

Public Comment for CCB Board Meeting 1.24.23

Chairman and Board Members:

Regarding the most recent Public Health & Safety Bulletin on January 19, 2023, it claims Clark Natural Medicinal Solutions, LLC (License #64995797755670122923 and 61301779234796117347) was found to be using an unapproved pesticide, Ethephon.

I would like to bring to your attention that you reference the licensed name and do not include the brand names (DBAs) the company uses to sell their products to the market. When notifying the public of a Health & Safety shouldn't it be easy to identify the product? If I was not in the cannabis industry, I wouldn't know that this is Solaris's brand and The Sanctuary Dispensary's licensed name. The best way to show an example of this is to relate it to a food recall. When Ameripack Foods LLC had a recall on a brownie they listed the brand name, Meal Simple (and a picture of the product) Chocolate Chunk Brownie. Because this is how a customer finds it at the store. It is not labeled Ameripack Foods LLC Chocolate Chunk Brownie.

An excel spreadsheet was provided with a list of products and batch numbers. On the list of Infused Flower & Infused Prerolls the Products all had the brand name (DBAs) attached to the product. Let me show you an example:

Category	Item	Production Batch #
Infused Prerolls PR1LT072222SB	Trendi Love Triangle 2.75g Super Blunt	

However, when you look at the Cannabis Concentrates and Infused Edibles and Tincture lists the brands name is not included with every product just select ones. Here is an example:

Category	Item	Production Batch #
Infused Edible	Peanut Butter Cube 40 mg 4pk	PR1DL110122PBC

These are HaHa brand (DBA) (Plant 13, MM Development Company LLC) Peanut Butter Cubes, but the brand name (DBA) was left off? Why are some brand names (DBA) left off and some are included? HaHa actually has multiple items on this edible list. There are other licensee's that did not have their brand names (DBAs) referenced in any of the lists.

Using the first example, Trendi Love Triangle 2.75g Super Blunt, as a customer and not in the industry, I may not know things like:

- Trendi brand is from Planet 13/Medizin (dba), MM Development Company LLC (licensed name).
- Love Triangle is only grown in Nevada by Green Life Productions.

- Oil made from Solaris (Clark Natural Medicinal Solutions) flower was used to create this infused preroll.

If you truly want to warn the customers and want them to report the product, why not be clear about the license's name and brand names (DBAs)? Going back to the food recall using a picture and providing the label that came on the product (or the detail) would make this much easier. Nevada's cannabis industry is small compared to states like California and Colorado. Nevada is also very strict, and you track everything. With such detailed records the state must have a better way to track and notify the consumer about Health & Safety Bulletins. While a dispensary must send a consumer with multiple labels, it would be absurd to think customers keep all of these like receipts. Unless you are a hoarder you're not going to have the chocolate bar wrappers on hand from the last year and half. However, if you have a profile at the dispensary you purchase from, they can tell you the batch number of the products you purchased there.

Picture above of Trendi 2.75g Super Blunt

The point of bringing this to your attention is because when there is a Health and Safety issue with cannabis products in Nevada it should be easy and clear to identify the products with the issue. That is hard to do when you can't easily find a licensee's brand names (DBAs) or the brand name is not even listed. If you look at the Infused Edibles and Tinctures List, at the second item listed it is 100MG Dark Chocolate Bar. Do you know how many brands have Dark Chocolate Bars on the market? Why do you have to do detective work to figure out the product name and license brand names (DBAs)?

Health and Safety should be of the utmost importance to the cannabis community and the products should be easy to identify. With the information you provided on your website a consumer can easily see what dispensaries sold the products, but you can't easily identify the brands of the products. I ask the board to consider this and challenge you to make this process more consumer friendly. Because at this point, why even bother letting the consumer know they purchased products a year and a half ago (or currently) that were contaminated but no real way to identify those products unless they still have the packaging on hand.

Thank you for allowing me to present this concern to the board.

Amber Jansen