



October 25, 2021

Cannabis Compliance Board
555 E. Washington Avenue, Suite 4200
Las Vegas, NV 89101

Subject: Comment on Proposed Changes to NCCR

Dear Members of the Cannabis Compliance Board and Director Klimas,

On behalf of the Nevada Dispensary Association, thank you for considering our written comments regarding the proposed changes to the Nevada Cannabis Compliance Regulations. We appreciate the revisions proposed by the Board and believe that they help clarify many of the regulations.

NCCR 12.035-12.045

These revisions will go a long way toward streamlining the labeling process and moving away from bulky labels affixed to products at the point of sale. Additionally, the revisions clearly allow for facilities to avoid duplication where the necessary information is already included on the container or package.

Member Durrett requested the industry comment on which dates might be deleted from the labels, and the input we received echoes the changes staff have recommended (removing the testing and packaging dates and limiting the best by date to edible products). For the sake of clarity, we would suggest adding “(for edibles only)” to the sample label required by 12.045 in order to match NCCR 12.045(g) as well as the labeling requirements of production facilities. Again, this is not a substantive change, just a recommended formatting edit to make the sample label in the regulations match the written requirement in NCCR 12.045(g).

We appreciate the Board’s continuous efforts to re-examine the regulations and to seek stakeholder input on proposed revisions. Thank you for considering these written comments.

Respectfully,

A handwritten signature in black ink, appearing to read "L. Martin".

Layke Martin, Esq.
Executive Director
Nevada Dispensary Association

From: Benjamin Chew <Ben.Chew@dblabslv.com>
Sent: Monday, October 25, 2021 5:34 PM
To: CCB Regulations
Subject: Public comment for proposed changes to Regulation 1.081 for October 26, 2021 meeting

CCB

I would like to make a comment regarding proposed changes to 1.081. I am not planning to be present at the meeting to present this orally.

1.081 "Derived" defined. For purposes of NRS 678A.xxx, "derived" means obtained directly from a plant of the genus Cannabis as used in the definitions of cannabis in NRS 678A or hemp in NRS 557, whether naturally or through an extraction process approved by the Board. This does not prohibit decarboxylation of THCA.

I believe the point of the exclusion of decarboxylation is to account for the fact that this is common practice to make THC products. Please remember that all decarboxylation steps will likely convert all acid species to the neutrals. So, CBDA converts to CBD at the same time that THCA converts to THC and the regulations do mention hemp.

It may be better to expand the definition to include all acid species. Otherwise, it may inadvertently prohibit more than what was intended as there will often be minor acid species present in the plant. I would propose a change in the language to:

"...This does not prohibit decarboxylation of the naturally present acid species, including, but not limited to, THCA, CBDA, etc."

"Naturally present" might help narrow down what you are trying to regulate, but that is admittedly a rather vague term, and there may be alternate ways to distinguish this.

Ben

--

Benjamin G.M. Chew, Ph.D.
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From: Curtis Bunce <Curtis.Bunce@dblabslv.com>
Sent: Monday, October 25, 2021 9:13 PM
To: Benjamin Chew
Cc: CCB Regulations
Subject: Re: Public comment for proposed changes to Regulation 1.081 for October 26, 2021 meeting

I agree with this...because it is less restrictive.

On Mon, Oct 25, 2021 at 5:33 PM Benjamin Chew <Ben.Chew@dblabslv.com> wrote:
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Sincerely,

Curtis Bunce



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