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**From:** A C <[REDACTED]@gmail.com>  
**Sent:** Friday, August 5, 2022 4:55 PM  
**To:** CCB Regulations  
**Subject:** Nccr 12.065 label verbiage

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To whom it may concern,

As profound and important this message may seem it also portrays alot of negative impact to the producers that use approved methods, and have no need to divulge this information to the public in the past. This could present an overwhelming misunderstanding to the customer of why or what these methods actually entail and that they are in fact safe, brings more possible confusion and lack of confidence to the customer.

I would suggest the verbiage be left off unless it has been remediation and undergone secondary testing, and state just that in itself, " this product has undergone secondary testing and or may have been remediated by approved state method" .

Thanks for your consideration

A

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**From:** Kay C <[REDACTED]@gmail.com>  
**Sent:** Friday, August 5, 2022 5:20 PM  
**To:** CCB Regulations  
**Subject:** 12.065 Cannabis treatment Public Comment

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Being that cannabis can grow microbes and bacteria after the material is tested, which is why most facilities test before curing because of this, it is reasonable to assume that all cannabis should be treated with an effective method of treatment before being tested and sold to a consumer. Effective treatments kill the DNA of microbes and bacteria and more importantly, keep them from generating later, while also maintaining the integrity of the DNA that is no longer alive being the cannabis.

By virtue of the logic above, this removes the need to specify treatment as it is an industry standard for safety, being that the state considers microbes and bacteria unsafe for human consumption.

The fact that there is any grey area on the subject of remediation/treatment is a glaring inconsistency considering the states stringent testing and thresholds for such contaminants.

It is important to note for the public: cannabis labs only test .44% of a usable lot of flower to consider microbial and bacterial quantities in the cannabis lot. With that being said, results related to testing are highly inconsistent and at times anomalous. No two nugs of cannabis are the same, nor will they ever be the same.

We are stigmatizing something that should be an industry standard.

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**From:** Adam Gersh <[REDACTED]@gmail.com>  
**Sent:** Friday, August 5, 2022 5:29 PM  
**To:** CCB Regulations  
**Subject:** NCCR 12.065 Label Input.

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To the CCB,

My name is Adam Gersh, I have worked as a designer in the cannabis industry since 2018 in CO and NV. I have worked directly in packaging and labeling for the industry since 2020.

My input, and request, is that the newly required information be printed on EXISTING labels, instead of creating a new, separate label.

NV regulations create extreme amounts of waste due to all of the required labels and packaging: up to 4 labels can end up on a single product by the time it reaches the customer. All of the jars, bags, label, label backing, and receipt paper go directly from consumer to the landfill.

As a "green industry" we should be more mindful of our environmental impact.

I would be happy to discuss this point further, if necessary, at your convenience.  
I appreciate the opportunity to voice our opinions.

Best regards,  
-Adam Gersh

---

**From:** Accuracy Legal & Financial Language Services <[REDACTED]@gmail.com>  
**Sent:** Saturday, August 6, 2022 8:11 AM  
**To:** CCB Regulations  
**Subject:** Re: NCCR 12.065 Input

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello NCCB,

Noting that ionizing radiation can also be called a "thermal process" or "cold pasteurization", and noting

"other processes" (the catch-all) may be defined by industry in less industrially onerous manners, one can easily argue those using "ionizing radiation" are inherently at a disadvantage to other (more consumer dangerous) processes which due to their accepted naming do not present immediate consumer reticence.

One could state: (less industry friendly)

**12.065 Cannabis treatment.** *If any cannabis or cannabis product has been treated with any thermal process, ionizing radiation, chemical, or other processes approved by the Board or Board Agent for the purpose of reducing or eradicating microbial contamination at any time postharvest, the label must include the method of treatment and the following statement: "This product has undergone treatment using [method of treatment]" in bold lettering, whereby any process listed in this subsection must be expressed in the statement, as listed, e.g. "This product has undergone treatment using [ionizing radiation]."*

*or more industry friendly.*

**" 12.065 Cannabis treatment.** *If any cannabis or cannabis product has been treated with any thermal process, ionizing radiation, chemical, or other processes approved by the Board or Board Agent for the purpose of reducing or eradicating microbial contamination at any time postharvest, the label must include the method of treatment and the following statement: "This product has undergone treatment using [method of treatment]" in bold lettering, whereby any listed process must be expressed in the statement, as listed, e.g. "This product has undergone treatment using [cold pasteurization]."*

*Of course, there are numerous process included in "other processes" and numerous processes, which are considered "thermal process" or "chemical process", where each of them in name alone possess less or more of an disadvantage to the respective flower, product producer etc.*

*- Ultimately, irrespective of whether the Board allows companies to use less or more industrially onerous descriptions for the "processes approved by the Board or Board Agent," a list of those processes, as well as Board approved synonyms for the processes, should be created, and linked, as possible through a QR code, or QR code specific to the process, thus giving,*

*"This product has undergone treatment using [whatever process]. QR CODE"*

*or*

**" 2.065 Cannabis treatment.** *If any cannabis or cannabis product has been treated with any thermal process, ionizing radiation, chemical, or other processes approved by the Board or Board Agent for the purpose of reducing or*

eradicating microbial contamination at any time post-harvest, the label must include the method of treatment and the following statement: "This product has undergone treatment using [method of treatment]" in bold lettering, whereby any process listed in the [List of approved processes] must be expressed in the statement, as that process or a Board recognized synonym thereof (see List), e.g. "This product has undergone treatment using [cold pasteurization]."

This should prevent the run-arounds that industry will naturally attempt, as e.g. "ionizing radiation" sounds scary as hell, but ultimately places the industry in the best position for international expansion.

I will be in Reno on August 22 and 23rd and Sept 6 - 9, and as available and interested in meeting with an NCCB representative at that time. (+49 [REDACTED], whatsapp)

I humbly submit these suggestions for consideration and am always available for discussion.

Wishing you all a great summer,

**Richard Clabaugh**

Richard Clabaugh, JD (OR), LLM (DÜ), esq.\*

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\*admitted to practice law in the State of Oregon, USA

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On Sat, Aug 6, 2022 at 1:45 AM Nevada Cannabis Compliance Board <[ccb-noreply@ccb.nv.gov](mailto:ccb-noreply@ccb.nv.gov)> wrote:



## NCCR 12.065 Input

August 5, 2022

At the July 26, 2022 board meeting, the Nevada Cannabis Compliance Board (CCB) considered the following proposed language for Nevada Cannabis Compliance Regulation (NCCR) 12.065 which states:

**12.065 Cannabis treatment.** If any cannabis or cannabis product has been treated with any thermal process, ionizing radiation, chemical, or other processes approved by the Board or Board Agent for the

*purpose of reducing or eradicating microbial contamination at any time postharvest, the label must include the method of treatment and the following statement: "This product has undergone treatment using [method of treatment]" in bold lettering.*

As NCCR 12.065 remains under review, the CCB is requesting public input on any suggested changes or additions to the proposed language for the **label**. Please submit any recommendations regarding language for the label to [regulations@ccb.nv.gov](mailto:regulations@ccb.nv.gov) no later than **August 19, 2022**.

As a reminder, the requisite labeling pursuant to NCCR 12.065 is still not required during this review process.

## Nevada Cannabis Compliance Board

### Carson City Office Location:

1550 College Parkway, Suite 142  
Carson City, NV 89706

### Las Vegas Office Location:

700 East Warm Springs Road, Suite 100  
Las Vegas, NV 89119



Nevada Cannabis Compliance Board | 555 E. Washington Ave., Suite 4200, Las Vegas, NV  
89101

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Sent by [ccb-noreply@ccb.nv.gov](mailto:ccb-noreply@ccb.nv.gov)

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**From:** Phillip Wrightson <[REDACTED]@gmail.com>  
**Sent:** Sunday, August 7, 2022 8:45 PM  
**To:** CCB Regulations  
**Subject:** Radiation on labels

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi there!

Just chiming in with my opinion on rad source, and radiation treatments for cannabis. Radiation treatments are beneficial for a cannabis business as they assist in passing Lab tests on the product that would normally would have failed! So at the moment, even if a batch has passed testing as untreated cannabis, but it's been exposed to radiation and it's being told to us that it's still just as good for medical patients. That's great, but shouldn't it be our right as patients to see and know how our medicine was made? Especially if it's not an industry standard, and there are companies who can grow and distribute product without radiation.

Seeing the radiation treated product label on every compliance sticker can give patients a lot of comfort knowing that their health is really being thought of when these decisions are being made behind closed doors. And that they have the choice and knowledge necessary on what goes into their daily consumed medicinal cannabis.

I feel that it is the duty and should be one of the purposes of the Cannabis Compliance Board. Help keep us informed and safe!

Thank you for your time,  
Phillip Wrightson

[REDACTED]

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**From:** Benjamin Lerner <[REDACTED]@mac.com>  
**Sent:** Monday, August 8, 2022 6:33 AM  
**To:** CCB Regulations  
**Subject:** Disclosure of radiation

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,

It has come to my attention some flower being sold in Nevada by Flower One and other cultivators, using radiation to kill microbes and other contamination.

As a consumer, I have a right to know if radiation has been used on cannabis. I hope you will consider my email and force all cultivators to label their products as such.

This is a consumer protection issue!

Regards,

Benjamin Lerner

[REDACTED]  
[REDACTED]  
[REDACTED]@mac.com



---

**From:** [REDACTED]@yahoo.com  
**Sent:** Monday, August 8, 2022 9:30 AM  
**To:** CCB Regulations  
**Subject:** Treatment

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good morning,

I do not think BOLD lettering is enough. I feel it should have to be put on the jar as a Colored sticker. Companies will put it on their thermal labels and will not be noticeable to the customer. Maybe dispensaries should be required to let the customer know. Everyone should know if they are consuming something that has been treated with radiation. Just my opinion.

Thank you.

---

**From:** Jillian Nelson <[REDACTED]@evergreenorganix.com>  
**Sent:** Monday, August 8, 2022 11:35 AM  
**To:** CCB Regulations  
**Subject:** FW: NCCR 12.065 Input

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

First and foremost, I would like to express that I am in full support of the intention behind this regulation. Cultivators should be required to disclose if the cannabis they are selling has been remediated and the process by which it was treated. It is important that consumers have access to this information in order for them to make informed decisions regarding the cannabis they purchase and ultimately consume.

That being said, I believe there is some need for additional context regarding this regulation and would like to provide the following points:

Concentrated cannabis products that are extracted from cannabis that has been remediated according to the proposed law should be required to disclose such information. For instance, if a cannabis extract was derived from flower that was irradiated prior to extraction, this should be disclosed on the product label in addition to the method of extraction.

Edible cannabis products should be excluded from this regulation or additional clarification should be provided. Based on the current wording, any edible that requires baking or cooking to minimum food safety temperatures would technically undergo a thermal process according to this regulation. While not the intent, the language could be interpreted in a way in that an edible cannabis product (ie: a brownie) that contains TCS ingredients (ie: eggs) that requires thermal processing for the sake of food safety (ie: baking) must have a disclosure of this processing on their label.

Lastly, I would like to suggest that NCCR 12.065 be amended into two parts as follows:

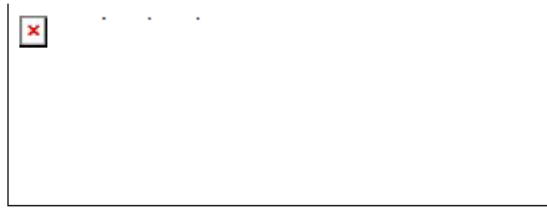
**12.065 Cannabis treatment.**

- (1) If any cannabis or cannabis ~~product~~ extract has been treated with any thermal process, ionizing radiation, chemical, or other processes approved by the Board or Board Agent for the purpose of reducing or eradicating microbial contamination at any time postharvest, the label must include the method of treatment and the following statement: "This product has undergone treatment using [method of treatment]" in bold lettering.*
- (2) If a cannabis extract was derived from cannabis that was underwent treatment as outlined above, the label must include the method of treatment and the following statement: "This product was extracted from cannabis that has undergone treatment using [method of treatment]" in bold lettering.*

Thank you for your consideration.

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**From:** Nevada Cannabis Compliance Board <ccb-noreply@ccb.nv.gov>  
**Sent:** Friday, August 5, 2022 4:45 PM  
**To:** Jillian Nelson <[REDACTED]@evergreenorganix.com>  
**Subject:** NCCR 12.065 Input



## NCCR 12.065 Input

August 5, 2022

At the July 26, 2022 board meeting, the Nevada Cannabis Compliance Board (CCB) considered the following proposed language for Nevada Cannabis Compliance Regulation (NCCR) 12.065 which states:

**12.065 Cannabis treatment.** *If any cannabis or cannabis product has been treated with any thermal process, ionizing radiation, chemical, or other processes approved by the Board or Board Agent for the purpose of reducing or eradicating microbial contamination at any time postharvest, the label must include the method of treatment and the following statement: "This product has undergone treatment using [method of treatment]" in bold lettering.*

As NCCR 12.065 remains under review, the CCB is requesting public input on any suggested changes or additions to the proposed language for the **label**. Please submit any recommendations regarding language for the label to [regulations@ccb.nv.gov](mailto:regulations@ccb.nv.gov) no later than **August 19, 2022**.

As a reminder, the requisite labeling pursuant to NCCR 12.065 is still not required during this review process.

## Nevada Cannabis Compliance Board

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Nevada Cannabis Compliance Board | 555 E. Washington Ave., Suite 4200, Las Vegas, NV 89101

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**From:** Eric pittenger <[REDACTED]@yahoo.com>  
**Sent:** Monday, August 8, 2022 11:49 AM  
**To:** CCB Regulations  
**Subject:** Radiated cannabis

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I have been actively involved in the legalization of cannabis here in Nevada since 1995 and I am writing you a quick letter of concern over the practice of using radiation. Simply put, I want to know if the cannabis I am going to consume radiated and I want it disclosed on the package and in bold print specifically so cultivations cannot hide it. If it's of no concern, then why are they going to great lengths to not disclose it?

Thank you  
Eric Pittenger  
[REDACTED]

Sent from my iPhone

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**From:** Camille Gross <[REDACTED]@gmail.com>  
**Sent:** Monday, August 8, 2022 3:15 PM  
**To:** CCB Regulations  
**Subject:** Radiation treatment disclosure

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,

I am a concerned citizen emailing to say that radiation treatment and all treatments of the cannabis plant should absolutely be disclosed on every label and product in this industry. That is how we keep citizens safe. We have a right to know what we are consuming. Furthermore, if any person is harmed by this, there will be evidence, accountability and justice for victims. We know radiation is harmful and can linger for decades. Please do the right thing.

Camille

--

Thank you,  
Camille Gross

---

**From:** Shane Terry <[REDACTED]@taprootbrands.com>  
**Sent:** Monday, August 15, 2022 8:27 AM  
**To:** CCB Regulations  
**Cc:** Carina Robinson  
**Subject:** Public Comment on NCCR 12.065

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good morning,

On behalf of TapRoot (a vertically integrated licensee), I wanted to submit our public input for the discussion about NCCR 12.065.

We fully support the CCB's mandate to incorporate the notice language as is included in the current regulation.

Furthermore, we would like to ensure that this disclosure is required on ALL cannabis packaging whether transferred to retail or any other licensee. Additionally I would like to see this as a mandatory disclosure on any COA that accompanies a testing lot.

As a production licensee who primarily purchases biomass from other cultivators instead of our own operation, I think it is imperative that this notice is disclosed up front where a potential purchaser of irradiated biomass would have the correct information in advance of making a purchase decision.


I know that we strive to produce the highest quality of cannabis that will end up as infused products, and if it was known to us we would avoid extracting irradiated product that we would eventually sell to our customers.

My concern about only putting it on the label and not disclosing it upfront on the COA is that purchasing decisions are often made solely by reviewing a COA, and a production facility that gets "surprised" when they notice this on a label post-delivery may not have any option but to continue to include it into the production process.

Although the health effects of consuming this material (which theoretically could be concentrated further through extraction) are not conclusive, in the past we have noticed irregularities in the COAs from irradiated material, specifically when we see a higher concentration of Delta 9 and Delta 8 THC that has converted from THC(A). On a few occasions where this was noticed, the cultivator admitted that the material was irradiated however nothing other than our analysis would have created the proper awareness.

So to summarize, **we propose to retain the current language but in addition require the notice to be added to all COAs of irradiated material** so there is full transparency throughout the supply chain and ultimately with the product that will end up getting consumed by our retail customers.

Thank you for your consideration.

**Shane Terry** | CEO  
TapRoot Brands  
m. 702.858.[REDACTED] 







Dear CCB,

My name is Evan Marder. I am the president of Fleur Cannabis, Evergreen Organix and Ego Brands. Fleur Cannabis is our cultivation brand, Evergreen Organix and Ego Brands are our production brands.

At Fleur Cannabis we employ organic practices and strive to grow clean cannabis that does not require any sort of remediation treatment. Since taking over the cultivation operation in June of 2019, our failure rate has been minimal. In 2020, even with aspergillus being a problematic issue for most cultivators in Nevada, we failed less than 2% of our tests. Prior to 2021 labs were “plating up” and testing to see if aspergillus spores detected on flower were alive or dead. Even when aspergillus was detected on our flower the vast majority of the time the spores were determined to be dead. This led to a passing result.

In 2021 the CCB enforced a rule on all of the state licensed labs that would not allow for the labs to plate up the aspergillus samples. This led to increased failures throughout the state. However, when employing all of our growing methods correctly we still see minimal failures. We have decided as a company that we will never employ the use of remediation considering it is very important to us to provide a very natural, clean product to the consumers who purchase our products in Nevada dispensaries. We find it to be very unfair that companies that do not employ practices necessary to grow contaminant free cannabis are able to sell their products to unknowing consumers who are unaware of the need to remediate these products.

It is my very strong belief that regardless of whether or not any sort of remediation is safe, the consumer has the right to know that the cannabis they are purchasing was at one point contaminated and had to go through a remediation process to pass microbial testing. This is only fair for the consumer and only fair for the cultivators who have spent the money to create clean room environments that aren't susceptible to mold and pathogen issues, and who also implement the proper integrated pest management procedures as well as take the time and put in the effort to make sure the cannabis they grow is void of contaminants. A lot of work goes into growing an end product that does not require remediation, but it is without question possible.

Furthermore, the use of radiation is very concerning for many, myself included. Until there are independent studies done that are not paid for by the company making the machinery used to treat cannabis with radiation that prove that something that has been irradiated and then is combusted is safe, I am of the opinion that radiation should be handled differently than other forms of remediation that have already been proven to be safe. I am also of the opinion that there needs to be more studies done to determine the safety of working with or close by irradiation treatment machines, but that is a discussion for another time.

I'd like to add that it is our duty as cultivators to educate the public about how we grow, dry, cure, trim and package our cannabis. I personally do budtender education events very often for the dispensaries



that sell our products. I feel very strongly that it is the responsibility of the cultivators to educate the public about the use of their remediation equipment and all that goes along with it. It is definitely not the responsibility of the CCB to educate the public about the use of remediation equipment. Any argument opposing that just isn't a good faith argument, it is and always has been our responsibility to educate the public about our products and our methods.

As far as the language on the labeling is concerned, I would like to make the following suggestions:

- Reimplement the “\*Notice” at the beginning of the statement so it reads \*Notice: This product has been treated with...
- Reimplement the Radura symbol. The argument that cannabis is a pharmaceutical drug similar to drugs treated with irradiation that don't require the irradiation disclosure is ludicrous. Cannabis is a plant and is sold in plant form. It is much more similar to food, which does require the disclosure of irradiation along with the Radura symbol. I am of the opinion that the Radura symbol should still be required.
- Any cannabis treated with radiation should have a separate label from the mandated state label, otherwise this will not be seen by many consumers. A lot of cultivators use boxes and store their cannabis in a jar inside the box and a lot of times that jar does not have any sort of state mandated label. I feel it is important to make sure this information is obvious to the consumer and a label should be required on the container the cannabis is in, separate from the mandated tracking labels.

Thank you very much for your time and for working so hard on this issue. It is very important to a lot of us in the industry and the community.

Sincerely,

Evan Marder

---

**From:** Canna PsychMd <[REDACTED]@gmail.com>  
**Sent:** Tuesday, August 16, 2022 3:19 PM  
**To:** CCB Regulations  
**Subject:** ref: REGULATION 12.065

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good Afternoon,

It is of immediate concern that it is imperative to the health of consumers that the State of Nevada issue regulations if not completely cease the use of radiation on cannabis flower. These companies are going to face lawsuits in the future just as pursue pharma did. I am very concerned about the potential disease, ailments, and disorders that the radiation of products that consumers are ingesting, may occur. In addition to radiation, there is a current technology being used by nearly half of the cannabis companies in Nevada. This technology is commonly known as "CRC." Color Remediation Column (CRC) is used to remediate the color of cannabis extracts to a more appealing color. A significant portion of legal cannabis companies that are using this process are using failed flower/ trim that cannot be used for "consumption," whether they have mold, pesticides, heavy metals, or other contaminants that are found in their start product. They are using failed products to create extracts via the use of the CRC technology. In addition to this concern, the filters used as a media for the CRC filtering process are known to cause cancer and are deadly. Due to the lack of cannabis research in the United States (due to cannabis being a Schedule I substance) there is not adequate human studied research for the short/ long-term effects that humans will experience via these processes. This raises concern about the damage it will do to the health of its consumers. There are not any current regulations on the use of CRC tech. As patients, consumers, advocates, and industry professionals, we call for immediate attention to the regulation of CRC and any other technology that does not have product safety regulations. I created a petition earlier this year to show you (the State of Nevada), how concerned we are as consumers and cannabis industry professionals. The petition has over a hundred signatures already. The link is provided below.

<https://chnng.it/2Vx65D7ng2>

Please consider implementing the minimum of mandatory labeling products that have used such technologies. In all honesty, these technologies should completely be ceased as they are found to be extremely harmful. Please also consider that if the State of Nevada does not take action on this matter immediately, there is a strong potential for lawsuits following for negligence. These companies care more about profit than the health of the consumers. This should raise serious concern.

--

***My Best,***

***Tee Moreno***

***Cannabis Researcher  
2021 "Educator of the Year" Las Vegas Cannabis Awards  
Columnist for "Vegas Cannabis Magazine"***

---

**From:** Bruce Martin <[REDACTED]@bruceljmartin.com>  
**Sent:** Wednesday, August 17, 2022 3:07 PM  
**To:** CCB Regulations  
**Subject:** 12.065 - Radiation symbols and notice

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Cannabis Control Board Members:

I ask you to make a ruling that will place a "Symbol" and "Wording" on packaging to highlight inferior cannabis products that are irradiated in order to pass qualifications for Human consumption.

Consumers need quality products and are not out to purchase sterilized mold to consume. They want cannabis. Not mold.

Thank you for considering this idea of placing irradiation symbols and wordage warning on packaging to protect Nevada residents and visitors alike from unintentionally purchasing inferior products.

We shouldn't allow sales of cannabis that can't pass Laboratory Testing requirements. Irradiating plants is nothing I support. I support composting diseased plants.

Sincerely,  
Bruce L.J. Martin

Permanently disabled decorated New York State Firefighter-EMT;  
Clark County Democratic Committeeman - Paradise, NV;  
Nevada State Central Committeeman - Paradise, NV;  
Keepers of the Hemp®, Las Vegas, NV - Founder-Owner

---

**From:** rebecca gillen <[REDACTED]@hotmail.com>  
**Sent:** Wednesday, August 17, 2022 5:12 PM  
**To:** CCB Regulations  
**Subject:** Nccr12.065

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good evening ,

I would like to see disclosure on the packaging. I would like it to say :

"This product has undergone treatment using [method of treatment] in bold lettering.

Nevada prides itself on having the highest standards for testing criteria in the marijuana industry. I'm proud of that and would like Nevada to stay the best of the best. Having the knowledge of what the product is coming into contact with every step of the way is so important and it is what makes us the best.

Thank you for your help and your time.

Warm regards,

Rebecca Gillen

Sent from my iPhone

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**From:** Kelbi Thompson <[REDACTED]@gmail.com>  
**Sent:** Thursday, August 18, 2022 8:46 AM  
**To:** CCB Regulations  
**Subject:** Regulation NCCR12.065

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good morning,

My name is Kelbi Thompson and my mother is currently a a registered medical patient in Nevada.

I would like to suggest that the label state the remediation treatment. I would like the language to be big enough to be seen, for example the font size used to state "KEEP OUT OF REACH OF CHILDREN."  
As well as any symbols that may assist the consumer in being aware of the remediation treatment.

I would like to remind the CCB that as a state regulatory body, it is your job to protect the consumer. The consumers are depending on you to disclose any information about what we are utilizing and putting into our bodies.  
It is extremely upsetting to learn that cultivators are already using this remediation method, while there is a law on the books stating that should be disclosed, and it has not been.  
That means consumers have already been using these products unknowingly.

I would also like to remind the CCB to remain objective and neutral by not only referring to research put forth by the company that manufactures remediation equipment. As that would be a conflict of interest.

Respectfully,

Kelbi Thompson

Sent from my iPhone

---

**From:** Karalin Cronkhite  
**Sent:** Friday, August 19, 2022 3:45 PM  
**To:**  
**Subject:** FW: New language

**Kara Cronkhite, REHS, MPH**  
Division Chief- Inspection and Audit  
Nevada Cannabis Compliance Board  
700 E. Warm Springs Rd., Suite 100  
Las Vegas, NV 89119  
E-mail: [REDACTED]@ccb.nv.gov  
Web: <https://ccb.nv.gov>



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**From:** Pejman Bady - Integrity Pros <[REDACTED]@integrity-pros.com>  
**Sent:** Friday, August 19, 2022 3:41 PM  
**To:** Karalin Cronkhite <[REDACTED]@ccb.nv.gov>  
**Subject:** New language

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Hi Kara, hope youre well and happy Friday.

Per our discussions and what was recommend by the board member, I must agree that is a perfect place to detail what has the life time of the plant pre or post harvest would be the soil amendment or the COA. This would give any patient all the information they would need evaluate the quality of the product.

Below is the language that our group would think would be appropriate if it was on the soil amendment.

Thank you. P.



**8.010 Required written disclosure with each lot of usable cannabis; provision of free samples to cannabis sales facility; applicability of provisions governing excise tax on cannabis to free samples.**

1. A cannabis cultivation facility must ***disclose in writing*** with each lot of usable cannabis provided to a cannabis sales facility:

(a) All soil amendments, fertilizers, pesticides, and other crop production aids applied to the growing medium or cannabis plant included in the lot;

(b) If any cannabis or cannabis product has been treated with any thermal process, radiation, chemical, or other processes approved by the Board or Board Agent for the purpose of reducing or eradicating microbial contamination at any time postharvest, the written disclosure must include the method of treatment and the following statement: "**This product has undergone treatment using [method of treatment]**" in bold lettering; and

(c) The name of the cannabis testing facility which performed the required quality assurance tests and the certificate of analysis for the lot.