

THC NEVADA, LLC

d/b/a



FLORAVEGA

CERTIFIED PURE, ABSOLUTE EXCELLENCE

— **EST. 2014** —

Who we are:

- 100% Locally Owned Cultivation Business
- 45,000 SF Indoor Facility in City of North LV
 - Growing 10-20 strains at any given time
 - Been in Operation since 2015



Due to the size of the facility and our processes chosen, FloraVega harvests each week

FloraVega expects to conduct an average of forty (40) laboratory tests each week or about 170 tests per month in 2021

Nevada Cannabis Compliance Regulation (“NCCR”) 11.075(7)

currently provides in pertinent part:

- “Except as otherwise provided in this subsection, a cannabis cultivation facility or a cannabis production manufacturing facility may submit a request for retesting **of not more than 50 lots or production runs each calendar year. For any subsequent failure of a quality assurance test in a calendar year, the facility shall destroy the lot or the entire production run as applicable . . .**” (emphasis added).

FloraVega submits that there is a more workable alternative to imposing the seemingly arbitrary cap of 50 tests a year that protects the integrity of our highly held state standards for ensuring the safety of our cannabis product

- Notably, FloraVega is a very large cultivation facility. The current 50 cap to tests does not take into account the varying size and yields of harvests of the different cultivation and extraction facilities throughout the state (i.e., FloraVega has the same 50 tests a year cap as a 5,000 SQ/FT facility)
- In FloraVega's case, at 40 tests per week, with the average failure rate of eight-ten (8-10%) of product, theoretically, FloraVega will exhaust the 50-limit cap in 3-4 months, with no adequate remedy

FloraVega is here today to request the CCB consider revising NCCR 11.075(7) such that the fifty (50) limit of retests for the calendar year is removed.

- Petitioner proposes that the Commission amend Regulation 11.075(7) to read as follows:
- ***Except as otherwise provided in this subsection, a cannabis cultivation facility or a cannabis product manufacturing facility may submit multiple requests for retesting. For any failures of quality assurance tests in excess of four (4), the facility shall destroy said lot or the entire production run, as applicable. A lot which only fails a quality assurance test for moisture content must not be counted for the purpose of this subsection.***

With our proposed language, the arbitrary cap to the number of aggregate tests per facility is removed, but a failsafe of having the product destroyed after four (4) retests is in place

Ultimately, the result is the same – any cannabis product sold, MUST pass the requisite tests but the application is more workable to the cultivators.

It is important to understand how testing is conducted to understand why retesting is needed:

Every Lot **MUST BE TESTED**

- NCCR 1.125 as
 1. The flowers from one or more cannabis plants of the same batch, in a quantity that weighs 5 pounds (2,268 grams) or less;
 2. The leaves or other plant matter from one or more cannabis plants of the same batch, other than full female flowers, in a quantity that weighs 15 pounds (6,804 grams) or less; or
 3. The wet flower, leaves or other plant matter from one or more cannabis plants of the same batch used only for extraction, in a quantity that weighs 125 pounds (56,700 grams) or less within 2 hours of harvest.

FloraVega is committed to continuing to ensure the safety of our cannabis product sold within the state

- Open to suggestions and/or modifications to our proposal, but a more workable and rationally related regulation is needed to protect our cultivators and ultimate consumers, whom serve as the foundation of the cannabis industry.
- We submit that the original, and well-intentioned cap to the tests is not now practicable due to the size and complexity of the cultivation and production business' and needs to be modified.
- As the gold standard in the nation, cultivators must respect regulation and integrity of the product such that the amendments as proposed will not in any manner degrade the integrity or safety of the product.



*Thank you for
your time
and
consideration*