

New Jersey Cannabis Regulatory Commission
Public In-Writing Comments
Public Meeting: March 2, 2023

SENDER	DATE	COMMENTS
Amy	1/11/23	Once again, I don't understand why my downgraded, though initially a 2C charge, cannot be expunged by the Governor.
Emmett Sheehan	2/10/23	<p>I noticed some of the math from the February 8 meeting recap PDF contained some rather misleading statistics. First the PDF lists that the National Average # of Licenses per State is 889, but if ONLY California were to be excluded from those calculations, the national average would drop to 458 licenses per state. Exclude both California AND Oregon, and that number drops to 385. California is absolutely skewing this national average that decisions are being based on.</p> <p>Of the 15 states holding licenses as of 2022, 73% of them were below the national average. The only states above the average of 889 were California, Oregon, Washington, and Michigan. Coincidentally, the price of a pound of cannabis in those states has dropped significantly in recent years. compounded with businesses leaving for other states. Why include the national average when there is clearly 1 state that is skewing the data, and 73% of states are below that inflated average?</p> <p>The PDF listed that New Jersey currently has 1 license per 197,000 people. If there are 17 licenses, ($17 * 197,000 = 3,349,000$), thus claiming that the population of New Jersey is 3.3 million people. If someone could provide clarification on this, that would be greatly appreciated.</p> <p>Next, the PDF lists that the National Average # of People per License is 31,000 people. If New Jersey were to make this the goal, the state would only need about 275 licenses which would result in ~32,000 people per license, thus making the comparison of the national average of licenses per state being close to 900 useless.</p> <p>After further investigation, it was found that the listed National Average # of People per License was actually half of the true value. The true national average # of people per license is 65,480. If someone could provide clarification on this, that would be greatly appreciated.</p> <p>All of these inaccurate and biased statistics seem like they are pointed toward convincing the reader that New Jersey is woefully under licensed as compared to other operational states. While I would agree that as of today New Jersey is under licensed, this does not mean that switching to an unlimited license model</p>

		<p>is the proper route. If anyone were to look closer, they would notice that states oversaturated with licenses tend to have much lower prices per pound of cannabis.</p> <p>The markets in California, Oregon, Michigan, and Colorado are already oversaturated and it is not hard to see why. Yet those states are still being included as a part of a model moving forward for New Jersey and in my opinion this is an improper approach. Consumers should not be the only community shareholder considered, but also the cultivators and manufacturers that plan on operating in the state for years to come. If the future landscape is built on a foundation that allows for oversaturation of the market, no need to wonder what may happen. Just look to the west coast and the amount of cannabis operations leaving for "greener pastures".</p>
James Cawley	2/13/23	The cost of cannabis is outrageous. When are we going to legalize homegrow like EVERY OTHER state that has recreational & medical marijuana. This is insane. We are the garden state. Let us grow cannabis
Marcus Colaco	2/13/23	I hope this comment finds you well, I am Marcus Colaco a current medical card holder in New Jersey. The reason for my comment is in the support for homegrow for patients, it is no secret that these big corporations are taking advantage of us patients in the emerging legal market, the large corporations have provided nothing but unfair pricing, inconsistent products and no proper tending to specific medical patients over rec patients. It is evident the corporations are more concerned with the money in their pockets then getting good quality and affordable medicine to patients across the state. That is why we need to put homegrow in place, it will allow for patients to get the proper medicine they need and deserve which is the whole reason they entered the medical marijuana program anyway. Not only will adding homegrow benefit the patients and consumers it will benefit the companies that put out proper quality medicine over bulk quantities for money purposes only.
Lorenzo Tattoli	2/13/23	<p>Why doesn't the NJCRC require Full Panel Testing of THC and CBD in all its forms including but not limited to flower, resin, rosin, shatter, wax, oil, rso, tincture, edibles, ...etc.</p> <p>This testing method ensures that the thc/cbd product is free from any materials that could be and are harmful when consumed, including solvents, heavy metals, pesticides, microbials, mycotoxins, and foreign materials.</p> <p>I highlight resin, rosin, and oils used for vaping because this market is currently saturated with low or no quality products sold at just about every gas station, corner store, and vape shop advertising D8 and CBD products. Fake lab panels are often linked via a QR code on the product and are advertised as safe.</p>
Lorenzo Tattoli	2/13/23	1. What is the CRC doing to get fake thc/cbd vapes and cartridges out of retail stores? A massive state wide issue.

		<p>2. What is the CRC doing to educate consumers at dispensaries about lab testing standards and possible toxins contained in THC / CBD products?</p> <p>3. What advertising claims (I.e. live resin, full spectrum, solvent-less) is the CRC requiring lab testing to verify? Can a product make these claims without lab testing verification in NJ? Why?</p>
Kerry Opperman	2/14/23	<p>Please consider selling these 2 brands of distillate vapes in NJ: Dr Zodiac Moonrock Clear Pura Earth Thank you.</p>
Debra Daro	2/14/23	<p>Need improved ease of access for medical patients; more handicapped parking, seating inside the dispensary for online order pickups, a good curbside pickup program, and ideally a delivery service. I have metastatic cancer (terminal) and I am on supplemental oxygen. As you might imagine I have some difficulty walking anything but very short distances, just getting in and out of the car with my supplemental O2 can be challenging on bad days. I have been to three different dispensaries and have had problems with two of the three. Going to a dispensary for medical patients should feel like going to the pharmacy, not Walmart.</p> <p>I had been using AYR Woodbridge because they do offer a curbside pickup but they have had so many issues with their website and the texting services, I have given up on that dispensary. I would schedule a pickup time and typically had to wait 30-45 mins before it was brought to my car, twice the order was wrong. Recently I was not able to make a purchase online because my account was not working, I went inside and found that they had removed all the seating that was on the medical side. Once inside, there is no place to sit and there is a fair amount of walking from the front door to the counter in the back to make a purchase.</p> <p>Zen Leaf in Elizabeth is a little better although they do not offer curbside pickup or delivery in my area. The handicap parking has been an issue for me in the past. Once inside there is no place to sit.</p> <p>Breakwater is the easiest for me. I have been able to park very close to the door. They do have a couple of chairs by the front door if a person needs to sit for a minute or two before continuing on. The dispensary is rather small which means much less walking to get to the counter. They do not have curbside but I can order online and use the express checkout which involves even less walking. Going to Breakwater feels more like going to a pharmacy but could be greatly improved by doing curbside pickup.</p> <p>Thank you for your time and consideration. Debra Daro</p>

Chuck Salzman	2/22/23	<p>I am writing on behalf of Green Lane Distribution Company, a prospective license holder of Classes 3 and 4 Personal Use Cannabis Licenses. We were pleased to see the adoption of the most recent rules at your February 8th public meeting.</p> <p>We had provided comment on the rules when they were proposed in the fall. At that time, I had noted our request to provide notice of application acceptances for Class 3 and 4 licenses at an upcoming public meeting. I am reiterating that request as we approach the March 2nd public meeting of the CRC.</p> <p>My team and I believe that additional delays in accepting applications for these license types not only threaten the viability of these logistics licenses but also disadvantage upcoming standalone cultivators and manufacturers. These independent license holders may not have the resources or the expertise to support the necessary infrastructure and operations to compete with established vertically integrated operators.</p> <p>We look forward to the opportunity to provide logistics support to the evolving supply chain and to advance the State's goal of building a robust and diverse regulated cannabis industry in New Jersey.</p>
maria whitehead	2/23/23	<p>Not sure if I am doing this correctly but I have a question for the CRC. Who determines where the tax revenue from the sales tax on cannabis goes? Is there a breakdown of where it will go? Will every town in new jersey receive a certain amount of tax money from the sale?</p>
Deedra Brewer	2/27/23	<p>I live next door in a residential neighborhood where my neighbor is applying for a license. Will I be given notice when his application is considered?</p>
Kristofer Marsh, PhD	2/28/23	<p>Hello,</p> <p>I am a representative from Green Scientific Labs and would like to ask the CRC the following:</p> <ol style="list-style-type: none"> 1. Is the CRC any closer to releasing updated testing guidelines for cannabis testing laboratories? We are concerned about the lack of NJ-specific guidelines and hope to see a draft set of rules soon. 2. Has the CRC made any progress on establishing rules for cannabis laboratory quality control/quality assurance programs? 3. It is our understanding that the CRC does not yet have a designated technical expert who will be able to oversee the cannabis testing laboratory program. When will a technical expert be hired? <p>On behalf of Green Scientific Labs, I'd like to thank the CRC for the hard work they continue to put into developing and shaping the NJ state cannabis program.</p> <p>Best regards, Kris</p>

<p>Michael Frederico</p>	<p>3/2/23</p>	<p>I'd like to propose that the commission create a rule stating any company that sells their products under a separate brand must disclose that fact in any advertising and included on the labeling of the packaging, and that the disclosure must be obvious, clearly visible, and recognizable (i.e. not just tucked away in the small print that indicates the manufacturer). I'm proposing this because recently it seems that Curaleaf has done their best to liquidate any remaining Curaleaf-branded flower that they have, while also selling the same exact strains under their new Find and Grassroots brands. They've even marked up the prices on the strains they moved to their Grassroots brand, claiming it's their "premium" line. However, other than Grassroots having vaguely similar branding colors, I've never seen anything that would indicate these brands are actually produced by Curaleaf. They even claim that Grassroots is a completely different company, despite them only having 4 strains, all 4 of which Curaleaf has been selling for years at this point. I'm sure it's stated in the manufacturer's information on the label that it's grown by Curaleaf, but I wouldn't know because I refuse to purchase Curaleaf products any longer. If I'm wrong I'm wrong, but if I'm right, I believe this is an attempt to trick consumers into purchasing their products despite the low opinion many people have of them, and despite the constant stream of ongoing issues that always seems to surround the company, like recalls for mold that scare away more cautious customers or shady financial ties that would make people less likely to want to support them. They previously did the same thing with their vape cartridges and edibles, rebranding those as Select. Speaking of Select, I'd also really like the commission to consider tightening up the regulations on what can be called a live resin cartridge. Both Verano and Select (Curaleaf) sell cartridges labeled live resin that contain distillate. These are not the same product as the various brands of live resin cartridges produced by TerrAscend, and again, I believe this labeling is a direct attempt to trick consumers into purchasing a product that they otherwise would not. I truly hope you take my comments into consideration and do the right thing to protect both patients and adult use consumers from these blatantly deceptive business practices.</p>
<p>Steve Tasca</p>	<p>3/2/23</p>	<p>HOMEGROW HOMEGROW HOMEGROW HOMEGROW HOMEGROW</p>
<p>Sean Mack</p>	<p>3/2/23</p>	<p>Commissioner Barker asked why the number of applicants coming before the Board do not reflect the diversity of our State and the stated goals of the CRC. There are two systemic reasons: (1) 70% of the municipalities opted out of cannabis so there are not enough viable locations available; and (2) there is a lack of access to financial resources.</p> <p>The only way to fix that problem is for the Administration to use its influence/powers to open up more municipalities and to expand grant/loan programs for social equity/diversely owned applicants.</p>

<p>Danielle Lawrence</p>	<p>3/2/23</p>	<p>It's really ashamed, one of your members is on stage upset that there isn't enough minority applicants. At first, I agreed with him. Once the 3 minute public comments started, two women minority owned businesses are still being held up by the state! They are tons of money! No matter how much "assistance" you provide, you still need to provide assistance on GETTING THE BUSINESS DOORS OPEN PERIOD!!!!!! Not only that, after years of wrongful convictions, arrest and fines for non-violent crimes, WHY WOULD THEY TRUST YOU TO GO THROUGH THEM TO OPEN A BUSINESS???? Those two women who spoke are LIVING PROOF THAT YOUR SYSTEM IS STILL NEGATIVELY EFFECTING MINORITIES! History has shown you kicked all of us to the curb, then realized later it was wrong so you came back trying to make things right, then you make them wait and wait and wait and instead of getting their business started, they're stuck in limbo and losing tons of money when they may not ever be able to start a business!</p> <p>And I have to mention about the older gentleman on the board. You should be disgusted with yourself asking the young women to "Speak more slowly, because you are hard of hearing." Well sir how about you retire? You only allow 3 minutes and the woman wanted to get her point across. How dare you say that!!</p> <p>I think it's safe to say the state is doing this WRONG. Please take a look at other states who have completed cannabis correctly aka Colorado!!!!</p> <p>The board members should all consider resigning. You all have done nothing but help the companies with a ton of upfront money. Losers.</p>
<p>Melissa Jackson</p>	<p>3/2/23</p>	<p>I heard today's discussion on lack of minority business. I am minority small business. What I have noticed is that unfairly those who have the money and resources are able to come to town, use those resources to acquire properties and contracts, start working towards establishing and running the business (lease, rent, logos) and the small business needs to afford the cost of getting a license approved before they can move towards leasing, renting or any other business needs. This gives those with money/ connections the ability to be able to still have ways of keeping the little man out or behind. Please discuss way that small businesses that are following the path aren't being squeezed out early. IE 710 Design, they established their location, used their resource to get to a great location before they were licensed. how long before they move from medical to recreational and get ahead of the small business that has to open with lesser money and fewer resources. "It won't be perfect" but do some people still have ways to get around what should be fair in their community.</p>
<p>Nichole Salter</p>	<p>3/2/23</p>	<p>I am the director of Operations at Sriven Laboratories in Bellmawr, NJ. We are the first minority owned cannabis testing lab and are requesting the board</p>

		<p>to increase the minimum 3rd testing requirements for cultivators/manf/etc. Cultivators want to work with us and should be able to without extreme hassle per contracts, etc. Testing is essential, a true differentiator and provides the data necessary to ensure safe, non-contaminated, high quality product(s) to all end users; specifically medical patients who have specific needs.</p> <p>Testing (over time) will also prove that the highest THC product on the market is not the best nor should be the most expensive specifically on medical side. Ultimately, 3rd party testing will provide necessary, transparent data to the state of NJ data which will ensure safety for the public. the bad will be held accountable and the good will continue to thrive and provide as they promise. Thank you.</p>
<p>Sarah Ahrens</p>	<p>3/2/23</p>	<p>Hello,</p> <p>My name is Sarah Ahrens, and I am the founder and CEO of True Labs for Cannabis, Inc., which is the 1st woman-owned cannabis testing lab on the East Coast, the only in New Jersey, and the 2nd in the country with WBENC certification. I am also founded and Chair the Laboratory Testing Committee within the New Jersey CannaBusiness Association (NJCBA LTC).</p> <p>On behalf of the NJCBA LTC, as well as True Labs, I have a few comments for the Commission:</p> <ul style="list-style-type: none"> - We appreciate all the hard work the CRC is doing to stand up the NJ cannabis market, which includes creating NJ-specific testing rules/guidelines. While the initial version of the New Jersey Testing Guidelines was issued in September, and retracted for revisions, we are hopeful to see a new draft set of the revised testing rules soon. - One of the key components of a cannabis testing program is rules for laboratory quality control and quality assurance programs. While we did not see these programs in the initial version of the Testing Guidance, we are hopeful that these very important quality rules will be included in the revised Testing Guidance when it is issued. - Hiring a scientific expert to oversee the NJ cannabis testing laboratory program is crucial to ensuring the program is built on integrity and focused on consumer safety. This individual will be key to understanding, creating, enabling, and continuously executing on a strong laboratory and governance program. <p>Thank you to the CRC for the hard work you continue to put into developing and shaping the NJ state cannabis program.</p> <p>Respectfully, Sarah Ahrens</p>