



MEMORANDUM

TO: CANNABIS REGULATORY COMMISSION BOARD
FROM: CHRISTOPHER RIGGS, ACTING EXECUTIVE DIRECTOR
SUBJECT: REGULATION WAIVER REQUESTS
DATE: APRIL 3, 2025

BACKGROUND: Over the course of the prior months, adult use licensees and medicinal operators have submitted requests for the Commission to waive specific regulations. This memorandum will outline those specific requests, and will also provide recommendations.

AUTHORITY: Pursuant to N.J.A.C. 17:30-3.7(a), The Commission, in accordance with the general purposes and intent of the Act and this chapter, may waive a regulatory requirement regarding the operations of a cannabis business, to the extent such waiver does not conflict with any other State law, if in the Commission's determination, such a waiver: 1. Is necessary to achieve the purpose of the Act; 2. Is necessary to provide access to cannabis items to consumers; and 3. Does not create a danger to the public health, safety, or welfare.

REQUESTS:

1. Requested Waiver of Retail Storage Requirements under NJAC 17:30-14.7

Docket number WR012 and WR013- Tree House Co-Op Dispensary LLC (WR012) and Green Wellness Haven LLC (WR013) request a waiver of the regulatory requirement that cannabis items be stored in an enclosed indoor locked area where access to such area is limited to individuals authorized under the regulation. Both license holders instead seek the Commission's approval to store cannabis merchandise behind the sales counter. Both license holders assert that the cannabis merchandise will be securely locked behind the sales counter, will only be accessed by authorized staff, and will be transferred to the vault room upon closing. Both license holders argue that allowing cannabis merchandise to be displayed behind the sales counter will streamline the sales process and enhance the customer experience by spending more time engaging with the customer.



RECOMMENDATION FOR WR012 and WR013:

Waiving the retail storage requirements under N.J.A.C. 17:30-14.7 most likely does not meet the second and third factors under N.J.A.C. 17:30-3.7(a), as waiving the requirement would

