



To: Lori Ajax, Bureau of Marijuana Control

As a California resident, I support cannabis manufacturers in their efforts to ensure effective regulation that will protect our rights as consumers to retain safe, affordable access to our favorite infused products.

The proposed regulations listed below affect me directly and I support the efforts of manufacturers to formulate alternative rules that will ensure our access to medicine, protect public safety, and preserve a competitive and innovative marketplace.

1. Patients should have access to doses that meet our medical needs.

The proposed regulations ban edible products with more than 10 milligrams of THC per serving, or 100 milligrams of THC per product. As many current patients rely on access to higher potency medications, we need to retain access to these higher-potency medications that have helped Californians meet their medical needs for the last twenty years. This regulation will establish an unfair financial burden on patients and have no meaningful impact on public safety.

2. Patients should have access to a wide range of fresh, edible products that meet food safety standards.

The proposed regulations ban all edible products that require refrigeration and any products containing dairy, meat, and vegetable or fruit-derived juices and extracts. One of the benefits of living in California is access to organic, fresh dietary options. The proposed restrictions would eliminate these healthy options and instead replace them with synthetic, preservative-filled processed foods. We believe that products that can be accurately dosed and produced according to existing food and safety regulations should be allowed in the infused marketplace. Keeping these restrictions in place would eliminate a large number of existing products that have been accessible for years, and severely curtail innovation of new products.

3. Edibles companies should have access to commercial kitchens for shared use.

As in other sectors of food industry, small and medium-sized edibles companies will rely on shared access to commercial kitchen space to stay viable. Access to commercial kitchens is even more important for cannabis businesses, which have to pay an enormous premium on real estate compared to other businesses. The proposed

regulations effectively ban this practices, creating an insurmountable barrier of entry to new and artisan companies) and encouraging monopoly control of the industry. This reduction in competition will result in higher prices and less selection for us as patients.

4. Regulations should minimize unnecessary costs to patients and businesses.

We support strong and sensible regulations that can be shown to protect patients and the public. However, regulations that are unnecessary and burdensome will make medicine unaffordable for patients, shut down small businesses, incentivize the black market, and encourage wasteful and environmentally harmful practices. The proposed rules include expensive and duplicative packaging standards, burdensome testing requirements, and a ban on remediation that will add significant cost to products without benefiting public safety. For instance, under the current rules, any failure of a test will require an entire batch of product to be destroyed – even if the test failure was due to too much or too little THC or CBD and could easily be remediated by the manufacturer. In some cases requirements go well beyond the standards required for tobacco, alcohol, or pharmaceutical drugs. Regulators should make sure that all rules are truly necessary to protect the public before making decisions that place additional burdens on patients, small businesses, and the environment.

Other comments:

(print name)

(address)

(Signature and date)

Send to: Lori Ajax, Chief
Bureau of Marijuana Control, Regulations Office
1625 North Market Blvd., Suite S-202 Sacramento, CA 95834