

June 21, 2024

Adriana Guzman Fralick, Chair  
Nevada Cannabis Compliance Board  
700 E. Warm Springs Road, Suite 100  
Las Vegas, Nevada 89119

Re: Support for NCCR 12 – Option C

Dear Chair Guzman Fralick and Members of the CCB:

CPCM Holdings, LLC -DBA- Green & Gold Supply Co. (G&G) submits this letter of support for the proposed regulation language contained in NCCR 12.065 - **Option C**.

As the CCB materials reflect, there is no scientific data of a consumer having an adverse reaction from cannabis, which has been decontaminated (post-harvest) using a CCB approved process. Like the CCB, cultivators have a vested interest in ensuring the quality and safety of our products. This is why growers spend significant time and resources investigating the best way to treat/decontaminate our cannabis. The CCB's approval of the various decontamination processes is also what we and consumers rely on as confirmation that they are safe. For this reason, G&G strongly urges the CCB to support a process where cultivators provide information with their product when transferred to another cannabis establishment, similar to what is commonly known as a "soil amendment.". Specifically, the language would confirm that a CCB approved process was used and include a link to the list of approved processes. By doing so, it lessens the burden on cultivators and retailers and provides a means to which consumers can access valuable post-harvest information, including but not limited to confirming the CCB's approval of the treatment process used.

Regulations should not create new standards for licensees, which the Legislature has not otherwise required by law. For these reasons G&G asks that **Option C** be adopted.

Thank you for your consideration of my comments and recommendations.

Best Regards,  
*/s/ Mitchell D. Britten*  
*Managing Partner & CEO*  
*CPCM Holdings, LLC*

June 21, 2024

Adriana Guzman Fralick, Chair  
Nevada Cannabis Compliance Board  
700 E. Warm Springs Road, Suite 100  
Las Vegas, Nevada 89119

Re: Support for NCCR 12 – Option C

Dear Chair Guzman Fralick and Members of the CCB:

CPCM Holdings LLC -DBA- Smoke & Mirrors (S&M) submits this letter of support for the proposed regulation language contained in NCCR 12.065 - **Option C**.

As the CCB materials reflect, there is no scientific data of a consumer having an adverse reaction from cannabis, which has been decontaminated (post-harvest) using a CCB approved process. Like the CCB, retailers and consumption lounges have a vested interest in ensuring the safety of our consumers. The CCB's approval of the various decontamination processes is also what retail and consumption lounge operators and our consumers rely on as confirmation that products are safe. For this reason, S&M strongly urges the CCB to support a process where cultivators or producers provide information with their products when transferred to a retail or lounge operator, similar to what is commonly known as a "soil amendment." Specifically, the disclosure would confirm that a CCB approved process was used and include a link to the list of approved processes. By doing so, it lessens the burden on retail and consumption lounge operators from a labeling perspective and provides a valid means by which consumers can request access to valuable post-harvest information at our locations, including but not limited to confirming the CCB's approval of the treatment process used. This is consistent with a consumer's right to access pre-harvest treatment information included in the "soil amendment."

Regulations should not create new standards for licensees, which the Legislature has not otherwise required by law. For these reasons S&M asks that **Option C** be adopted.

Thank you for your consideration of my comments and recommendations.

Best Regards,  
/s/ Mitchell D. Britten  
Managing Partner/CEO  
CPCM Holdings, LLC

June 21, 2024

Adriana Guzman Fralick, Chair  
Nevada Cannabis Compliance Board  
700 E. Warm Springs Road, Suite 100  
Las Vegas, Nevada 89119

Re: Support for NCCR 12 – Option C

Dear Chair Guzman Fralick and Members of the CCB:

CPCM Holdings LLC -DBA- Thrive Cannabis Marketplace (THRIVE) submits this letter of support for the proposed regulation language contained in NCCR 12.065 - **Option C**.

As the CCB materials reflect, there is no scientific data of a consumer having an adverse reaction from cannabis, which has been decontaminated (post-harvest) using a CCB approved process. Like the CCB, retailers and consumption lounges have a vested interest in ensuring the safety of our consumers. The CCB's approval of the various decontamination processes is also what retail and consumption lounge operators and our consumers rely on as confirmation that products are safe. For this reason, THRIVE strongly urges the CCB to support a process where cultivators or producers provide information with their products when transferred to a retail or lounge operator, similar to what is commonly known as a "soil amendment." Specifically, the disclosure would confirm that a CCB approved process was used and include a link to the list of approved processes. By doing so, it lessens the burden on retail and consumption lounge operators from a labeling perspective and provides a valid means by which consumers can request access to valuable post-harvest information at our locations, including but not limited to confirming the CCB's approval of the treatment process used. This is consistent with a consumer's right to access pre-harvest treatment information included in the "soil amendment."

Regulations should not create new standards for licensees, which the Legislature has not otherwise required by law. For these reasons THRIVE asks that **Option C** be adopted.

Thank you for your consideration of my comments and recommendations.

Best Regards,  
/s/ Mitchell D. Britten  
Managing Partner/CEO  
CPCM Holdings, LLC



June 24, 2024

Adriana Guzman Fralick, Chair  
Nevada Cannabis Compliance Board  
700 E. Warm Springs Road, Suite 100  
Las Vegas, Nevada 89119

Re: Support for NCCR 12 – Option C

Dear Chair Guzman Fralick and Members of the CCB:

DEC Ops NV submits this letter of support for the proposed regulation language contained in NCCR 12.065 - Option C.

Like the CCB, DEC has a vested interest in ensuring the quality and safety of our products. This is why DEC has spent substantial resources researching the best methods to treat/decontaminate our cannabis. As the CCB materials reflect, there is no scientific data of a consumer having an adverse reaction from cannabis, which has been decontaminated (post-harvest) using a CCB approved process. DEC strongly urges the CCB to support a procedure where cultivators provide information when their product is transferred to another cannabis establishment, similar to what is commonly known as a “soil amendment.” The language should confirm that a CCB approved process was used and include a link to the list of approved processes. By doing so, the burden on cultivators and retailers is reduced while also providing a process whereby consumers can access valuable post-harvest information.

Regulations should not create new standards and burdensome processes for licensees, which the Legislature has not otherwise required by law. For these reasons DEC Ops NV asks that Option C be adopted.

Thank you for your consideration.

Sincerely yours,

DEC Ops NV

# TGNV, LLC

June 21, 2024

Adriana Guzman Fralick, Chair  
Nevada Cannabis Compliance Board  
700 E. Warm Springs Road, Suite 100  
Las Vegas, Nevada 89119

Re: Support for NCCR 12 – Option C

Dear Chair Guzman Fralick and Members of the CCB:

TGNV, LLC submits this letter of support for the proposed regulation language contained in NCCR 12.065 - Option C.

As the CCB materials reflect, there is no scientific data of a consumer having an adverse reaction from cannabis, which has been decontaminated (post-harvest) using a CCB approved process. Like the CCB, cultivators have a vested interest in ensuring the quality and safety of our products. This is why growers spend significant time and resources investigating the best way to treat/decontaminate our cannabis. The CCB's approval of the various decontamination processes is also what we and consumers rely on as confirmation that they are safe. For this reason, TGNV, LLC strongly urges the CCB to support a process where cultivators provide information with their product when transferred to another cannabis establishment, similar to what is commonly known as a "soil amendment." Specifically, the language would confirm that a CCB approved process was used and include a link to the list of approved processes. By doing so, it lessens the burden on cultivators and retailers and provides a means to which consumers can access valuable post-harvest information, including but not limited to confirming the CCB's approval of the treatment process used.

Regulations should not create new standards for licensees, which the Legislature has not otherwise required by law. For these reasons TGNV, LLC asks that Option C be adopted.

Thank you for your consideration of my comments and recommendations.

Sincerely yours,

*/s/ Zachary A. Kozak, CEO*

TGNV, LLC



June 21, 2024

Adriana Guzman Fralick, Chair  
Nevada Cannabis Compliance Board  
700 E. Warm Springs Road, Suite 100  
Las Vegas, Nevada 89119

Re: Support for NCCR 12 – Option C

Dear Chair Guzman Fralick and Members of the CCB:


Clark Natural Medicinal Solutions LLC submits this letter of support for the proposed regulation language contained in NCCR 12.065 - Option C.

As the CCB materials reflect, there is no scientific data of a consumer having an adverse reaction from cannabis, which has been decontaminated (post-harvest) using a CCB approved process. Like the CCB, cultivators have a vested interest in ensuring the quality and safety of our products. This is why growers spend significant time and resources investigating the best way to treat/decontaminate our cannabis. The CCB's approval of the various decontamination processes is also what we and consumers rely on as confirmation that they are safe. For this reason, Clark Natural Medicinal Solutions LLC strongly urges the CCB to support a process where cultivators provide information with their product when transferred to another cannabis establishment, similar to what is commonly known as a "soil amendment.". Specifically, the language would confirm that a CCB approved process was used and include a link to the list of approved processes. By doing so, it lessens the burden on cultivators and retailers and provides a means to which consumers can access valuable post-harvest information, including but not limited to confirming the CCB's approval of the treatment process used.

Regulations should not create new standards for licensees, which the Legislature has not otherwise required by law. For these reasons Clark Natural Medicinal Solutions LLC asks that Option C be adopted.

Thank you for your consideration of my comments and recommendations.

Sincerely yours,

DocuSigned by:  


Pejman Bady, Member  
Clark Natural Medicinal Solutions, LLC



June 21, 2024

Adriana Guzman Fralick, Chair  
Nevada Cannabis Compliance Board  
700 E. Warm Springs Road, Suite 100  
Las Vegas, Nevada 89119CC

Re: Support for NCCR 12 – Option C

Dear Chair Guzman Fralick and Members of the CCB:

Clark NMSD LLC submits this letter of support for the proposed regulation language contained in NCCR 12.065 - Option C.

As the CCB materials reflect, there is no scientific data of a consumer having an adverse reaction from cannabis, which has been decontaminated (post-harvest) using a CCB approved process. Like the CCB, retail and consumption lounges have a vested interest in ensuring the safety of our consumers. The CCB's approval of the various decontamination processes is also what retail and consumption lounge operators, and our consumers rely on as confirmation that products are safe. For this reason, Clark NMSD LLC strongly urges the CCB to support a process where cultivators or producers provide information with their products when transferred to a retail or lounge operator, similar to what is commonly known as a "soil amendment". Specifically, the disclosure would confirm that a CCB approved process was used and include a link to the list of approved processes. By doing so, it lessens the burden on retail and consumption lounge operators from a labeling perspective and provides a valid means by which consumers can request access to valuable post-harvest information at our locations, including but not limited to confirming the CCB's approval of the treatment process used. This is consistent with a consumer's right to access pre-harvest treatment information included in the "soil amendment."

Regulations should not create new standards for licensees, which the Legislature has not otherwise required by law. For these reasons Clark NMSD LLC asks that Option C be adopted.

Thank you for your consideration of my comments and recommendations.

Sincerely yours,

DocuSigned by:

Pejman Bady, Member  
Clark NMSD LLC



Clark NMSD, LLC P.O BOX 6255 Pahrump, NV 89041



June 20, 2024

Adriana Guzman Fralick, Chair  
Nevada Cannabis Compliance Board  
700 E. Warm Springs Road, Suite 100  
Las Vegas, Nevada 89119

Re: Support for NCCR 12 – Option C

Dear Chair Guzman Fralick and Members of the CCB:


Nye Natural Medicinal Solutions LLC submits this letter of support for the proposed regulation language contained in NCCR 12.065 - Option C.

As the CCB materials reflect, there is no scientific data of a consumer having an adverse reaction from cannabis, which has been decontaminated (post-harvest) using a CCB approved process. Like the CCB, cultivators have a vested interest in ensuring the quality and safety of our products. This is why growers spend significant time and resources investigating the best way to treat/decontaminate our cannabis. The CCB's approval of the various decontamination processes is also what we and consumers rely on as confirmation that they are safe. For this reason, Nye Natural Medicinal Solutions LLC strongly urges the CCB to support a process where cultivators provide information with their product when transferred to another cannabis establishment, similar to what is commonly known as a "soil amendment." Specifically, the language would confirm that a CCB approved process was used and include a link to the list of approved processes. By doing so, it lessens the burden on cultivators and retailers and provides a means to which consumers can access valuable post-harvest information, including but not limited to confirming the CCB's approval of the treatment process used.

Regulations should not create new standards for licensees, which the Legislature has not otherwise required by law. For these reasons Nye Natural Medicinal Solutions LLC asks that Option C be adopted.

Thank you for your consideration of my comments and recommendations.

Sincerely yours,

DocuSigned by:  


Pejman Bady, Member  
Nye Natural Medicinal Solutions, LLC

***Nye Natural Medicinal Solutions, LLC***  
**1620 West Charleston Park Ave. Pahrump, NV 89048**





June 26, 2024

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

Subject: Hearing on Proposed Changes to NCCR Regulation 12 (Options A, B & C)

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 Board meeting on June 28, 2024.

With respect to Options A, B, or C, we support Option C. We surveyed members on the three options proposed by the CCB and the majority of respondents favored Option C.

Option C is the best of the three options because it provides information regarding post-harvest treatment to consumers in a manner that is consistent with pre-harvest treatment. Additionally, Option C represents a compromise that takes into account significant differences in opinion across the industry.

We appreciate the Board and CCB staff's thoughtful consideration of this issue.

Respectfully,

A handwritten signature in black ink that reads "L. Martin". The signature is written in a cursive, flowing style.

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

SILVER BLACK ATTACK CULTIVATION  
NEVADA WELLNESS CENTER DISPENSARY  
NEVADA WELLNESS CENTER WEST DISPENSARY

June 27, 2024

**WRITTEN COMMENTS FOR NOTICE OF ADOPTION OF NCCR 12**

These written comments represent our collective thoughts of the staffs three options presented to the Cannabis Compliance Board.

I am representing, two dispensaries NWC and NWC West and one Cultivation Silver Black.

We are **opposed** to **Option A**; We are **opposed** to **Option B**.

We are in favor of **Option C** with some modifications for the following reasons.

We support the QR Code because the below items can be placed within the QR code.

- Green Radura symbol, the Notice language
- Soils Amendment
- The Certificate of Analysis
- A statement explaining the type of remediation that was done
- We would recommend the QR code be required on the Dispensary/Cultivation **websites**.

Thanks for your consideration,

Frank Hawkins

NWC, NWC West, Silver Black Cultivation,

Proposed Changes from CCB

~~Deleted~~

Our Revision

12.065 Cannabis post-harvest treatment or remediation ~~[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.]~~

1. A cannabis cultivation facility or cannabis production facility “must disclose” in writing to include Radura (See Below) with each lot or production run provided to a cannabis sales facility or cannabis consumption lounge, any process used which was approved by a Board Agent for the purpose of reducing or eradicating microbial contamination any time post-harvest, including the date and information on the approved process which can be provided via an electronic medium such as a QR code ~~or~~ and specifics on website ~~link~~
  - a. All such processes must be pre-approved by the appropriate Board agent.



2. Upon consumer request, a cannabis sales facility and cannabis consumption lounge must immediately provide the consumer or patient with the post-harvest disclosure provided by a cannabis cultivation facility or cannabis production facility pursuant to this section. The disclosure of the type of process used may be provided by hard copy, electronic means, or directly on the consumer facing label or package.
3. A notice that any treatments or remediation methods, laboratory results, and soil amendments ~~are~~ must be made available ~~upon request shall be posted~~ per the QR Code and ~~should be posted~~ conspicuously at each point of sale, including drive through windows, in at least 18-point font size, at all cannabis sales facilities and cannabis consumption lounges.
4. Nothing in this section prohibits any cannabis establishment from including on the label a disclosure that the cannabis or cannabis product has not been treated or remediated post-harvest.

**The QR Code should Contain the following:**

1. Green Radura Symbol with notice language (1)
2. Soils Amendment (3)
3. The Certificate of Analysis (3)
4. A statement explaining the type of remediation that was done (4)
5. QR Code will be on the dispensary/cultivation website if the Radura symbol is used. (1)

**BLUE BLUE DREAM CBD**  
**1G SHAKE**  
**17.227% CBD | Hybrid**  
**License#: 45779336388196486818**  
**This Product Contains Cannabis**  
**Keep Out of Reach of Children**  
**Must Be 21+**





## This product has **NOT** been radiated.

Radiated and non-radiated marijuana refer to two distinct methods of treatment applied to cannabis plants. Radiated marijuana, often termed “radiation sterilization,” involves exposing the cannabis to ionizing radiation such as gamma rays or electron beams. This process aims to eliminate microorganisms like bacteria, fungi, and insects that may be present on the plant material. Proponents argue that radiated cannabis is safer in terms of microbial contamination, particularly for individuals with compromised immune systems or those sensitive to pathogens.

On the other hand, non-radiated marijuana refers to cannabis that has not undergone radiation sterilization. Instead, non-radiated products are typically treated through methods such as heat pasteurization, ozone treatment, or simply rigorous quality control measures during cultivation and processing. Advocates of non-radiated cannabis argue that this preserves the natural integrity and potentially beneficial microbial content of the plant, which they believe contributes to the overall effects and flavor profile.

The debate between radiated and non-radiated marijuana centers on safety, quality, and consumer preference. Regulatory bodies in some regions require radiation sterilization for medical cannabis to ensure microbial safety, while others allow non-radiated products under stringent quality control.

Consumers often choose based on their health concerns, belief in natural versus processed products, and accessibility of specific strains or products in their region. Both methods continue to evolve alongside advancements in cannabis cultivation and processing technologies.

Sale!



Home / FLOWER / 28 Grams / 28G SHAKA ZULU 15.07% THC  
SATIVA FLOWER SILVER BLACK ATTACK CULTIVATION



## 28G SHAKA ZULU 15.07% THC SATIVA FLOWER SILVER BLACK ATTACK CULTIVATION

~~\$200.00~~ **\$180.00**

3.5G SHAKA ZULU 15.07% THC SATIVA FLOWER SILVER BLACK  
ATTACK CULTIVATION

LIMO 2.97MG, MYRC 2.94MG, CARY 2.67MG



[Click Here For Health Information](#)

- **Methods used in determining the impact on a small business**

The Agency used informed, reasonable judgment in determining that there would not be an impact on small businesses due to the nature of the regulation changes. The proposed permanent regulations make minor changes to requirements already established and in place by license holders. The Agency analyzed the written responses from the Small Business Impact Survey, public comment from the January 31, 2024 solicitation of input meeting, and public comment from the workshop held May 31, 2024 to determine the likely impact of the proposed permanent regulations on small businesses. This analysis included categorizing responses to identify themes and the frequency with which impacts were named. The Agency also looked at issues named with less frequency but could potentially have impact. The Agency has determined that there will be no adverse impacts to small businesses after making these revisions.

- **Estimated economic effect of regulation on businesses and the public**

a. Adverse and beneficial effects

The Agency finds that the proposed changes to NCCR 12 will have no adverse economic effect on small business. The changes make updates to existing regulations **and lessen requirements** upon small businesses in a manner that would not impose substantial burdens. **The Agency anticipates that those cannabis businesses that may be impacted will realize the beneficial economic impacts by the streamlined labeling requirements made by the updated regulations.**

**This is not true because we still have to do the same type of process. The public benefit outweighs the extra cost.**

b. Immediate and long-term effects

The proposed permanent regulation does not present any reasonable, foreseeable, or anticipated immediate or long-term economic effects on small businesses or the **public**.

**If the board approves option C, we agree that there are long term economic benefits for the public.**

- **Cost for enforcement of the regulations**

The proposed permanent regulations present **no significant foreseeable or anticipated cost** or decrease in costs for enforcement. The proposed changes merely make minor updates to regulations that are already in effect.

**NCCR 12.065 is not a minor change and will have foreseeable costs that do not outweigh the public benefit of public knowledge**

- **Overlap or duplication of other state or local governmental agencies**

The proposed permanent regulations do not overlap or duplicate any regulation of other federal, State or local governmental entities, but does reference regulatory authority granted by NRS 678A through NRS 678D.

- **Regulation required by federal law**

Not Applicable

- **More stringent than federal regulations**

The Department is not aware of any similar federal regulations of the same activity in which the state regulations are more stringent.

**The FDA Requires certain warnings on edible products and the CCB should do the same with edible and smokeable products in Nevada.**



June 27, 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 for 6/28/2024

Esteemed Members of the Board and CCB Staff,

The [Small Business Impact Survey](#) summary for the May workshop stated that “*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.*”

Our association agrees with this statement and stands behind our [previous public comment](#) submitted for the May workshop on Regulation 12.

**On behalf of the Chamber of Cannabis and its Commerce Committee, we urge the CCB to vote to adopt Option A as written:**

***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.***~~

**Option B:** Since NCCR 12.065 was introduced in 2020, the language, radura symbol, and singular focus on radiation treatment have been significant points of contention. Option B does not address these objections and does not account for other treatment methods for reducing or eradicating microbial contamination.

**Option C:** Option C obfuscates key information for medical patients and consumers by not requiring post-harvest treatment methods to be included on the labels. It misplaces the





responsibility of sharing this information on cannabis sales facilities, lounges and consumers rather than the licensees that are choosing to use these treatment methods.

Option C also creates an unnecessary burden for cannabis sales facilities by requiring notices at every point of sale and would require additional revisions to Regulation 4 to address non-compliance with this regulation.

**Option A is the best path forward;** it addresses the concerns raised in the 2020 petition filed on NCCR 12.065 while providing the level of transparency that medical cannabis patients and advocates have repeatedly requested.

This comment is reflective of the input we have received from our members and what has been discussed by the Commerce Committee.

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As a 501(c)6 non-profit industry trade association, the [Chamber of Cannabis](#) exists to represent the interests of our members. We are dedicated to advocating for sustainable business opportunities, restoring justice, and positively impacting our community.

All businesses and individuals are welcome to join our association and, as members, have the opportunity to impact the growth, sustainability, and excellence of the cannabis industry through committee participation.

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)