
From: Trevor Morones <tmorones@controlpoint.consulting>
Sent: Tuesday, May 23, 2023 9:52 AM
To: CCB Meetings
Cc: Farrell, James
Subject: Public Comment for June 20

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

REQUEST

Hi CCB,

Thanks for accepting public comments electronically.

My name is Trevor Morones. I am an epileptic adult, product safety systems professional, ASTM International volunteer, and cannabis advocate.

May I have an opportunity to present a comment regarding the 51st D37 Cannabis Standard D8449?

ASTM D37 D8449 - Standard Specification for Label Content and Style, Format, Location, and Prominence of Elements for Consumer Products Containing Cannabinoids.

This new standard (D8449) is the first set of internationally harmonized label content specifications for consumer products containing cannabinoids to be published worldwide.

Practical applications for the standard, including:

- Defining specifications for what can and cannot be classified as a consumer product containing cannabinoids.
- Defining the concept of a declaration of cannabinoids and how to present this information on a label.
- Defining a standard means of verifying cannabinoid content label claims.
- Outlining the specifications for making a cannabinoid dominance claim and how to verify this claim.
- Outlining the specifications for making a cannabinoid ratio claim and how to verify this claim.

I will comment publicly during the next session, June 20th, electronically or in person on ASTM International D37 D8449.

And what questions may I answer for you regarding the comment?

Best,

Trevor J Morones
Founding Partner | Co-CEO

949.290.8660

Control Point
Las Vegas, NV

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[Control Point Play Date](#)

RESET

June 16, 2023

Cannabis Compliance Board
Grant Sawyer Office Building, Suite 4200
555 E. Washington Avenue
Las Vegas, NV 89191

Subject: NCCR 15.055 Ventilation of the cannabis consumption lounge

Dear members of the Cannabis Compliance Board:

On behalf of the RESET management company, thank you for considering our written comments regarding ventilation for consumption lounge regulations. Having met with a number of experts in the HVAC industry and the American Society of Heating, Refrigerating, and Air-Conditioning Engineers ([ASHRAE](#)) professional association, we believe there are options that ensure a safe environment for both guests and employees outside of the original language in NCCR 15.055. Additionally, these recommendations are based around current Federal regulations and the Environmental Protection Agency's National Ambient Air Quality Standards ([NAAQS](#)).

With a focus on providing a number of form factors for cannabis consumption outside of combustibles alone, we believe offering cannabis infused food and drink options will reduce the need for excessive air changes without affecting the comfort of both guests and employees. Therefore we request eliminating the need for a separate smoking area and reducing air changes per hour to 8, aligned with current standards utilized by gaming taverns today by way of AB571 in 2011.

An additional option, in place of required air changes per hour, is utilizing air-scrubbing technology and monitoring air quality per the requirements of NAAQS. Monitoring both CO2 levels and the delivery of outdoor air in *cubic feet per minute per person* (cfm/person) we can deliver a safe and comfortable environment where CO2 levels do not exceed 1200 ppm above ambient. Additionally, the use of In-Room or [In-Duct Air Cleaning Systems](#) allows for power conservation while recirculating cleaned air up to 40 cfm/person, where bars and casinos today are required to maintain 7.5 cfm/person per ASHRAE standards.

Finally, in partnership with the Cannabis Compliance Board, operators would record air-quality data to submit to the CCB on an annual basis to ensure compliance with NAAQS.

Our proposed changes to NCCR 15.055 can be found below:

New
~~Deleted~~

15.055 Ventilation of the cannabis consumption lounge. A ventilation plan must be submitted, approved, with changes as necessary, and fully implemented prior to issuance of a final license. At a minimum, the ventilation plan must include:

1. A ~~separate~~ ventilation system within any designated smoking room capable of ~~30~~ **8** complete air changes per hour at a minimum. Excess air required to create negative pressure volume ~~that~~ must be directly exhausted to the outdoors;
2. ~~A separate system within the rest of the cannabis consumption lounge capable of 20 complete air changes per hour at a minimum that must be directly exhausted to the outdoors;~~
3. The ventilation system within any smoking room must create a negative air pressure within the room;
4. A ~~High-Efficiency Particulate Air (HEPA)~~ Minimum Efficiency Reporting Value (MERV) 14 or higher filtration system, or equivalent system, capable of handling the entire volume of air within any separate room of the lounge;
5. An odor mitigation plan that identifies, at a minimum, the following:
 - (a) The specific odor control equipment to be installed and operated to mitigate odor emissions prior to leaving the building;
 - (b) An engineering assessment approved by a certified professional engineer ensuring the odor control equipment installed and operated will mitigate odor emissions prior to leaving the building; and
 - (c) An operation and maintenance plan showing the monitoring frequency for preventative maintenance, the timely responses to equipment malfunctions and the record keeping and employee training in place to ensure the odor control equipment to be installed and operating is maintained per manufacturer's specifications.
 - (d) Any deviations from the odor mitigation plan or malfunction of equipment must be documented on a log that shall be provided to the Board upon request.
6. If the cannabis consumption lounge plans to use has an outdoor smoking area, the applicant must submit a request to the local jurisdiction and comply with any requirements the local jurisdiction may have regarding an outdoor smoking area.
7. Atmospheric monitoring of the non-smoking room of the cannabis consumption lounge focusing, at a minimum on an 8-hr average and 15 min peak CO₂ and PM 2.5 concentrations which must include an audible and visual notification system, alerting the facility to any failures.
8. Any local jurisdiction requirements. Local jurisdiction requirements can be more restrictive than the NCCRs.

9. As an alternative to sections 1-4 above, a consumption lounge may use ventilation systems that includes an odor containment and elimination device that achieves or exceeds the air quality of systems that meet National Ambient Air Quality Standards (NAAQS) that can include:

- (a) A ventilation system within any designated smoking room capable of 60 cfm/person with a minimum of 1.9 cfm/ft² that must be directly exhausted to the outdoors in place of complete air changes per hour.
- (b) In-Room or In-Duct Air Cleaning Systems that clean the air to meet National Ambient Air Quality Standards and has a Total Volatile Organic Compounds (TVOC) concentration of less than 0.75 ppm. Recirculation or use as Equivalent Outdoor Air (EOA) of up to 40 cfm/person of cleaned air within the smoking room shall be allowed. Ventilation rates shall be such that CO₂ levels do not exceed 1200 ppm above ambient.
- (c) Lounges utilizing this alternative shall submit a yearly report demonstrating that the lounge remains in line with National Air Quality Standards.

We appreciate your consideration of our written comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'CLaPorte', with a long horizontal line extending to the right.

Christopher LaPorte
Founder/Managing Partner
RESET

Silver State Government Relations



Principals

Will Adler – will@ssgr.us

Sarah Adler – sarah@ssgr.us

Associates

Morgan Biaselli – morgan@ssgr.us

Alex Tanchek – alex@ssgr.us

June 15, 2023

Cannabis Compliance Board members,

As I mentioned in my public comment at the last CCB meeting, the Sierra Cannabis Coalition presented a petition to the Board on November 15, 2022 regarding the modernization of Nevada's cannabis laboratory testing regulations. The petition was denied by the Board for "procedural deficiencies," yet Board members approved in their motion a desire to see a workshop "conducted by the end of February or March." Taking into account the Governor's pause on new regulations, I spoke with his office to confirm their position on holding this workshop. It was communicated to me, as it was an action prior to the order, the workshop was fine to proceed if the Board wished to do so. Now that three-to-four months have passed since the month included in the Board's motion, the Sierra Cannabis Coalition believes it would be appropriate for the Board to begin the process of scheduling workshops to review Nevada's cannabis testing regime.

As a potential starting point, the Sierra Cannabis Coalition would like to reference recent changes Washington has made to their cannabis testing program. Washington's cannabis industry has some differences with the Nevada market, but Washington faced a similar challenge when it came to how it tests its cannabis. Washington, like Nevada, had a lab testing program that was effective when implemented, but had not aged well as newer techniques and better understandings of how cannabis should be tested were developed. To recertify this issue with lab testing, Washington did a comprehensive overhaul of its testing program, with proper consideration given to what needs to be tested and what quantities were appropriate to test. To clarify the changes Washington implemented, I have included a copy of the regulatory updates and a helpful infographic that shows what amendments were made and why.

Again, the Sierra Cannabis Coalition would ask the Board to continue with its previous motion to hold a workshop assessing Nevada's cannabis testing regulations. Washington is one of many states that has gone through this process and Nevada is overdue in taking that same step towards modernizing our own cannabis regulations.

Thank you,

Will Adler

Director

Sierra Cannabis Coalition

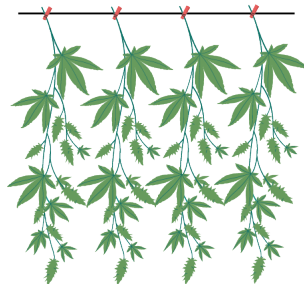


Previous Testing Requirements

- 1. Cannabis plant grows**
(indoor/ outdoor/ greenhouse)



- 2. Cannabis is cut down at harvest**

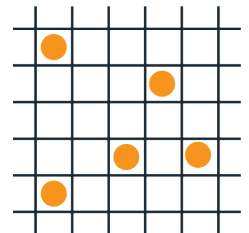


- 3. Plant is dried**



- 4. Plant is trimmed for bud**
(parts of plant that will be prepared for retail)

- 5. Products are tested by private labs**
(80% of cannabis only requires testing at this stage because of product type) for the established suite of tests (microbial, mycotoxins, moisture, potency, etc.)
- a. Flower
 - b. Mix
 - c. Concentrate



- 6. If product passed lab tests it is ready to go to retail**
- if it will remain in its current form.



- 7. After doing step 5 and after passing lab test, a product that is turned into new form (concentrate, edible cookie, topical, infused, etc.) must be tested again for potency.**



This is the simplest testing path.

There are conditions and products that would require additional rounds of "intermediate testing" as reflected at step 5

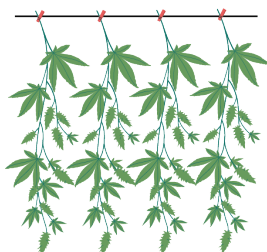


New Testing Requirements: Adding Pesticides

- 1. Cannabis plant grows**
(indoor/outdoor/greenhouse)



- 2. Cannabis is cut down at harvest**



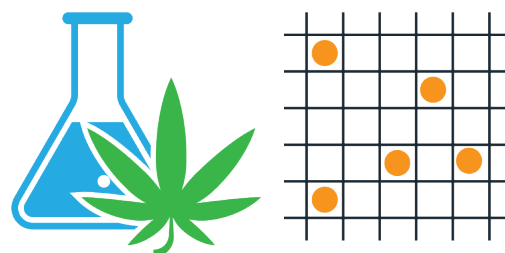
- 3. Plant is dried**



- 4. Plant is trimmed for bud**
(parts of plant that will be prepared for retail)

- 5. Third-party labs test product lots for foreign matter, microbiology, mycotoxins, potency, residual solvents, water activity, and the newly required screening of pesticides.**
Flower is sampled based on the weight of the lot.

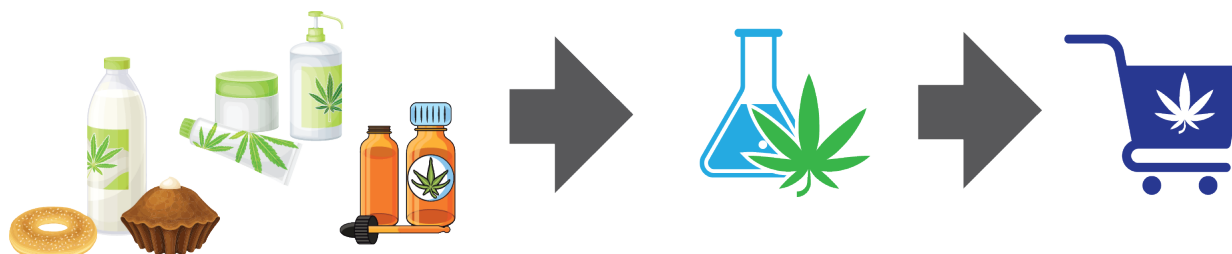
0 - <10 lbs. = 8x 1-gram sample increments
10 - <20 lbs. = 12x 1-gram sample increments
20 - <30 lbs. = 15x 1-gram sample increments
30 - <40 lbs. = 18x 1-gram sample increments
40 - <50 lbs. = 19x 1-gram sample increments



- 6. After passing tests, product is ready for retail.**



- 7. After doing step 5 and after passing lab tests, a product that is turned into new form (infused solid edible – cookie, chocolate, etc.) must be tested again for potency only.**



This is the simplest testing path.

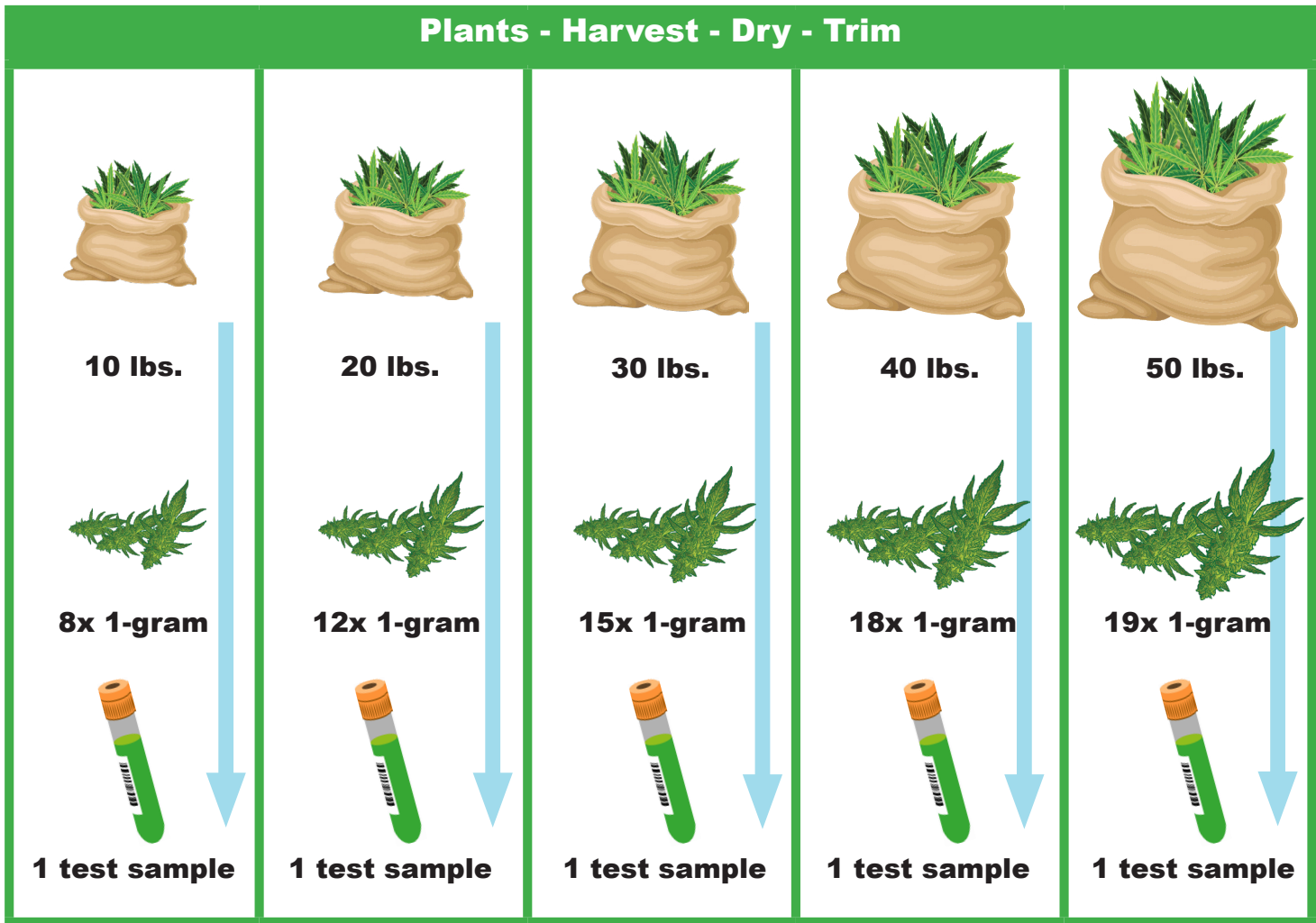
There are conditions and products that would require additional rounds of “intermediate testing” as reflected at step 5



Sample Collection

New

The number of sample increments will increase as the lot size increases for cannabis flower. The sample increments will be combined into one test sample and tested by a private testing laboratory. This singular sample is used for pesticides, potency, microbiology, mycotoxins, water activity, and foreign matter.



Previously

1 – 4 gram samples per 5 lbs. = 4 X1 grams of
micro/myco/residual solvents/moisture

Plants - Harvest - Dry - Trim

1	2
3	4

= 4 grams



**Washington State
Liquor and Cannabis Board**

Quality Control Testing and Sell Down Guide

For Washington State Cannabis Licensee

Version 1.1 – April 2022

What has changed?

- Streamline licensee sample collection and storage procedures
- Revise the number of marijuana flower samples required for testing
- Increase the maximum amount of cannabis flower that may be represented by a single I-502 panel of laboratory tests from five pounds to fifty pounds
- Eliminate the ability of certified labs to return unused portions of samples to licensees
- Revise guidance to labs regarding when to reject or fail a sample
- Update and expand information regarding testing levels for water activity, potency analysis, foreign matter inspection, microbial screening, mycotoxin screening, and residual solvent screening
- Update rule language regarding product retesting, remediation of failed lots, the expiration of certificates of analysis, and referencing of samples
- Update reporting requirements for lab proficiency testing

What Tests are required?

Reference WAC 314-55-102 for the full list of QC testing requirements and failure rates for licensed product.

The following tests will be required on all products created from cannabis harvested on or after April 02, 2022.

Cannabis Flower (Marijuana Flower):

- Water activity testing
- Potency analysis
- Foreign matter inspection
- Microbiological screening
- Mycotoxin screening
- Pesticide screening

If cannabis flower will be sold as useable flower no further testing is required.

Intermediate products:

Cannabis mix (Marijuana mix)

- Water activity testing
- Potency analysis
- Foreign matter inspection
- Microbiological screening
- Mycotoxin screening
- Pesticide screening

Concentrate or extract made with hydrocarbons, CO2 extractor, or ethanol

- Potency analysis
- Mycotoxin screening
- Residual solvent test
- Pesticide screening

Concentrate or extract made with approved food grade solvent, non-solvent extracts, or infused cooking oil or fat in solid form

- Potency analysis
- Microbiological screening
- Mycotoxin screening
- Residual solvent test
- Pesticide screening

Note: all intermediate products must be homogenized before sampling and testing.

End Products

Infused solid edibles

- Potency analysis
- Water Activity

Infused liquids, topicals, cannabis mix packaged (marijuana mix packaged), cannabis mix infused (marijuana mix infused), concentrate or infused product for inhalation

- Potency Analysis

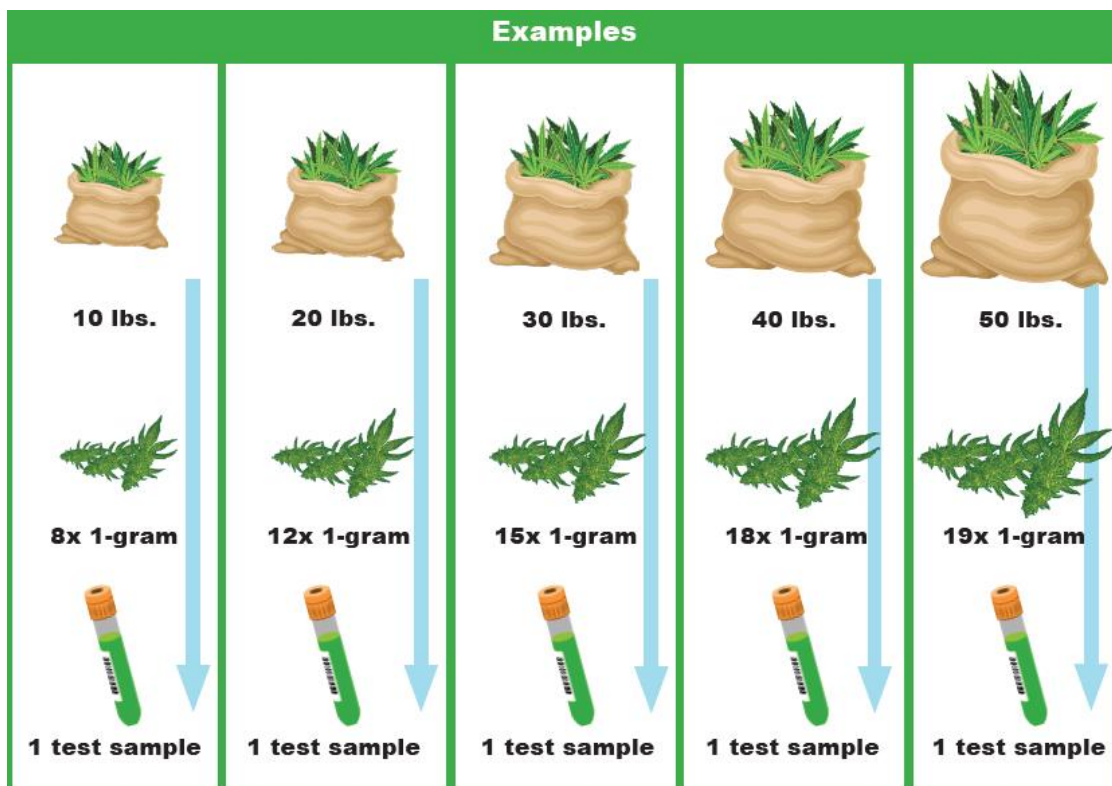
For more information on pesticide action levels please see WAC 314-55-108

What are the sampling requirements?

Reference WAC 314-55-101 for the full rules on collecting samples of cannabis products

Sampling sizes for cannabis (marijuana) flower lots:

- 0-10 lb lot 8 one gram samples
- 10-20 lb lot 12 one gram samples
- 20-30 lb lot 15 one gram samples
- 30-40 lb lot 18 one gram samples
- 40-50 lb lot 19 one gram samples



Selling down product tested under previous testing requirements

Producer Processor licensees

I am a licensed cannabis producer/processor, and have existing inventory that was harvested prior to April 02, 2022.

How long can this product be sold to retailers?

- With the existing passing COA, the product can be sold to licensed retailers until September 30, 2022
- This will include product with COAs that are older than 12-months.

Does this product have to pass pesticide testing to be sold after April 02, 2022?

- No, but it can only be sold to retailers until September 30, 2022 without the mandatory pesticide test.
- After September 30, 2022, all products sold to retailers must have been tested for pesticides.

Can I test my previous product for pesticide only, or do I have to test for everything again?

- Licensees may conduct a test for pesticides on existing inventory from before April 02, 2022, which can be included as an addendum to previous quality control testing.
- Product that fails the pesticide testing is subject to destruction in accordance with board rules.

If I conduct pesticide testing on product previously holding a valid COA, does that fully renew the existing COA?

- No, if only pesticide testing is conducted on product passing previous standards, it will be considered an addendum to the existing COA, and will continue to have the same expiration date.

If I choose to have my existing inventory completely retested to the new standards effective April 02, 2022, does that restart the time on the COA?

- Yes, if existing product is tested, undergoes the full suite of quality control standards effective April 02, 2022, then a new COA would be in effect with a new 12-month expiration.

What product can I have retested?

- Existing inventory that has not been sold to retailers.
- Any product currently in the retail market will not be eligible for retesting.

If a retailer wants to return existing product, can we allow the return?

This is situational:

- Yes, packaged product will be able to be returned, but not for retesting or reselling.
- Producer/Processors may offer an exchange of product, but this is at the discretion of the producer/processor, and returned product must follow existing destruction rules.
- Producer/Processors are not obligated to provide exchanges to retailers

What happens if a retailer does not want to purchase my existing inventory?

- This is a business decision for the retailer, and they are not obligated to purchase any specific product.

Which types of products have the new requirements?

- All cannabis product types are included under the rules effective April 02, 2022.

What about medically compliant product, does this need to be retested?

- No, any medically compliant product meeting the Department of Health medical cannabis program standards will not need to be retested for pesticides, but will still be subject to COA expiration standards after September 30, 2022.

Which labs are allowed to do these new tests?

- Those that are certified for the tests they are conducting.
- A list of certified labs can be found on the “Frequently Requested List” on the LCB website.

Are labs allowed to conduct a new test for my existing product that was previously tested before April 02, 2022?

Yes

- If the testing is for the full suite of quality control, a new COA can be issued for the product.
- If only pesticide tests are added to previously tested product, then the test results will be an addendum to the existing COA, and the original expiration will not change.

Retail Licensees

I am a licensed cannabis retailer, and have existing inventory that was harvested prior to April 02, 2022.

How long can I sell this existing inventory?

- Retailers can continue selling product purchased on or before September 30, 2022 until December 31, 2022, regardless of the COA expiration so long as the COA was valid at the time the retailer purchased it.

Which types of products have the new requirements?

- All cannabis product types are included under the rules effective April 02, 2022.

If I buy product from a producer/processor, am I responsible to ensure the COA is compliant with all testing standards?

- Retailers have the general responsibility of purchasing product from producer/processors that is not past the COA expiration date, but are not required to assess the COA for technical testing compliance standards.
- Retailers will be allowed to sell pre-April 02, 2022 inventory without an updated COA through December 31, 2022.
- After December 31, 2022, retailers may only sell product that has passed quality control standards under the rules effective April 02, 2022.

Can I ask a producer/process to take product back where the COA is expired?

- After December 31, 2022, the expiration date for the COA only applies to product sold by producer/processors to retailers.
- Once purchased by the retailer, this product (meeting post April 02, 2022 standards,) may continue to be sold even if the COA expired.
- Retailers may request an exchange, but the producer/processors are not obligated to grant the request.

How long will I have to sell through product I have in inventory?

- Product that has a valid COA, but predates April 02, 2022, may be sold to consumers through December 31, 2022.
- Product that has a valid COA that was issued after April 02, 2022 may continue to be sold, so long as the COA was not expired when the retailer purchased the product from the producer/processor.

If I place an order for product, do I need to accept product that does not meet standards effective April 02, 2022?

- No, but we encourage retailers to work with producer/processors to assist with a smooth transition
- This is a business decision which each retailer must decide related to their inventory management and sell through timeframes.

Resources

Rules

Sampling

- WAC 314-55-101

Quality Control

- WAC 314-55-102

Pesticides

- WAC 314-55-108

Contact your consultant or officer with any questions regarding new quality control rules or sell off of inventory questions.

If you do not know who your Consultant or Officer is, you can call Enforcement Customer Service at **360-664-9878** or email at **EnfCustomerService@lcb.wa.gov**

From: Elle Naitoh <elle@natmednv.com>
Sent: Monday, June 19, 2023 3:29 PM
To: CCB Regulations; CCB ConsumptionLounge
Cc: Alex Forman; Lindsay Klinitz; richard@airboxdirect.com; Adam Smith; j@airboxdirect.com
Subject: Attn Executive Assistant - Statement concerning proposed regulation change of NCCR 15.055
Attachments: Recomendated rewording of Reg 15 ventilation.pdf

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

Good afternoon,

Attached is our recommended rewording of NCCR 15.055, ventilation of the cannabis consumption lounge.

This recommendation is based on our partnership with AIRBOX, a technical leader in clean air conformance with 35+ years of experience designing the cleanest environments in the world (www.airboxairpurifier.com).

Kindly confirm receipt of this email and attachment and let us know if you have any questions. Thank you.

Best,

--



ELLE NAITOH | Director of Compliance

a: Green.

4510 S. Hualapai Way, Las Vegas, NV 89147

101 S. Rainbow Blvd. Suites 1-5, Las Vegas, NV 89145

a: Natural Medicine L.L.C.

2909 E. Alexander Way, North Las Vegas, NV 89030

e: elle@natmednv.com | **w:** greennv.com

m: 619.224.5061

To: NV CCB Executive Assistant
From: NATURAL MEDICINE L.L.C. / AIRBOX
Date: June 19, 2023
Subject: NCCR 15.055

Please see our recommended rewording of NCCR 15.055 in red text:

15.055 Ventilation of the cannabis consumption lounge. A ventilation plan must be submitted, approved, with changes as necessary, and fully implemented prior to issuance of a final license. At a minimum, the ventilation plan must include:

1. A separate ventilation system within any designated smoking room capable of 60 cfm/person with a minimum of 1.0 cfm/ft² that must be directly exhausted to the outdoors; The use of In-Room or In-Duct Air Cleaning Systems shall be permitted provided the cleaned air meets Class 2 Air quality requirements and has a TVOC concentration no greater than 0.75 ppm above ambient. Recirculation of up to 40 cfm/person of cleaned air within the smoking room shall be allowed.

Ventilation rates shall be such that CO₂ levels do not exceed 1200 ppm above ambient.

2. A separate system within the rest of the cannabis consumption lounge capable of 40 cfm/person with a minimum of 0.70 cfm/ft² that must be directly exhausted to the outdoors; ; The use of In-Room or In-Duct Air Cleaning Systems shall be permitted provided the cleaned air meets Class 2 Air quality requirements and has a TVOC concentration of less than 0.75 ppm above ambient. Recirculation of up to 40 cfm/person of cleaned air within the smoking room shall be allowed.

Ventilation rates shall be such that CO₂ levels do not exceed 1200 ppm above ambient.

3. The ventilation system within any smoking room must create a negative air pressure within the room;

4. A High-Efficiency Particulate Air (HEPA) filtration system, or equivalent system, capable of handling the entire volume of air within any separate room of the lounge; Please provide clarification on the application of the "HEPA Filtration System" described in section 4. IE section 4 simply describes the attributes of a filtration system but does not provide for the application of the system.

5. An odor mitigation plan that identifies, at a minimum, the following:

(a) The specific odor control equipment to be installed and operated to mitigate odor emissions prior to leaving the building;

(b) An engineering assessment approved by a certified professional engineer ensuring the odor control equipment installed and operated will mitigate odor emissions prior to leaving the building; and

(c) An operation and maintenance plan showing the monitoring frequency for preventative maintenance, the timely responses to equipment malfunctions and the record keeping and employee training in place to ensure the odor control equipment to be installed and operating is maintained per manufacturer's specifications.

(d) Any deviations from the odor mitigation plan or malfunction of equipment must be documented on a log that shall be provided to the Board upon request.

6. If the cannabis consumption lounge plans to use has an outdoor smoking area, the applicant must submit a request to the local jurisdiction and comply with any requirements the local jurisdiction may have regarding an outdoor smoking area.

7. Atmospheric monitoring of the non-smoking room of the cannabis consumption lounge focusing, at a minimum on an 8-hr average and 15 min peak CO₂ and PM 2.5 concentrations which must include an audible and visual notification system, alerting the facility to any failures.

8. Any local jurisdiction requirements. Local jurisdiction requirements can be more restrictive than the NCCRs.



Abby Kaufmann
Board of Directors, Secretary
abigailkaufmann94@gmail.com
919.757.4185

Nevada Cannabis Control Board

Public Comment for June 20, 2023 Public Board Meeting

To Whom It May Concern:

As the Secretary of the Board of Directors for the Chamber of Cannabis, I would like to thank you for sharing the [10 NCCRs that the CCB submitted for repeal](#), pursuant to section 2 of Governor Lombardo's [Executive Order 2023-03](#), that I requested during last month's meeting.

We appreciate your transparency on this matter and for your willingness to work with industry stakeholders to determine which regulations can be "streamlined, clarified, reduced or otherwise improved to ensure those regulations provide for the general welfare of the State without unnecessarily inhibiting economic growth."

In addition to expressing my thanks, I would like to address the five (5) NCCRs that were listed as "**Additional regulations proposed by stakeholders that require additional public input**" in the document provided by the CCB. These regulations include:

- NCCR 6.025 Board authorized to collect fee for costs for oversight; hourly rate.
- NCCR 12.030 Cannabis cultivation facility: Required labeling before sale of cannabis to another cannabis establishment.
- NCCR 12.035 Cannabis production facility: Required labeling of cannabis products before sale to retail store.
- NCCR 12.040 Cannabis sales facility and cannabis consumption lounge: Required labeling of usable cannabis and single-use cannabis product.
- NCCR 12.045 Cannabis sales facility and cannabis consumption lounge: Required labeling of cannabis products.

NCCR 6.025 Board authorized to collect fee for costs for oversight; hourly rate.

Given that [Senate Bill 195](#) largely addresses and revises the penalties and fines in NCCR 6.025, I do not foresee a need for any public input.

Per section 13 of SB195, this bill became effective upon passage. Therefore, as of June 13th, the CCB can no longer charge for the costs of "*ongoing activities of the Board relating to the oversight of a cannabis establishment, including, without limitation, any charge for costs relating to:*

- (a) Except as otherwise provided in subsection 5, travel or lodging for an agent of the Board;*
- (b) Any routine inspection or audit;*
- (c) The preparation for and attendance at a hearing by an agent of the Board;*



Abby Kaufmann
Board of Directors, Secretary
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(d) An investigation of a complaint submitted to the Board by a person who is not associated with the Board; or
(e) Except as otherwise provided in subsections 3, 4 and 5, any other type of inspection, audit or investigation.”

SB195, Section 11.8

In the event that any cannabis establishments were subject to any of the newly prohibited charges over the past 7 days, I request that the CCB takes necessary steps to communicate that the charges are no longer expected to be paid by the establishment.

NCCRs 12.030- 12.045

- **NCCR 12.030** Cannabis cultivation facility: Required labeling before sale of cannabis to another cannabis establishment.
- **NCCR 12.035** Cannabis production facility: Required labeling of cannabis products before sale to retail store.
- **NCCR 12.040** Cannabis sales facility and cannabis consumption lounge: Required labeling of usable cannabis and single-use cannabis product.
- **NCCR 12.045** Cannabis sales facility and cannabis consumption lounge: Required labeling of cannabis products.

The other four (4) NCCRs that were submitted and that require additional input all pertain to the required labeling of cannabis products for various types of cannabis facilities.

I am pleased to see that the CCB is taking steps to acknowledge the redundancy of the packaging and labeling requirements in our state and that they are open to hearing feedback from industry stakeholders.

Within the document posted by the CCB, and in regards to NCCRs 12.030-12.045, it states that:

*Change is being sought to standardize the rounding of percentage points on labels. CCB understands that this regulation could be improved, **so a workshop on labeling and packaging regulations will be conducted in June of 2023 to obtain more input from industry regarding this potential change.** CCB agrees that this regulation needs to be standardized.*

With just 10 days left in the month of June and given the fact that these regulations impact every part of the cannabis supply chain, I would like to request that the CCB (1) provide industry stakeholders with at least 30 days notice of the proposed workshop on labeling and packaging



Abby Kaufmann
Board of Directors, Secretary
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regulations and (2) include clear instructions for submitting input on the topic within the public notice of the workshop.

Nevada's stakeholders are seeking changes to the labeling and packaging regulations in our state that go *beyond* the standardization of the rounding of percentage points mentioned in this proposed repeal.

We are seeking changes that include the standardization of all labels, that minimize the amount of time, money, and labor involved in redundant labeling and excessive packaging, that protect public safety by providing clarity and consistency, and that reduce the tremendous amount of waste and negative environmental impact that the current regulations necessitate.

With the passage of SB277, we are also seeking revisions to NCCR 12.010 to account for the increased purchase limits.

We are eager to work alongside the CCB to implement sensible changes to the cannabis packaging and labeling requirements in our state and look forward to discussing this further at the upcoming workshop.

Thank you,

A handwritten signature in black ink, appearing to read "Abby Kaufmann", written over a horizontal line.

Abby Kaufmann

abigailkaufmann94@gmail.com

919-757-4185

From: Shaun Szameit <sszameit@encorelabs.com>
Sent: Monday, June 19, 2023 10:56 PM
To: CCB Meetings
Subject: Request for Opening an Application Window for Cannabis Laboratory Compliance Testing

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Dear Members of the Nevada Cannabis Commission,

I am writing to express my support for the Nevada Cannabis Commission's efforts in ensuring the safety and quality of cannabis products in our state. I kindly request that the commission exercise its authority to open an application window for cannabis laboratory compliance testing. I believe that by doing so, we can further enhance the integrity of the cannabis industry and safeguard the well-being of consumers.

Allow me to introduce Encore Labs, a highly reputable and well-established laboratory specializing in cannabis testing. With a proven track record of excellence, Encore Labs has been actively involved in ensuring product quality, potency, and safety in various cannabis markets. We have closely followed the significant progress made by the Nevada Cannabis Commission in establishing regulations and guidelines for the cannabis industry.

As a leader in compliance testing, Encore Labs is committed to meeting and exceeding the rigorous standards set forth by regulatory bodies. We employ state-of-the-art technology and a team of skilled scientists who are dedicated to upholding the highest levels of accuracy and reliability in our testing processes. Our comprehensive services include potency testing, pesticide screening, microbial analysis, residual solvent testing, and more.

We are particularly interested in entering the Nevada market for compliance testing, as we believe our expertise and commitment to quality align perfectly with the state's vision for a safe and thriving cannabis industry. By offering reliable and efficient laboratory testing services, we aim to contribute to the overall success and credibility of Nevada's cannabis ecosystem.

Opening an application window for cannabis laboratory compliance testing will not only attract experienced and reputable testing facilities like Encore Labs but will also encourage healthy competition, driving advancements in testing methodologies and ensuring continuous improvement. Moreover, this step will bolster consumer confidence.

In conclusion, I respectfully urge the Nevada Cannabis Commission to utilize its power and open an application window for cannabis laboratory compliance testing. Encore Labs is eager to contribute to Nevada's cannabis industry by providing top-tier testing services that will benefit both businesses and consumers alike. We look forward to hopefully having the opportunity to support the state's vision of a robust and responsible cannabis marketplace.

Thank you for your time and consideration. I remain at your disposal should you require any additional information or wish to discuss this matter further.

Sincerely,

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