NJ and I've learned that the township council is considering placing a cannabis growth facility in a location close to a local school: Hillcrest North Academy. Normalizing substances for children, especially before completion of their brain development, is detrimental to their wellbeing and will come at a cost to our society. I recognize that adults make decisions about substances and realistically will use them as they see fit. However, we, as a society, owe our children a duty to protect their healthy development.

Alma Saravia, Esq.

9/9/2021

My first question concerns § 17:30-6.8 LIMITATIONS ON LICENSE APPLICANTS, LICENSE-HOLDERS, OWNERS, PRINCIPALS, PASSIVE INVESTORS, FINANCIAL SOURCES, MANAGEMENT SERVICES CONTRACTORS, AND VENDOR-CONTRACTORS. In (c) and (d) of N.J.A.C. 17:30-6.8 the regulation provides that an applicant shall only have “at most” one application for each class. This sentence is consistent with (d) that the a license-holder and its owners may hold one cultivator and one manufacturing license. However, what does the CRC mean with the phrase “at most”

		<p>– perhaps it means “not more than” one application for each class? My next question concerns the language in (g) and (l) of that subsection that appears to state a limitation on owning more than one license-holder. "A person or entity shall be an owner of only one license applicant or license-holder" Perhaps the CRC means that that an owner can't be more than one license-holder “per class”? Finally, when will the CRC issue the Notice of Applications Acceptance? Thank you. Alma Saravia, Esq.</p>
John Barnabas	9/10/2021	<p>When will the CRC make an official recommendation to the legislature in support of homegrow? The commission needs to do more to advocate for the consumers and patients in this state.</p>
Kristen Goedde	9/10/2021	<p>My comment refers to the allowable variance in manufactured products noted in 17:30-11.5 (d) 3. i of 95-105%.</p> <p>References: JCGM 100:2008, Evaluation of measurement data — Guide to the expression of uncertainty in measurement https://www.bipm.org/documents/20126/2071204/JCGM_100_2008_E.pdf/cb0ef43f-baa5-11cf-3f85-4dcd86f77bd6 USDA Hemp Testing Guidelines https://www.ams.usda.gov/sites/default/files/media/TestingGuidelinesforHemp.pdf</p> <p>The measurement of uncertainty is established in ISO 17025 laboratories per analyte and take into consideration the reproducibility and repeatability of the method employed, as well as equipment and reference material uncertainties. With every measurement, mass, and volume taken, there is a level of uncertainty that must be considered. For example, an ISO calibrated 1000uL pipette may have an uncertainty of +/- 1.4uL, or 0.14%. Every time a volume is measured with that pipette, the overall result uncertainty increases. Certified reference materials manufactured under ISO 17034 used for establishing calibration curves also have uncertainties ranging from 0.5-1.3%. Simply formulating calibration solutions result in 2-3% uncertainty from the combined CRM and pipetting uncertainties.</p> <p>Uncertainty budgets are also required under the USDA hemp program to report a margin of error associated with the total THC analytical measurement (ex. 0.30% THC +/- 0.05%). An uncertainty budget combines the sources of uncertainty and expands the uncertainty to a 95% confidence interval. The example margin of uncertainty noted in the USDA hemp testing guidelines reflects a 16.67% uncertainty associated with the total THC result. Generally, laboratories report an expanded uncertainty measurement of 15-20% of the measured value.</p> <p>Using this information, I believe it is unreasonable to enforce a 5% acceptable variability in manufactured products.</p> <p>I suggest: - Increasing the allowable variation for manufactured products to 20%; or</p>

		<p>- Conduct annual inter-laboratory comparison studies to establish and monitor acceptable variability across the laboratories in state; or</p> <p>- Account for the laboratory's uncertainty measurement and enforce reporting of uncertainty measurements for THC content, as is the case in the USDA hemp program requirements. Ensure that the labeled result is within the uncertainty measurement established by the laboratory. Due to the presence of laboratory shopping in this industry, it is also imperative to ensure that the uncertainty budget established by the laboratory is reviewed and verified by the CRC as legitimate and not falsely increasing acceptable variation ranges.</p> <p>I would be happy to discuss in detail and share our uncertainty budgets for further clarification.</p> <p>Thank you for your time,</p> <p>Kristen Goedde Founder & COO Trichome Analytical</p>
Mario Rodriguez	9/10/2021	<p>We have questions regarding testing. How will pathogen testing be conducted for edibles vs. flower? Will the CRC have different rules for edibles that adhere to current regulations for food production? How are these regulations / best practices being created at this point?</p>
David Avedissian	9/14/2021	<p>Are the same amount of bonus points awarded for applicants Collective Bargaining Agreements and Labor Peace Agreements. In other words, will a CBA and LPA be worth the same point award if in place when the entity makes its application.</p>
Kevin G. Babilonia	9/14/2021	<p>Hello,</p> <p>I am the owner and founder of www.theskunkfather.com . I am an E-commerce business at the moment selling apparel and accessories. I am trademarked TM and am currently waiting to hear back as to when the licensing 180 window will begin. I am looking to obtain a cannabis adult use dispensary license in the retail space. I also have a Business plan attorney and consultants ready to help with the application process, but it has come to my attention that the CRC is not allowing the sale of baked goods and gummy bears. I wanted to say that will effect my business model as that is 18% of my business plan and this will ultimately effect business. I am asking that you take the time to review this and to take a look at how other States are doing with this, like California, Colorado, Oregon, and Massachusetts. Maybe the idea of putting a cap for micro dosing may be an option? 10 to 15 mg per gummy and, 20 to 30mg per cookie, brownie or rice krispie treat. Whatever the decision please take into consideration that micro dosing will be a more desirable, less potent, and more effective for control. Allowing the sale of baked goods and edibles is a win win for all. Most older people and those who choose not to smoke or vape like the fact of having this option as another mean of consumption. I hope you understand and can come to a reasonable conclusion and decision. Reconsidering this will allow more revenue for the municipalities and the state. Thank you for your time and I yield back.</p> <p>Kevin G. Babilonia</p>

Donna Ross	9/14/2021	When are you announcing the 2019 RFP winners? Will there be another round for medical cannabis processing?
Aaron streater	9/14/2021	Ok my thing is how can the mico business thats located in the impact zone afford the 4000p lbs of follower where is thou the I legacy guys can get it at a price of 2000lbs for the follower..And is there going to be a restriction on how much THC will be in the follower.. every time i go to the dispensery its not as good as i get it from the legacy street guys..
Nicholas Cody	9/14/2021	Noting a discrepancy on the size limitations of a micro cultivation center. The statute does not limit the total building square footage to 2,500 sf., but the area on which cannabis is grown. The CRC rules and regulations have expanded this limitation to include the total area of the building in which cannabis is grown. This will make it impossible for micro cultivation centers to be profitable.
Dhrumit Kabariya	9/14/2021	I have a question. For a person to apply for Cannabis Business, is there any help or guidance service provided by the state in order to ease the process of applying for a lower-middle-class person and allow them to open a business with very little capital.
Jacov Kaufman	9/14/2021	<p>Thank you CRC committee members, for the opportunity to comment during this meeting today. My name is Jacov and I represent Ruuted, which is a group of 5 self-starting talented people from a wide variety of professions.</p> <p>We've been working on this company venture for almost a year.</p> <p>Most of us are New Jersey residents and we are all about setting roots in the community and helping others do the same.</p> <p>We are committed to helping and contributing to our community.</p> <p>For example, we plan to</p> <ul style="list-style-type: none"> employ a majority of single moms and new legal immigrants educate our employees help them to find a profession and earn a decent wage. <p>We are interested in opening a Dispensary.</p> <p>During the course of last year, we have been following the developments of your excellent committee and believe the state regulations which were approved during the last meeting provide a fair opportunity to a small and motivated group like Ruuted to start and succeed in such a business.</p> <p>Reading all the laws we have no issues to adopt all the sections you have written.</p> <p>However, we find it extremely difficult to navigate the rules of the municipalities, Zoning and local licensing especially.</p> <p>As of now each municipality sets their own rules which may or may not be aligned with the same state-level values of inclusion and fair opportunity.</p> <p>That includes, but not limited to:</p> <ul style="list-style-type: none"> setting a total number of how many small local dispensaries are allowed within their borders no distinction between small local business vs. multi-state large businesses setting how high the initial application and license fee is, which applies favoritism to large known players in the industry

		<p>We find this situation a bit worrisome since it may not allow for many new, smaller companies to thrive in this setting.</p> <p>We are also not sure if we should be applying through the State-level or municipalities first</p> <p>We appreciate any help working with municipalities, or working through the application process</p>
Patrick Hubert	9/14/2021	<p>As I'm planning to open a recreational dispensary, one problem I've encountered already is banking. For example, TD Bank will not allow a cannabis business to open a business account. In other legal states, there are banks that will not allow employees of cannabis businesses to deposit a check into their personal account from a cannabis business. These banks have said it is due to the federal legality of cannabis. I have received confirmation from TD Bank that they will deposit the checks for employees, however not all banks have been that way. Will there be any safeguards for not only the cannabis businesses, but for the employees as well when it comes to the legalities around banking?</p>
Julianna Umerov	9/14/2021	<p>Good evening,</p> <p>My comment is more of a question than it is a comment that I'm hoping might be addressed in the next meeting. I am located in Monmouth County, NJ. I find that most of the surrounding towns have banned all personal cannabis use and business. Being that the requirements to obtain a micro license entail that you must be a resident of the municipality in which the business will be established or a neighboring municipality, will there be any lenience on this requirement due to the fact that most municipalities have enacted ordinances prohibiting business and personal use of cannabis? I feel that this is unfair to people who would qualify as a micro business and wish to engage in a cannabis business but are unable to do so due to this requirement. If an ordinance has not been passed in a town that is up to maybe a half hour commute from the owner's residence, will the commission make any exceptions for applicants who are facing this problem? Does the commission have any suggestions on how to accommodate people facing this problem other than requiring them to relocate their residence?</p>
Norman Gates	9/14/2021	<p>My name is Norman Gates and I am not in favor of MSOs that are not majority minority or donate atleast 50% of their revenue to BIPOC charities to operate any service in the Great State of New Jersey.</p>
Osbert Orduña	9/14/2021	<p>Hello members of the New Jersey Cannabis Regulatory Commission, I would like to start by thanking you for the work that you have done and will continue to do as you lead us on this journey. My name is Osbert Orduña, I served in the United States Marine Corps during Operation Iraqi Freedom and, while there, I earned my certification as a service connected disabled Veteran.</p> <p>I am the founder and CEO of a New Jersey based business called The Cannabis Place LLC. At The Cannabis Place, we are led by entrepreneurs of color, who grew up in public housing and low income neighborhoods that were areas disproportionately targeted in the War on Drugs, where we were impacted both directly and as collateral damage.</p> <p>At The Cannabis Place our intent is to secure licensing as a Diversity applicant, to have an opportunity to launch dispensaries that will be UFCW - UNION shops from day one, providing the local New Jersey communities where we are located with real career opportunities, with strong living wages, excellent medical benefits, robust retirement and focused career development opportunities. The Cannabis Place is</p>

the true definition of a small business that wants to be an active and positive member of the community.

I am reaching out to bring your attention to a major issue of inequality that currently exists with-in the published regulations. I would like to bring your attention to section 17:30-6.4 DIVERSELY OWNED BUSINESSES, item a) states that until the time that the commission develops its own certification process a “Diversely Owned Business” means a license holder that has been certified as a minority business, as a woman’s business, as a disabled veterans’ business, by the Division of Revenue and Enterprise Services in the Department of the Treasury. This is exactly where the problem lies and where the inequality with the certifications lies. In order for an entity to be certified as a minority or women owned business by the Division of Revenue and Enterprise Services an applicant has to submit various supporting documents and a notarized statement. The same can be said for the Service Disabled Veteran owned business designation except that in order to meet the requirements of N.J.S.A. 52:32-31.2, the service disabled veteran business owner must also be a resident of New Jersey, neither the MBE or WBE programs have this New Jersey residency requirement and thus service disabled veteran businesses are held to a different and more stringent arbitrary residency standard.

A person is not born a Service Disabled Veteran. In order to earn this designation a few things had to have happened; first, you volunteered for military service and then, during the course of your military service, you were injured in the line of duty. Service Disabled Veterans are people who served our country and who for example, the US Government has deemed have earned the moral obligation of our nation to provide the disabled veteran a range of benefits designed to ease the economic and other losses and disadvantages incurred as a consequence of the disability received in service to our Nation.

I ask that that the New Jersey Cannabis Regulatory Commission review and issue their own certification process for what constitutes a Service Disabled Veteran Owned Business and remove the New Jersey residency requirement so that the SDVOB certification can mirror the terms of the New Jersey MBE and WBE certifications, which do not have a residency requirement for the majority owner, and provide Service Disabled Veteran entrepreneurs with an equal access to certification as a Diversely Owned Business and to the New Jersey Cannabis marketplace.

Igor Hutyum

9/14/2021

Hello,
As commissioner Barker suggested, I'm just reiterating my public comment from the Zoom meeting today.

My concern about the current situation of personal-use cannabis is the new businesses that have sprouted up called gifting businesses. The business model is as follows: customers order a beverage, food, or merchandise from a New Jersey located online shop with an optional gift of cannabis. The order is delivered to the listed address and under the driver's discretion, drivers may or may not offer the optional cannabis gift selected.

The cannabis they gift is not in any way legally grown in New Jersey or moved into the state legally.

		<p>This gives them an unfair advantage to bypass acquiring a cannabis adult-use license, testing requirements, applicant requirements, and overall following the mandates listed in the N.J.A.C. 17:30 bill.</p> <p>I understand this possible loophole wasn't expected by the Commission or state officials but I hope I've done a good samaritan in bringing attention to it.</p> <p>Thank you for allowing me to speak and raising this concern today. I appreciate the hard work you've done for New Jersey.</p> <p>-Igor Hutyum</p>
Ronald Hrabal	9/14/2021	<p>Hello I am a 60yr old disabled plumber on SSI and presently on nj medical cannabis and prescribed 3 oz a month which cost \$1,500.00 a month I only receive \$ 1400.00 a month which leaves me 100.00 for gas to get to my dispensary 4 x a month ! So unless you allow me to home grow or give me weed at discount I am screwed! Please allow me to grow in my own home so I don't have to drive 4 hrs a month! Please allow me to grow at home ? The thought I would sell is ridiculous And there are laws to deal with anyone who sells weed on black market anyway ! Grant disabled the god given right to grow there own medicine ! Thanks that's the only fair way</p>
Jason Bacon	9/14/2021	<p>My comment concerns specific regulations governing cannabis cultivator microbusiness licenses:</p> <p>First, a Microbusiness Cultivator's facility should not be limited to a maximum of 2,500 square feet because the CREAMM Act specifically states that a Microbusiness Cultivator may cultivate cannabis in an area up to 2,500 square feet. Id. at 63. Yet, this regulation does not take into consideration that the mature cannabis plant grow canopy will consume roughly 50% of the total cultivation facility, as the rest of the establishment is comprised of plants growing in the vegetative stage, including seedlings, clones and mother plants, along with various other areas needed for trimming, curing, packaging and storing cannabis, and other areas for equipment storage, restrooms, etc.</p> <p>Moreover, most of the limited sector of municipalities that have passed ordinances permitting recreational cannabis businesses to operate in their jurisdiction have restricted cannabis cultivators and manufacturers to their industrial or heavy commercial zoning districts. It has been my experience while searching for commercial properties within this very limited section of an already very limited group of municipalities that the typical properties available are usually quite a bit larger than 2,500 square feet. Thus, in order for a Microbusiness Cultivator to be in compliance with State and local regulations, it seems evident that this impediment would likely force the applicant to secure a location that would be much larger than they would actually be permitted to utilize, thereby creating more unnecessary financial barriers to enter the marketplace by way of a much higher lease or purchase price, which undermines the social justice aspect that the microbusiness license was intended to effectuate.</p> <p>If the Commission is statutorily precluded from amending its regulations to permit a Microbusiness</p>

Cultivator's establishment to be more than 2,500 square feet, than at very least, it should amend 17:30-10.4(b)2. so that it does not apply to Microbusiness Cultivators. This would be a material amendment to allow Microbusiness Cultivators confined to a very small footprint the opportunity to maximize what limited space they have (especially if they are forced to lease a much larger establishment than they can legally utilize), and also keep things fair amongst cultivators from different geographical locations. For instance, if a cannabis cultivator were to locate its establishment in a greenhouse or outdoors in a rural area, it could quite easily cultivate plants that are three times the size of those grown in an urban warehouse (as they would be allowed to grow up to 24 feet high), producing three times the yield of finished cannabis. This would be quite the unfair advantage for the rural cultivator whom located its business just one town over from the same cultivator in an impact zone whom is confined to smaller ceiling heights and artificial lighting in a warehouse. Nevertheless, the Commission can neutralize this imbalance for the urban impact zone cultivator by amending 17:30-10.4(b)2., which would permit Microbusiness Cultivators to grow their mature cannabis plant grow canopy with a vertically tiered shelving system up to 24 feet tall, where the upper levels DO NOT count towards the total mature grow canopy maximum of 2,500 square feet.

Thank you for the consideration of my comments, and I look forward to applying for a Microbusiness Cultivator license as a social equity applicant when the time comes. I very much appreciate that the Commission held true to its mission, and made equity one of its core issues, which is deeply woven into the initial rules that were released last month.

With gratitude,

Jason Bacon

Brandon Chewey

9/15/2021

Sorry, I intended on speaking at today's meeting (September 14, 2021) but I was stuck in a meeting until 8pm. Apologies for missing my scheduled testimony.

Greetings NJ CRC,

My name is Brandon Chewey. I'm a person 8+ years in recovery from an 11 year heroin addiction via the use of specific cannabinoids, Terpene profiles & select strains.

I have been arrested over 30x for non-violent, victimless drug "crimes" in Monmouth County & I have just been released from probation (3 weeks ago) for the first time in my adult life... I am free to cross state lines - without giving 30 days notice- or peeing in a cup, for arrests of cannabis which jailed me for a collective of 6 years, introduced me to drug court (2008) & disenfranchised my youth, as well as my entire adult life for an herb that I knew was the only medicine beneficial for me.

I founded the Asbury Park Cannabis Community Inc. in 2017, as I was just under 3 years in recovery (on methadone/M.A.T.) & had just became a legal "N.J.M.M.P." in late 2015...while on probation (after a

very corrupt trial in which I plead guilty after exhausting lawyer funds from the \$130,000 bail that was given to me for 2.5 ounces of cannabis - as an NJMMP)

The Asbury Park Cannabis Community Inc. was formed to establish a standard for the culture, economics & patients rights/information to the NJMMP, along with doctor referrals.

2 months after finding the non-profit, Asbury Park Cannabis Community Inc. I founded Shoreganix LLC. (Just 2 years free from 11 years addiction) as I had found recovery from opiates & wanted to share it with all - as my friends/former affiliates are still dying weekly due to our opioid epidemic... it never gets easier.

I am blessed & was spared from death unlike my countless friends... my family says God has a plan for me to help others. Since finding sobriety via cannabis - it has been my obsession, passion & therapy. *The therapuetic value in home cultivation/breeding select strains for specific client diagnosis is so extremely life changing for so many.

I would like to thank you for all of your work & difficult task in selecting the appropriate licenses/people to represent an industry that was developed/innovated by "criminals" for 70+ years.

This leads me to my question.

As a person in recovery, I've built wealth just under 100k to my name after 8 years of fighting sobriety, advocating, running my businesses & working passionately to help others find relief from opiate addiction, successfully.

My question is this. I have approx 70k to my name, spent the last 11 years fighting for freedom from addiction that began when I was "probated" from consuming cannabis at age 18.

I've been released from probation just 3 weeks ago for the first time in my adult life at age 36... do I have a chance? Risk is

My question is this, dk you genuinely believe a person like myself, who was just released from probation (1 year early for compliance & \$6380 in fines, for 2.5 oz pot arrest from 2015), whom has saved just 70k after 18 YEARS of pot arrests - would be wise to apply for a "legal license", knowing the costly legal, as well as license/compliance fees needed to begin a micro grow facility?

I know the question is speculative, but honest in fact. My lifes work is breeding organic, living soil cannabis for medical diagnosis treatment.

In order for me to successfully apply, I would have to sacrifice everything I've worked for - take out

		<p>loans, use the money from the non-profit & that would leave me living paycheck to paycheck, as a person who has done WELL post-rehabilitation/incarceration versus the majority whom face 11yr opioid addiction.</p> <p>Again, thank you for all you do, I would love to apply, but if standing the "best chance to win" depends on having the property the fastest, the team the fastest, best atty- that will empower the black market</p> <p>I consult w/ many seeking license in 2 categories. Those w/ money/investors etc. Then, us felons w/ 70k & loans. Worth Risk?</p>
Clarence K. Carter	9/15/2021	Is the CRC going to create a cannabis loan program to help people get started in the cannabis business because starting a cannabis business is a costly undertaking?
Michael Skarn	9/15/2021	Request to comment
James Dieciddue	9/15/2021	<p>Cannabis and cannabis product testing/labeling processes should follow science to avoid public health emergencies like EVALI in 2019. Processes and practices should be updated regularly to reflect current science and reduce potential harm.</p> <p>Mold testing: In addition to current interim testing standards, cannabis should be tested for Aspergillus mold (has caused deaths) and others recommended by Journal of Natural Products[1].</p> <p>Aerosol testing for vape cartridges: Vape cartridges should require aerosol testing (gas-phase and particulate-phase) to identify and keep up with potential concerns in manufacturing and to quantify user exposure. Colorado has done this, and aerosol testing is recommended by the FDA for nicotine ENDS. Cartridges have been found to contain PTFE, which can produce harmful gasses after 300C[2], vape cartridges can potentially reach 1000C[4]. Silicons found in medical-grade cartridges can form silicon dioxide, which is very toxic[3]. Neither of these components are tested for, yet they are known to be able to produce symptoms like chemical pneumonitis, which was cited in EVALI cases.</p> <p>Expanded metal testing: Metal testing should include the quantification of Nickel, Manganese, and Cobalt, which have all been found in vape cartridges and are linked to serious disease.</p> <p>Better labeling for vape cartridges: Along with more comprehensive testing, vape cartridges (because they are a manufactured product) require better labeling. All/any foreign additive/flavoring must be labeled. Terpene type, the respective percentage, and whether or not they are foreign must be labeled as such. The total percentage of 'other plant matter' should also be displayed, as lipids and other natural plant components may be concentrated in combinations that do not resemble the initial cannabis flower. This has the potential to release new</p>

		<p>isomers, oxidative byproducts, and degradants not typically present in cannabis smoke, which can result in new harm profiles [5].</p> <p>[1] https://pubs.acs.org/doi/10.1021/acs.jnatprod.9b01200 [2] https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7571715/#!po=7.50000 [3] https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7355865/ [4] https://pubmed.ncbi.nlm.nih.gov/29672571/ [5] https://thecannabisindustry.org/wp-content/uploads/2020/01/NCIA-Safe-Vaping-WP_Jan27_v3.pdf</p>
Jason Bacon	9/15/2021	<p>Concerning a conditional cannabis microbusiness license, I am urging the Commission to eliminate the stipulation under 17:30-7.3(c)14. that a microbusiness applicant must reside in the municipality or a bordering municipality in which the business will be located at the time of the application submission.</p> <p>This would require someone such as myself who is a social equity applicant whom resides in a county where every single municipality banned recreational cannabis businesses to move to the municipality where I wish to locate my microbusiness in advance of receiving an answer as to whether my conditional application was successful. This stipulation should ONLY be required for approval of the conditional cannabis business conversion license.</p> <p>To be clear, I intend to reside and locate a cannabis microbusiness in an impact zone, but I should not be required to move to this municipality prematurely, especially in the case of submitting a conditional microbusiness application without knowing whether or not same would be granted.</p> <p>Thank you for your consideration of my suggestion.</p> <p>Sincerely,</p> <p>Jason Bacon</p>
Leeanna Roman Lozada	9/15/2021	<ol style="list-style-type: none"> 1. Where do we get a full list of what cities are allowing, their requirements and procedures. What are their forms and ordinances? Many are not allowing. 2. How does someone choose to apply for micro business or regular license. Can they apply for both for example Class 4 micro and regular application?? How do we know which is best to apply or do we always apply as a minority as an extra point? 3. What are Microbusiness business limits in licenses 2, 4 and 6 transport ? Will they be able to deliver in the full state? 4. Edibles should be included since around 50% is used in food products or byproducts. many people dislike the smell and the smoke. It is a huge health market. Revenu and tax will be a missed opportunity too great to avoid. Enough safety and ingredients exist to monitor for safety.

		5. I loved the vape checks comment. i agree my son vapes and the metals and extra are concerning. toughest vape checks would be excellent.
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