



Coalition for Patient Rights: Administration

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[www.COALITIONFORPATIENTRIGHTS.org](http://www.COALITIONFORPATIENTRIGHTS.org)

## POSITION STATEMENT: Labeling Cannabis With Compassion For Patients Rights

The Coalition for Patient Rights (CPR) is committed to advancing the rights of all patients in the pursuit of accessing safe and effective medical cannabis treatments. From the heartbeat of our patients,

**CPR finds that labeling of products is paramount to providing medical quality products for treatment, and that no form of irradiation or remuneration after detection is acceptable. The point of testing for these items was to remove them for public safety reasons. Failed products should be removed from consumption as clearly indicated by the need to test for them in the first place. The solutions is NOT to irradiate and sell the dead biomass of bacteria or fungi. Without science to support this action, it is unethical and unacceptable.**

**CPR supports the addition to the regulations for labeling, specifically:**

“If the cannabis was treated with any process approved by a Board Agent for the purpose of reducing or eradicating microbial contamination at any time postharvest, a disclosure of the type of treatment process used” be on the label. 12.030 (f), 12.035 (k), 12.040 (h), 12.045 (l).

Our position is based on current empirical data that cannabis is also used for medical reasons and treatment by the **majority** of the “adult use” population. For patients to use cannabis safely, proper labeling is paramount. All consumers must be aware of any treatment of their cannabis, including any potential for biomass in their products from unwanted bacterial or fungi cells.

CPR would like to state that killing the biomass of bacteria and or fungi and selling it anyway, is unethical, and an unacceptable solution to positive detection, on a public safety issue. The testing regulation was put in place to protect the public safety. This becomes a complete failure if the solution for public safety is allowing the same biomass for consumption with remunerative or prophylactic irradiation; or any other treatment.

Thank you  
/Jason Greninger/  
PR Coalitions for Patients Rights  
Legislative & Congressional Outreach Coordinator

MSOplus: Coalition For Patient Rights Administration

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P.O. Box 750865, Las Vegas, NV 89136

[www.COALITIONFORPATIENTRIGHTS.org](http://www.COALITIONFORPATIENTRIGHTS.org) a 501(c)4 Social Welfare Organization [www.MyCPR.US](http://www.MyCPR.US)

Standing up for Patient Rights in Legislative and Congressional Forums When The Voice of Industry Gets Too Loud!

1

**From:** [Mary Jane](#)  
**To:** [CCB Regulations](#)  
**Subject:** Labeling of Treated Flower  
**Date:** Thursday, May 30, 2024 8:30:33 AM

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**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 Amber Jansen and I represent Talkin & Tokin, the patients, and consumers.

I would like to address the labeling of cannabis. While this has been a topic of concern for awhile I would hope this meeting will help guide you in the proper direction for what the consumers would like.

Cannabis deemed by the state of Nevada has medical value. I use cannabis on a daily basis. This is to help with focus and anxiety. While some may take prescriptions provided by a doctor for this, I choose natural over pharmaceuticals.

I use flower, the most natural unaltered form of cannabis available to me in Nevada. I like my cannabis free of chemicals and free of mold. However, I don't want flower(cannabis) that has failed for mold and is then treated by one of the many methods approved by the CCB. The board commonly compares cannabis regulations to food regulations. While the combustion part of cannabis doesn't make them an equal comparison. However, foods are labeled genetically modified. I avoid those and can do so now because of the labeling. That's my choice as a consumer.

I feel consumers should have that same right with cannabis that is treated. Why is a label a bad thing? RAD Source, Willow, and others will tell you how safe their equipment is. So why would they want to hide the fact their equipment is being used? There are cultivations in town that are for the labeling because they want to transparent. If you have good business practices and believe in your processes why not be transparent about it? Transparency is key.

I believe adding this information in the soil amendment is bizzare. Why or how would you do this? Most don't know what a soil amendment is. Think about it from a consumer side. You go to the store and see a new product you want. If the information is not on the product how do you get it? After checking with multiple dispensaries, a large amount didn't even know what a COA is. Some told us that they are not allowed to share those. As for the Soil amendment there is NO regulation that the dispensary can share that with a consumer. So how do you expect the consumer to obtain this information?

If you care about consumers you will label the product. Putting the label on the soil amendments is a way of saying you hear the consumer, however, you're not really concerned about them. We need a way to identify treated flower while in the store making the purchase.

Thank you for your time.

Amber Jansen



May 30, 2024

Cannabis Compliance Board  
700 Warm Springs Road, Suite 100  
Las Vegas, NV 89119  
Via email to: [regulations@ccb.nv.gov](mailto:regulations@ccb.nv.gov)

Subject: Workshop on Proposed Changes to NCCR Regulation 12

Dear Cannabis Compliance Board Members and Director Humm,

On behalf of the members of the Nevada Cannabis Association, we are submitting this comment in advance of the workshop on May 31, 2024.

### **NCCR 12.015 Packaging Changes & Working Through Existing Packaging**

With respect to the proposed packaging changes in NCCR 12.015, CCB staff stated at the March 28, 2024 workshop that they plan to allow one year to work through existing packaging and then will allow a label containing the new warning to be affixed to the existing packaging until all of a licensee's current stock is used up.

Being able to use up existing packaging is important both economically and environmentally, and we appreciate staff's proposed solution. Re-ordering new packaging to accommodate regulation changes can cost between \$50,000 for a smaller operator to hundreds of thousands of dollars for larger operators. Additionally, because many licensees order packaging as far as a year in advance, there is significant time needed to work through existing packaging and an environmental cost if packaging cannot be used in time.

We did not see the allowance to work through existing packaging reflected in the final version of the regulations, and therefore wanted to make sure that this is included in the language of the regulations and on the record when the Board votes to adopt these regulations.

### **NCCR 12.030(f), 12.035(k), 12.040(i), 12.045(l)**

These sections all contain a new disclosure to be included on the label of cannabis and cannabis products treated with any process for the purpose of reducing or eradicating microbial contamination at any time post-harvest.

We acknowledge differences of opinion on the proposed language across the industry. As an association, we are not taking a position. We hope that the Board will carefully consider the evidence presented and whether the language and placement of the disclosure would deter consumers from purchasing safe, legal, taxable products.

### **NCCR 12.040, 12.045, 12.050**

One of the most consistent concerns we receive from dispensaries is the volume of waste created by printing labels at the point of sale. For example, one dispensary estimates that it prints around one million labels a year, which they calculate as generating approximately 2,897 pounds of label waste. Multiply that by around 100 dispensaries in Nevada, and that is



approximately 289,700 pounds of label waste. Over 10 years, that equals more than 2.8 million pounds of trash.

Regulations NCCR 12.040 and 12.045 allow for dispensaries and lounges to affix to, include with, or “supply through an electronic medium approved by the appropriate board agent” label information. Most of the information on the label is already provided by the cultivation or production facility. However, dispensaries print a new label at the point of sale to include the dispensary’s name and address. In an effort to aid dispensaries in reducing waste while conveying required information, we suggest moving the name and address requirements of NCCR 12.040(d) and 12.045(c) to 12.050 so that they can be provided as written or electronic notification, e.g., on a receipt. Additionally, any proposed new warnings should be added to the list of warnings in NCCR 12.050, not to NCCR 12.040 or 12.045. These very small changes will still ensure that this information is conveyed to the customer while reducing a significant amount of waste.

Thank you for your consideration of these comments, and we look forward to further discussing the proposed changes at the workshop.

Respectfully,

Layke A. Martin, Esq.  
Executive Director  
Nevada Cannabis Association

**From:** [Brett Scolari](#)  
**To:** [James Humm](#); [Karalin Cronkhite](#); [Michael Miles](#); [CCB Regulations](#)  
**Cc:** [Amanda Connor](#); [Kimberly Maxson-Rushton](#); [John Ocegquera](#)  
**Subject:** Regulation 12 - Proposal  
**Date:** Thursday, May 30, 2024 11:29:01 AM  
**Attachments:** [Outlook-Strategies.png](#)  
[Proposed CCB NCCR 12.065 \(5.2024\)\(v.1\) \(002\).docx](#)

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

Good Morning,

In conjunction with Amanda Connor and Kimberly Maxson-Rushton, I am submitting the attached proposal for Regulation 12.065. The proposal would be to: (1) amend and replace NCCR 12.065 with this proposed language; and (2) delete CCB's proposed subsections (1)(f) to NCCR 12.030, (1)(k) to NCCR 12.035, (1)(i) to NCCR 12.040 and (1)(l) to NCCR 12.045 (which are reflected on the CCB version dated May 16, 2024).

Note also that this proposal has been shared with the Nevada Cannabis Association and the Nevada Chamber of Cannabis.

We would sincerely appreciate your consideration.

Lastly, I would like to request to appear remotely to provide comment at tomorrow's workshop.

Thank you,

Brett



**Brett J. Scolari, ESQ.**

Vice President of Government Relations, Nevada

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### **Proposed Change to NCCR 12.065**

A cultivation facility or production facility must disclose in writing with each lot of usable cannabis or cannabis products and each production run of concentrated cannabis or cannabis products provided to a cannabis sales facility or consumption lounge, documentation disclosing the post-harvest treatment or remediated lots or production runs, including the date and information on the approved process which can be provided via an electronic medium such as a QR code or website link. All post-harvest treatment or remediation processes must be pre-approved by the appropriate Board agent. Upon consumer request, a cannabis sales facility and cannabis consumption lounge must provide with all usable cannabis and cannabis products sold at retail or ready-to-consume cannabis product and single-use cannabis product sold at cannabis consumption lounges, the post-harvest disclosure provided by a cannabis cultivation facility or cannabis production facility pursuant to this section.

Thursday, May 30, 2024

Cannabis Compliance Board  
700 Warm Springs Rd, Ste 100  
Las Vegas, NV 89119

**Via email to:** regulations@ccb.nv.gov

**Re: Solicitation of Input on NCCR 12.**

Dear Cannabis Compliance Board and Director Humm,

On behalf of Green Thumb Industries, Inc. (“GTI”), I respectfully submit these written comments in response to the proposed permanent regulations issued by the Nevada Cannabis Compliance Board (CCB) to NCCR Regulations 12. We have carefully reviewed the proposed regulations and wish to offer our insights on several key sections:

*I.* NCCR 12.070 (3) and (6):

While we acknowledge the incorporation of advertising guidance into the regulation, we find the requirement of including the establishment name and license number on all advertisements burdensome, especially for operators with multiple licenses. We recommend striking subsection 3 in its entirety, which would alleviate confusion and burdens on the business.

Further, we recommend striking “fruit” from the description of items that are attractive to children. Fruit by itself is not attractive to children, rather it is the cartoon depictions of fruit and other renderings that would be attractive to children.

(6) A cannabis establishment shall not engage in advertising that in any way makes cannabis or cannabis products appeal to children, including without limitation, advertising which uses an image of a cartoon character, mascot, action figure, balloon, **fruit** or toy. The cannabis establishment shall ensure that the advertisement is not modeled after a brand of products primarily consumed by or marketed to children.

*II.* NCCR 12.015(1)(a), (1)(i) and (5)(a):

We urge the CCB to allow warnings to be placed on a label rather than directly on the package. A similar warning is already required on packaging, and making this adjustment would impact all packing in NV. Even if time is allowed to sell through our inventory of current packaging, adding warnings directly onto packaging will be costly and burdensome, and leaves little flexibility to pivot or adjust if additional regulatory requirements are added or removed from packaging in the future. We would recommend allowing this warning to be included on a label.

*III.* NCCR 12.035 (k), 12.040 (i), 12.045 (l), and 12.065

We urge the CCB to revise the proposed requirement for disclosing microbial treatment processes with a more targeted approach to a specific eradication method and focus on public education rather than overly broad mandatory labeling. The proposed labeling requirement, as written, would encompass both ionizing and non-ionizing treatment methods. Non-ionizing radiation, like microwaves, is widely used and recognized as safe, posing no significant health risks. Including such treatments in the labeling requirement could create unnecessary fear and confusion among consumers for a process that is very similar to what is used in most households.

Moreover, there is no scientific evidence suggesting that treated cannabis poses any health risks that justify special labeling. For example, irradiation is a well-established and safe method used for sterilizing food and medical supplies in other industries. Mandating labels for cannabis products treated with “*any process...* for the purpose of reducing or eradicating microbial contamination” could mislead consumers into thinking these products are unsafe, despite the routine and safe use of the process in other contexts.

\* \* \*

We value the collaborative approach taken by the CCB in soliciting feedback from stakeholders. We remain committed to working together to develop regulations that promote public health and safety while fostering a thriving cannabis industry in Nevada. Should you require any further clarification or information, please do not hesitate to contact us.

Best Regards,

Tiffany Newbern-Johnson  
Director of Government Affairs





May 30, 2024

Cannabis Compliance Board  
700 E. Warm Springs Road, Suite 150  
Las Vegas, NV 89119

Via email to [regulations@ccb.nv.gov](mailto:regulations@ccb.nv.gov)

**Subject:** Chamber of Cannabis Input on Regulation 12

Members of the Board and Executive Director Humm,

Before diving into the main topic of today's discussion, I ask the CCB to consider the following revisions, which, collectively, could significantly reduce the amount of waste and excessive costs involved with labeling compliance.

**12.040 Cannabis sales facility and cannabis consumption lounge: Required labeling of usable cannabis and single-use cannabis products.**

...

~~(f)(d) The name and address of the cannabis sales facility or cannabis consumption lounge;~~

...

~~(k)(g) A warning that states: "THIS PRODUCT CONTAINS CANNABIS";  
(l)(h) A warning that states: "Keep out of Reach of Children"; and~~

**12.045 Cannabis sales facility and cannabis consumption lounge: Required labeling of cannabis products and single-use cannabis products.**

...

~~(d)(c) The name and address of the cannabis sales facility or cannabis consumption lounge;~~

**12.050 Cannabis sales facility and cannabis consumption lounge: Required disclosures, ~~and~~ warnings, and information.**

...

2. A cannabis sales facility and cannabis consumption lounge must provide with all usable cannabis and cannabis products sold at retail or ready-to-consume cannabis product and single-use cannabis product sold at cannabis consumption lounges, a written notification or an electronic notification through an electronic medium approved by the appropriate board agent which contains the following **warnings:**

...

~~(l) The name and address of the cannabis sales facility or cannabis consumption lounge~~



The labeling requirements in NCCRs 12.030 and 12.040 are nearly identical, as are the labeling requirements in NCCRs 12.035 and 12.045 — the one exception is that 12.040(g) and 12.045(c) require labels to include the name and address of the sales facility. There also appears to be a discrepancy/redundancy whereby 12.040 requires the same warnings that are already required in 12.015 and that were removed from 12.045. [See [EXHIBIT A](#)]

If the CCB were to move 12.040(g) and 12.045(c) into NCCR 12.050, this could eliminate the need for sales facilities to print an additional label and would have no impact on public health or safety.

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As a 501(c)6 organization, the Chamber of Cannabis' primary purpose is to serve our members and represent their collective interests as they are expressed to us.

In my role as Chairwoman of our Commerce Committee and as the Secretary to the Board of Directors, I have not received any member feedback against the specific changes that the CCB originally proposed since it was originally posted on April 15, 2024.

The feedback that I have received has been in favor of keeping the language in NCCRs 12.030(f), 12.035(k), 12.040 (i), 12.045 (l) stating: *“If cannabis being used to make cannabis products was treated with any process approved by a Board Agent for the purpose of reducing or eradicating microbial contamination at any time post-harvest, a disclosure of the type of treatment process used.”* and with this language, eliminating NCCR 12.065.

After reviewing the related materials from past workshops, public comments, legislative commission meeting minutes, etc; on NCCR 12.065 [see APPENDIX A] it appears that **most** objections were regarding the language, the use of the radura symbol, and/or radiation treatment being singled out. The current language requires a disclosure for all treatment methods and does not require words like “warning” or “caution”.

If operators are concerned about an uninformed consumer misinterpreting the disclosure, there is the option to include this information through an electronic medium instead of on the package itself. The medical patient or educated consumer could **easily access** this information without the operator having to openly display this disclosure to the general public.

During the May CCB meeting, several members of the public suggested that, in lieu of this labeling requirement, operators should be required to make the soil amendment report available upon request. Soil amendment reports are not something that most consumers know how to read or interpret and, if they do, this does not make the information readily available to them and



would likely cause delays at checkout – for the requester and for everyone behind them in line. All of this is also presuming the consumer knows they can ask for this report.

Regardless of the outcome of today's workshop, it would be beneficial for the CCB to make a resource available to the public outlining which treatment methods are approved and explaining what these treatment methods entail, both for dispensary agent card holders and for consumers.

Again, my comments today are on behalf of the Chamber of Cannabis and are reflective of the input we have received from our members and what has been discussed by the Commerce Committee.

***Note:** Any views or opinions expressed by individuals and/or businesses affiliated with the Chamber of Cannabis are their own and do not necessarily represent the organization's position as a whole.*

Committee participation is one of many member benefits the Chamber offers and membership is available to any individual or business.

We firmly believe that, by working together with all segments of the industry, we can create a more conscientious, inclusive, and thriving cannabis space that benefits both businesses and society as a whole.

As such, please do not hesitate to reach out with any questions or concerns – we welcome your input and appreciate your consideration.

Highest regards,

**Abby Kaufmann**  
**on behalf of the Commerce Committee**  
Chamber of Cannabis  
[secretary@cofclv.org](mailto:secretary@cofclv.org)



[EXHIBIT A]

**Reg. 12 Packaging & Labeling Summary**

NCCR	12.030	12.035	12.040	12.045	12.050	12.015
Establishment ID & name	Yes - Cultivation	Yes	Yes - Cultivation	Yes - Production		No
Inventory package ID/parent tag	Yes	Yes	Yes	Yes		No
Date of final harvest	Yes	No	Yes	No		No
Date of testing	No	No	No	No		No
Date of packaging	No	No	No	No		No
Date of manufacturing	No	Yes, if non-edible (production date)	No	Yes, if non-edible (manufacture date)		No
Expiration Date	No	Yes, if edible	No	Yes, if edible		No
Detected cannabinoids and top 3 terpenes if detected	Yes	Yes	Yes	Yes		No
Servings	No	Yes, if edible	No	No	No	Yes
Quantity / Weight	Quantity	Net Weight	Quantity Sold and net weight by volume	Net weight of the cannabis product		Net weight
Warnings	No	No	Contains cannabis; Keep out of reach of children; May have intoxicating effects and be habit forming.	No	Yes	Yes
Name and address of sales facility	No	No	Yes	Yes		No
May be unlawful outside of NV	No	No	No	No	Yes	No
List of ingredients and allergens	No	Yes	No	Yes		Yes
THC Concentration/total Amount	May include potential total	Yes (in product and, if edible, in each serving)	May include potential total	Yes, total in product (in mg) AND if edible, total amount in each serving		Yes in milligrams and number of servings for edibles
Notice of +/- 15% THC percentage	No	No	No	No		Yes
If the cannabis was treated with any process for the purpose of reducing or eradicating microbial contamination post-harvest with disclosure on type of treatment process	Yes	Yes	Yes	Yes		
Disclosure on method	No	Yes - Extraction process & solvent	No	Yes - Extraction process & Solvent		No
Copy of soil amendment report and CoA					Yes, upon request	



## [EXHIBIT B]

# Regulatory Timeline of Events for NCCR 12.065

2020

**June 12, 2020** - [Public notice](#) of first CCB Workshop

**June 18, 2020** - First CCB workshop on [first set of proposed NCCRs](#). No mention of or objections to 12.065 in [comments for first CCB workshop](#)

**July 21, 2020** - First ever [CCB Board Meeting](#) to adopt permanent regulations; these included/introduced NCCR 12.065. First objection to 12.065 shared in verbal public comment per [meeting minutes](#) by RAD Source.

**Dec. 2, 2020**- RAD Source [filed a petition](#) requesting that the CCB repeal the following regulation:

***12.065 Cannabis treated with radiation. If any cannabis or cannabis product has been treated with radiation at any time, any and all packaging of the irradiated cannabis or cannabis product must include labeling that contains the following statement: "NOTICE: This product contains ingredients that have been treated with irradiation" in bold lettering, along with the Radura symbol as used by the U.S. Food and Drug Administration.***

**Dec. 18, 2020** - CCB Posted [notice of solicitations of input on 12.065](#), presumably in response to the RAD source petition earlier that month, AND suspended enforcement of NCCR 12.065 Big emphasis on the use of the radura symbol and the warning language not being scientifically proven.

2021

**January 19, 2021** - Workshop on 12.065. RAD Source shared a [Presentation](#) and [454 pages of input](#). Additional ***comments in support of RAD Source's petition came from:***

1. [N. Puliz \(THC Nevada\)](#)
2. [NuLeaf](#) (via Argentum Law)
3. [G3 Labs LLC](#) -
4. [Integral and CCLV Manufacturing](#) (via Conner & Conner)

***Comments in favor of petition, primarily/solely due to language and radura symbol:***

1. [Clark Natural Medicinal Solutions](#)
2. [Public Input Ziel](#)

***Comments AGAINST petition/ in favor of keeping 12.065:***

1. [White Cloud Botanicals](#)



2. [C. Robinson](#) -
3. [E. Marder \(Fleur Cannabis\)](#) / [Public Input Marder](#) x 2-
4. [Silver State Government Relations](#) (Will Adler)
5. [Public Input Willow Industries](#)

**August 25, 2021** - [Notice of hearing on 12.065](#) to take place during Sept 2021 Board meeting. [Hearing subsequently canceled.](#)

2022

**March 11, 2022** - CCB Posted [Notice of workshop to amend 12.065](#) (among other things)

**March 22, 2022** - Workshop on NCCR 12 (and lounges)

- [Proposed changes to NCCR 12](#)
- [Public Comments \(2\)](#) – Ziel requested revisions of 12.065, Willow expressed need to keep it but improve clarity,

**December 28, 2022** - Legislative Commission meeting regarding CCB Regulations in Agenda Item VC

- [Agenda](#)
- [Letter submitted by RAD Source](#)
- [Meeting Minutes](#)

2023

**October 18, 2023** - Workshop on Packaging, Labeling and Advertising Regulations, Possession and Sales Limit Regulations with public comment on 12.065 and radiation treatment made [during public comment](#) (not reflected in meeting minutes).

2024

**January 25, 2024** - CCB Posted [notice of solicitation of input on ALL regulations](#) for later that month

**January 31, 2024** - CCB Held Workshop Soliciting input on ALL regulations. Remediation and concerns about the CCB not enforcing 12.065 came up SEVERAL times during the January 2024 workshop.

- [Proposed Changes to NCCR - Events \(01.31.2024\)](#)
- [Meeting Minutes](#)
- [Link to Live Stream](#)
- Public Comments
  - [Public Comments 01.31.2024](#)
  - [Additional Public Comments 01.31.2024](#)



- [Additional Public Comments 01.31.2024 \(part 2\)](#)

### **March 13, 2024**

CCB Posted [Notice of Workshop on NCCR 4.5.6.7.12.13](#) , many of the NCCRs directly reflected industry input solicited in January Workshop. This also included the introduction of the first Small Business Impact Survey **on the specific regs listed in the notice**

- [Proposed Changes to NCCR 4 5 6 7 12 13 - Packaging and Advertising v022924](#)
- [Small Business Impact Statement Summary](#)

### **March 28, 2024**

CCB Workshop on changes to NCCR 4,5,6.7,12,13. This was the first workshop under the APA so it was not clear whether/when/how to address regulations like NCCR 12.065 that were not included in the scope of the workshop. A few attendees **did** bring this up at various points but the CCB **did somewhat discourage** the topic being discussed during the workshop portion, recommending it be discussed during normal public comment period at beginning and end of every meeting.

- [Meeting minutes](#)
- [Proposed Changes to NCCR 4 5 6 7 12 13 - Packaging and Advertising v022924](#)
- [Link to live stream](#)

**April 15, 2024** - CCB Posted [Notice to Adopt Changes to NCCR 4,5,6,7,12,13](#), including updates from input received during March Workshop on these NCCRs After the March Workshop, the CCB received an update form the Legislative Counsel Bureau regarding what they are able to do/ the legal status of RAD Source’s petition and subsequent actions. In light of the feedback collected at the January and March workshop, the CCB included the **repeal** of **12.065 (which is what the 2020 petition wanted)**. But/and it also included the **addition** of a label requirement in Section 1 of each of the following NCCRs:

***12.030(f), 12.035(k), 12.040 (i), 12.045 (l)***

*If cannabis being used to make cannabis products was treated with any process approved by a Board Agent for the purpose of reducing or eradicating microbial contamination at any time post-harvest, a disclosure of the type of treatment process used.*

**April 18, 2024** - “Normal” Monthly CCB Public Board Meeting (*opportunity to publicly state concerns on any topic such as remediation labeling during public comment period*)

**April 30, 2024** - *Unrelated workshop but another opportunity for public comment.*

**May 14, 2024**- *Another unrelated workshop with opportunities for public comment*



**May 16, 2024** - Objections raised at hearing to adopt regulations, leading CCB to schedule a workshop to address Reg. 12 specifically. The other changes and regulations were voted in by the Board.

- [Meeting Agenda](#)
- [Link to live stream](#)
- [Notice to Adopt Changes to NCCR 4,5,6,7,12,13](#) (from 4/15/2024)
- [Public Comments for 5/16 Board Meeting](#) - specific to Reg 12
  - In favor
    - Coalition for Patient Rights, Jason Greininger
  - Opposed
    - Cooper Levenson on Behalf of RAD Source Tech

The CCB posted [notice of workshop](#) on Reg 12 that will be held on May 31st. They must submit their initial round of regulatory changes under the APA by July 1st.

- [Proposed Changes to NCCR 12 Packaging and Advertising 05.16.24](#)
- [Small Business Impact Survey \(ends 05.23.2024\)](#)

**May 31, 2024** - Workshop on [Proposed Changes to NCCR 12 Packaging and Advertising 05.16.24](#)

- [Small Business Impact Survey Responses](#)
- While **few respondents felt that there would be beneficial** impacts, a (narrow) **majority of respondents stated that there is no direct adverse impact.**

	Direct Adverse Impact	Indirect Adverse Impact	Indirect Beneficial Impact	Direct Beneficial Impact
Yes	43%	28%	17%	25%
No or unsure/unaffected	56%	72%	83%	75%

- ***“The agency considered the feedback from the public and determined that revisions to the proposed language were not necessary to reduce the impact on small businesses.”***

**PROPOSED LANGUAGE:**

***12.030(f), 12.035(k), 12.040 (i), 12.045 (l)***

*If cannabis being used to make cannabis products was treated with any process approved by a Board Agent for the purpose of reducing or eradicating microbial contamination at any time post-harvest, a disclosure of the type of treatment process used.*

~~***12.065 Cannabis treated with radiation. If any cannabis or cannabis product has been treated with radiation at any time, any and all packaging of the irradiated cannabis or cannabis product must include labeling that contains the following statement: “NOTICE: This product contains ingredients that have been treated with irradiation” in bold lettering, along with the Radura symbol as used by the U.S. Food and Drug Administration.***~~