

New Jersey Cannabis Regulatory Commission
 Public In-Writing Comments
Public Meeting: October 30, 2024

Full Name	Meeting Date	Comment
Julio Casados	10/30/24	<p>October 31, 2024</p> <p>New Jersey Cannabis Regulatory Commission P.O. Box 420 Trenton, NJ 08625</p> <p>Dear Commissioners of the New Jersey Cannabis Regulatory Commission,</p> <p>I am writing as an MWBE dispensary owner and member of an impacted community in New Jersey, where my business proudly serves diverse customers, employs local residents, and actively supports community revitalization. As a person of color, with family members who have been directly impacted by the War on Drugs, I wholeheartedly acknowledge and support the Commission’s commitment to redressing the harms of cannabis prohibition through the Social Equity Excise Fee (SEEF). The fee’s intent to drive meaningful reinvestment in communities like mine is commendable, and I am deeply appreciative of the Commission’s work to build a fair, inclusive cannabis market.</p> <p>However, I urge the CRC to reconsider the proposed drastic increase in the SEEF from \$1.24 to as much as \$30 per ounce. As an independent operator, I know firsthand the steep challenges faced by small business owners in the cannabis industry, especially those from historically marginalized communities. This significant increase, if enacted, would impose severe financial strain on independent businesses and, regrettably, may have the unintended effect of pushing many of us out of the market altogether. Such an outcome would be contrary to the CRC’s goal of fostering equitable industry participation, as it would create an economic climate in which only large multi-state operators (MSOs) can compete, both in the short and long term.</p> <p>A significantly more gradual increase, phased in over several years, would allow operators like me to stabilize and find our footing in this emerging market. This approach would help us manage the operational costs associated with SEEF compliance while continuing to contribute positively to our communities. A sudden, sharp increase, however, threatens to disrupt these efforts and limit our potential for growth, which is essential to building sustainable, community-rooted businesses. It is my belief that a gradual, thoughtfully implemented fee structure would balance the CRC’s revenue goals with the need to support New Jersey’s diverse, independent cannabis businesses.</p>

		<p>The SEEF is a vital component of New Jersey’s commitment to social equity in cannabis. By considering a phased approach, the CRC can maximize long-term impact while fostering a competitive, inclusive market that enables diverse entrepreneurs to succeed.</p> <p>Thank you for your attention to this critical matter. I am hopeful that, together, we can ensure that New Jersey’s cannabis market remains fair, vibrant, and inclusive for all.</p> <p>Respectfully,</p> <p>Julio Casado CEO ANJA Life LLC</p>
Gian Lombardi	10/30/24	<p>Director Riggs,</p> <p>By way of intro, my name is Gian Lombardi and I’m a co-founder and part owner of Molly Ann Farms LLC, a Class 5 Cannabis Retailer operating in the Impact Zone of Haledon, adjacent to the Economically Disadvantaged city of Paterson.</p> <p>We believe strongly in the legal, regulated cannabis market and compete fiercely with the vibrant illicit market (a.k.a. "the trap") every day, whether it be illegal delivery services, longstanding local dealers or nefarious smoke shops that sell THC products. The biggest reason more people in our area still buy untested, less safe cannabis on the illicit market is because of price. One only need look at our Google reviews to see the #1 complaint about our dispensary is price, and we work very hard to keep low priced items on the menu. You can also look to the California market where years after legalization, over-taxation has hobbled the regulated market and law enforcement can’t effectively combat the unregulated market.</p> <p>A top reason why NJ is such a strong, vibrant legal market (vs even NY), is because it has the lowest cannabis tax rate in the county. Raising the SEEF tax over 2000% to \$30 an ounce in today’s vote will KILL THAT ADVANTAGE and only empower the illicit market’s growth. I urge you to do what you can to prevent the SEEF tax from increasing to the \$30 per ounce level.</p> <p>Sincerely, Gian Lombardi</p>
Ami Kachalia	10/30/24	<p>*Submitting for 10/30/24 public meeting*</p> <p>Thank you Chair Houenou and members of the Cannabis Regulatory Commission for the opportunity to submit comment regarding the adjustment of the social equity excise fee (SEEF).</p> <p>Founded in 1960, the ACLU of New Jersey is the state’s leading organization</p>

	<p>dedicated to defending and advancing civil rights and liberties. We are a nonprofit, non-partisan organization with more than 40,000 members and donors in New Jersey, and tens of thousands more supporters across the state. We, along with partners, led the campaign to legalize and decriminalize cannabis in New Jersey, with a focus on racial and social justice.</p> <p>A core tenet of our campaign – and of the promises made in the legislation and regulations that followed – was to be reparative given the decades of harm done to Black and Latinx communities targeted for marijuana arrests. Prior to cannabis reform, Black people in New Jersey were 3.5 times more likely to be arrested for marijuana possession than white people, despite similar rates of use. Some counties far exceeded that disparity, with one county’s data showing a disparity of 13.7 times. New Jersey spent millions of dollars each year – \$143 million in 2017 – enforcing marijuana criminalization while simultaneously disinvesting in resources and opportunities that allow communities to thrive.</p> <p>As a result, one of the most important pillars of this work has always been community reinvestment – ensuring that as cannabis is legalized and money flows into state coffers, those most harmed are not left behind. When the New Jersey legalization law was signed in 2021, it promised that a significant portion of cannabis revenue – including 100 percent of the SEEF – would go back to communities across the state. The CRC regulations, adopted in 2022, promised the same.</p> <p>The law and regulations set the SEEF purposefully low at the start in order to allow the new industry to grow, with the promise that a higher fee would be implemented in the future to meet the need for meaningful community reinvestment. In 2024, the SEEF was set at just \$1.24 per ounce, a decrease from the 2023 rate of \$1.52 per ounce. As such, in March 2024, the New Jersey Cannabis Regulatory Commission (CRC) reported that the state’s adult-use cannabis market had achieved \$1.3 billion in cannabis sales from April 2022 to March 2024. During that same period of time, less than \$4 million was raised through the SEEF for community reinvestment.</p> <p>I urge commissioners to adjust the SEEF in accordance with the 2022 regulations that prescribed a SEEF of \$10-60 depending on the average retail cost per ounce of cannabis. In the instance that the average retail cost per ounce of usable cannabis is between \$250-350, the CRC declared that the SEEF shall be set to \$30 per ounce. To do otherwise would leave millions of dollars on the table that should be invested back into Black and Latinx communities that have borne the brunt of the drug war. Ignoring the law’s promise would also set a precedent for future CRC commissioners and elected officials to disregard the reparative goals of cannabis legalization.</p> <p>This moment calls for action and leadership. New Jersey can lead the way in making sure that the communities most harmed by marijuana</p>
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		<p>criminalization do not get left behind. I urge you to work with your colleagues to increase the SEEF and to ensure that New Jersey lives up to its promise of fair and equitable cannabis legalization.</p>
<p>Wilbur Hancock</p>	<p>10/30/24</p>	<p>What will keep the Standard business from dominating the micro business in distribution and delivery? How will a Micro-Business get a fair share of Business if a well known Standard Distribution or Delivery Business is allowed to come into the state? I want to open a Micro-Business for Distribution and Delivery. I want to make sure the government have rules in place that the little man will be able to keep their business afloat.</p>
<p>Michael Brennan</p>	<p>10/30/24</p>	<p>The Meeting date is October 30, 2024!</p> <p>The lack of provisions for institutional caregivers in New Jersey’s medical cannabis program must be addressed. Since the 2022 legislation, between 2,000 to 3,000 patients have left the NJ Medical Cannabis Program (NJMCP) each month. Patients have also faced some of the highest medical cannabis costs in North America over the past decade, further contributing to the decline in enrollment. Another key factor is the absence of institutional caregivers, which has resulted in patients being denied access to medicinal cannabis upon admission to hospitals, rehabilitation centers, and healthcare facilities. This unacceptable practice must end to ensure patients continue receiving the treatment they need.</p> <p>Ironically, New Jersey’s legislation grants unlimited access to medical cannabis for terminally ill patients, yet these same patients are often denied that access when admitted to healthcare facilities for treatment. This contradiction undermines the intent of the law and jeopardizes the care of patients who rely on cannabis as part of their treatment plan.</p> <p>I appreciate the efforts of the Permitting and Licensing Committee of the New Jersey Cannabis Regulatory Commission in advancing discussions on institutional caregivers. However, it is crucial to move forward with policy development without waiting for perceived legal barriers to be resolved. For nearly a decade, the Justice Department has been prohibited by a congressional appropriations rider from interfering with state-legal medical marijuana programs, so no insurmountable legal obstacles are preventing the implementation of institutional caregivers. Developing these policies and engaging stakeholders now is essential to prepare for smooth implementation.</p> <p>Institutional caregivers will provide critical support by administering medical cannabis, as recommended by licensed physicians, to patients within hospitals, rehabilitation centers, and other healthcare settings. These medications, legally obtained from New Jersey’s Alternative Treatment Centers, must be part of patient care—denying access places healthcare facilities at risk of non-compliance with the law. Proactive policy development is essential, including documentation of medical cannabis use in patient records and integration into Patient Care Plans.</p> <p>The steady decline in enrollment in the NJMCP—especially among some of</p>

		<p>the state’s most vulnerable patients, who are denied access while in healthcare facilities—makes action even more urgent. Institutional caregivers will not only expand patient access but also strengthen the success of the program, improving outcomes for many New Jersey residents who rely on medicinal cannabis for their well-being.</p> <p>Gratefully submitted,</p> <p>Mike</p> <p>Michael Brennan, Patient Advocate, Board Member, Coalition for Medical Marijuana--New Jersey, Inc.</p>
Ken Wolski	10/30/24	<p>I am glad to hear that the Permitting and Licensing Committee of New Jersey’s Cannabis Regulatory Commission is leading policy discussions on implementing Institutional Caregivers.</p> <p>However, I disagree that legal issues need to be resolved before further steps are taken.</p> <p>Institutional Caregiver policy development and stakeholder engagement should currently be in process in anticipation of the resolution of legal concerns.</p> <p>The Justice Department and its component agencies have been barred from interfering in state-legal medical marijuana programs under a congressional appropriations rider that’s been annually renewed for a decade. There are no legal issues that will not be overcome to permit Institutional Caregivers in healthcare facilities.</p> <p>institutional Caregivers will be allowed to come into healthcare facilities and administer to patients the medicinal cannabis that has been recommended for them by licensed physicians, and which was purchased from Alternative Treatment Centers in New Jersey.</p> <p>This will be the law in New Jersey. For healthcare facilities to forbid implementation of Institutional Caregivers will place them out of compliance with the law, needlessly jeopardizing the health and safety of patients who are in their care.</p> <p>Policy development among healthcare facilities should be on-going. These policies must include documentation of medicinal cannabis that is administered to the patient, along with the inclusion on the Patient Care Plan of the patient’s status in the Medicinal Cannabis Program (MCP).</p> <p>The population of patients in the state’s MCP is continually diminishing. This is partly because some of the sickest patients in the state--those currently in healthcare facilities-- are not allowed access to medical</p>

		<p>cannabis.</p> <p>Institutional Caregivers will greatly expand the number of patients served, greatly expand the success of this program, and greatly improve patient care.</p>
Michael Brennan	10/30/24	<p>By Michael Brennan, Patient Advocate, Board Member, Coalition for Medical Marijuana-New Jersey, Inc. a 501(c)3 Nonprofit organization</p> <p>The New Jersey Medicinal Cannabis Program (NJMCP) has made critical strides in improving access to safe, regulated cannabis for patients seeking relief from debilitating medical conditions. However, as the landscape evolves, it is essential to protect the interests of patients to ensure their continued access to affordable, high-quality medicine. The proposed increase in the Social Equity Excise Fee (SEEF) poses significant challenges to businesses and NJMCP patients, who rely on stable pricing to manage their healthcare needs.</p> <p>At the Coalition for Medical Marijuana New Jersey (CMMNJ), we are committed to advocating for the well-being of medical cannabis patients. To that end, we believe:</p> <p>1. Access and Affordability Must Be Protected:</p> <p>Any drastic increase in the SEEF will likely raise prices across the board, including within the medicinal market. Many patients are already managing complex health conditions on tight budgets. Increasing costs could force them to seek unsafe, unregulated alternatives or reduce their usage, compromising their care. CMMNJ urges policymakers to prioritize patient access by minimizing disruptions to the pricing structure in the medical market.</p> <p>2. Informed Policy Decisions Are Essential:</p> <p>CMMNJ supports a careful, data-driven approach to cannabis regulation that weighs the needs of patients, businesses, and social equity goals. We encourage the Cannabis Regulatory Commission to engage in meaningful dialogue with patient advocates, healthcare professionals, and industry stakeholders before enacting policies that could negatively impact access.</p> <p>3. Collaboration for Social Equity and Patient Advocacy:</p> <p>As a nonprofit organization focused on patient advocacy, CMMNJ is ready to partner with the Commission and other stakeholders to help design sustainable policies supporting medical patients and social equity goals. This includes participating in public hearings, providing feedback on</p>

	<p>regulatory proposals, and working directly with affected patient communities.</p> <p>4. Transparency in the Use of SEEF Funds:</p> <p>CMMNJ believes that any funds generated from SEEF must be allocated transparently, with clear plans that benefit social equity initiatives and patient services. Ensuring accountability in how these funds are spent will build trust within the cannabis community and help sustain the progress achieved thus far.</p> <p>CMMNJ stands in solidarity with NJMCP patients and advocates for policies that protect access, affordability, and patient care. We look forward to collaborating with the Cannabis Regulatory Commission and other stakeholders to build a balanced cannabis market that prioritizes health and equity for all.</p> <p>Thank you,</p> <p>Mike Brennan</p> <p>Michael Brennan, Patient Advocate, Board Member Coalition for Medical Marijuana--New Jersey, Inc. www.cmmnj.org</p>
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