

Silver State Government Relations



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Subject: Will Adler, Silver State Government Relations, comment to NCCR 12.065

To Whom it May Concern:

Post-harvest treatment of cannabis is an everchanging, yet promising, field of growth for many cultivation facilities. Post-harvest treatments include irradiation and sonic treatment, as well as the handling and packaging of the cultivated products into their proper lots prior to cannabis testing. In Nevada, there is a need for more language around the post-harvest treatment of cannabis, the equipment used to do so, and the effects of the post-treatment on the cannabis. This equipment has a place in remediating cannabis of minor to moderate microbial outbreaks a harvest may experience

Having said that, it is not unreasonable to ask that cannabis which has been treated with one of these post-harvest machines be labeled as such to indicate to patients and consumers it required some sort of secondary treatment prior to sale. If one does not do that, the Cannabis Compliance Board (CCB) is not doing its best to inform consumers of the quality of the product in the cannabis market. At this time, it would be reasonable to have all products which required secondary treatment to provide some notification to the consumer. It may not be the radura symbol nor the language currently required by NCCR, but possibly some symbol the CCB develops to indicate a needed post-harvest treatment on that flower.

Additionally, if this equipment is allowed to be used by cultivators in the normal growth and production cycle, that equipment should be available for the same cultivator to use in whatever means they see fit. This includes the possible use of any of these machines to toll or treat products from another cultivation facility. This would be similar to how cultivators sell previously failed product for remediation to a production company. The ability to toll or use these machines to treat another facility's products would broaden the availability to secondary treatment to more than the cultivations who can "afford" the latest in post-harvest treatment but, rather, have available to anybody who wishes to pay for the service.

Respectfully,

Will Adler