

New Jersey Cannabis Regulatory Commission
Public In-Writing Comments
Public Meeting: August 6, 2026

Full Name	Meeting Date	Comment
EDWARD J RICH	8.6.2026	Please point me to the information (I tried searching), but why is it that Liquor stores can have external signage with brand name listed, quantity and prices yet a dispensary cannot. Both products are controlled to age 21+ Thank you in advance
	8.6.2026	I am a New Jersey resident and adult consumer asking the Commission to protect a safe, competitive and accessible regulated cannabis market. I support strict testing, accurate labeling, child-resistant packaging, responsible adult consumption and strong enforcement against impaired driving and sales to minors. However, I oppose arbitrary THC potency caps and excessive per-serving taxes that would raise prices, reduce consumer choice and encourage adults to purchase from unlicensed sellers. Please support policies that preserve access to licensed, laboratory-tested cannabis products, improve affordability, expand independent and locally owned businesses, and allow reasonable personal home cultivation for adults. New Jersey voters chose legalization and regulation. Please continue improving the legal market rather than restricting it until consumers are pushed outside of it.
James DiGiulio	8.6.2026	Dear Chair Laufer: This firm represents Green Analytics East LLC (“GAE”) in connection with the notice of violation (“Notice”) issued by the Cannabis Regulatory Commission (“CRC”) on June 30, 2026. A more fulsome discussion of GAE’s abridged due process rights and its disputes concerning the CRC’s legal and factual bases for the sanctions imposed will be addressed in a forthcoming letter. GAE (i) received no prior notice that the matter would be heard on August 6th, (ii) was not presented with any details concerning the recommended sanctions to be imposed, and (iii) was not afforded the opportunity to address the CRC before a decision was made. This is particularly concerning because GAE presented a comprehensive response to the Notice on July 20, 2026 (“July 20 Letter”), which remains unanswered. The colloquy at the Public Meeting strongly suggests that the July 20

		Letter was not meaningfully considered before sanctions were imposed, despite the CRC’s stated commitment during the same meeting to increase transparency and avoid arbitrary sanctions. GAE has repeatedly sought guidance from the CRC through correspondence dated November 3, 2025, March 24, 2026, and July 20, 2026. These remain unanswered. If transparency and consistency are the CRC’s goals, license holders must be afforded meaningful notice, an opportunity to be heard, and clear regulatory guidance. Following the vote imposing a \$65,000 fine against GAE, the Chair made comments regarding, inter alia, consumer safety. While not directly attributed to GAE, the statements were made following the imposition of the fine against GAE. So the record is clear, GAE notes that none of the alleged violations implicate consumer safety, and the CRC made no finding that any conduct identified in the Notice resulted in harm, risk of harm, or adverse impact to any consumer. GAE intends to pursue all available administrative and legal remedies, including an adjudicatory hearing, because the sanctions imposed are unsupported by the record. For example, GAE was fined \$10,000 for alleged violations of N.J.A.C. 17:30-9.10. As explained in the July 20 Letter, that regulation applies only to a “cannabis business,” which is defined as a cultivator, manufacturer, retailer, wholesaler, distributor, or delivery service. N.J.A.C. 17:30-1.2. Testing laboratories are not mentioned in this regulation, which is separately defined by N.J.A.C. 17:30-1.2. As such, there was no basis to impose sanctions against GAE pursuant to N.J.A.C. 17:30-9.10. Similarly, the CRC found that GAE violated N.J.S.A. 24:6I-19 by utilizing qPCR for microbial testing. However, GAE disclosed its use of qPCR for this purpose and received written approval from a CRC investigator on February 17, 2023, confirming GAE’s compliance with current regulations. GAE reasonably relied upon that approval. Sanctioning GAE for conduct reviewed and expressly approved by the CRC is inconsistent with the Chair’s statement that licensees should listen to their investigators and raises serious due process concerns. Even more troubling is that the investigator’s determination in February 2023 regarding qPCR was consistent with the governing authority. The December 2020 Maryland Technical Authority permits methods approved by the Maryland Medical Cannabis Commission (“MMCC”), which approved qPCR before December 2020. We also understand other laboratories in New Jersey are using qPCR for various purposes. The CRC has not adopted any formal rulemaking prohibiting qPCR or otherwise changing the applicable regulations. GAE has repeatedly requested industry wide guidance to address ambiguities in the laboratory regulations, but those requests have gone unanswered. GAE disputes the enforcement action taken at the Public Meeting and looks forward to addressing these issues through an adjudicatory before the CRC. GAE also remains available to discuss the numerous contradictions and ambiguities that persist in the regulation of this industry.
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Kristen Fowler	8.6.2026	CRC Public Comment August 3rd, 2026 Kristen Fowler Koppert Biological Thank you for the opportunity to submit my public comment. I presented my comment in person back in March of this year, so this is my second submission for 2026. My name is Kristen Fowler, and I work for as a Technical IPM Consultant for Koppert Biological in Pennsylvania, New Jersey, Delaware, and Colorado. A little bit about me, I have two bachelor's degrees in the fields of Biology and Ornamental Horticulture and over 20 years of experience in the industry. For the last 6 years I have worked in the field of IPM for both Cannabis and Ornamental growers. Koppert is a unique company in that we focus on the use of beneficial insects and microbial products to target and treat for insect pests and diseases. We are an international company that works in just about every crop imaginable providing growers with ecological and sustainable solutions. Currently I work with around 20 different cultivators within my territory, with over a dozen of them being in New Jersey. Collectively, I along with my team of associates work with numerous MSOs and locally owned/independent cultivators. Even though I live in Bucks County, PA, New Jersey has become a second home to me with the number of times I cross the Delaware to visit my growers. I am submitting this comment on behalf of those growers who are busy doing the hard work. As you are aware, New Jersey Cannabis cultivators are not allowed to use any EPA registered products/pesticides. All applied products must be in the 25b category. 25b products include mainly products that are oil based, as well as products like citric acid and isopropyl alcohol. These ingredients act as suppressants and work on a contact basis. If certain pests and fungal diseases arise in a crop, NJ Cannabis growers have an extremely limited toolbox to treat for these issues in a curative manner. There are certain pests and diseases that occur in Cannabis that 25b products absolutely do not resolve. They are merely a band aid on the problem. Over the last 5 years we have seen pests like Root Aphids and more importantly Phorodon/Cannabis aphid take hold in facilities and cause extremely damaging results. I personally have seen facilities have to do a full clean out of entire rooms, if not the whole facility, and shut down portions of the cultivation space to quarantine and isolation to prevent the spread of the pests to other areas. When cultivating any crop, nature finds a way. This is not to finger point or to shame anyone, these things simply happen. In the humid wet spring and summer months, diseases like Powdery Mildew can spread through the canopy like wildfire. 25b products merely suppress the fungal

		spores on the leaf surface, but do not treat the root cause of the issue. This can lead to growers having to spray multiple times a week which then leads to other concerns for moisture control in the crop. This also leads to an increase in labor and material costs, not to mention grower burnout of the physicality of it all. Climbing up and down the scaffolding for a two-tiered flower room is not a simple task. Since cannabis is not federally legal and is regulated by the state, every state has their own rules and regulations for cultivation. In recent years, Massachusetts was the only other state that had 25b regulations. Recently they amended their regulations to limited usage of active ingredients for products that are listed for hemp, tobacco, and cannabis in other states. Having to write recommendations for several states, I am often left at a loss when recommending IPM programs for my NJ growers. There are solutions and options available on the market that I simply cannot recommend, but they would solve their problems in an efficient and safe manner. Pennsylvania, which only has medicinal use in the state, allows for chemistries that include biological insecticides and bio-fungicides along with softer (OMRI approved) chemistries to treat
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