

**Nevada Cannabis Compliance Board**  
**Regulatory Workshop**  
**SB 157 – Regulations 1, 10, 11**  
**March 3, 2026**  
**Minutes**

The Nevada Cannabis Compliance Board (CCB) held a public workshop at Nevada Legislative Counsel Bureau, 2120 Amigo Street, Room 6, Las Vegas, Nevada beginning at 9:00 a.m. on March 3, 2026.

**Deputy Director Michael Miles called the meeting to order.**

Division Chief – Health & Safety Kara Cronkhite, and Laboratory Compliance Supervisor Lynette Kogler were present on behalf of the CCB in Las Vegas.

Deputy Director Miles stated that this is the second workshop on Senate Bill 157, specifically covering regulations 1, 10 and 11.

Instructions to join the meeting via Zoom for public comment were read aloud.

**I. Public Comment**

There were no public comments unrelated to SB 157 in Las Vegas or online.

**II. Proposed Amendments and additions to Nevada Cannabis Compliance Regulations 1, 10 and 11.**

Deputy Director Miles advised that discussion is open for regulations 1, 10 and 11 and asked Kara Cronkhite, Division Chief – Health & Safety to summarize each of the proposed changes to the regulations.

Chief Cronkhite stated copies of the ASTM D8334 standards and other standards referenced in the proposed regulations are available to view at the Cannabis Compliance Board (CCB) offices in Carson City and Las Vegas.

Ms. Cronkhite summarized changes in regulations 1, 10 and 11:

**Regulation 1:** Language was removed because it exists in statute and the removal ensures there are no redundancies.

**Regulation 10:** Sections 4(a) and (b) were added.

**Regulation 11:** Proposed language was changed as requested during prior public comment: specific requirements were added for cultivators, clarifying language was added to 11.030(15). Additionally, CCB is hopeful that NCCR 11 will be adopted and the phrase “as adopted by reference” will likely be added to Section 61.

Chief Cronkhite said CCB understands that sixty-gram samples should be homogenized prior to separating each twenty-gram section and explained that mixing is acceptable and grinding is not required. Clarifications will be provided. She noted there were no changes made to 11.070 but a typo will be corrected. Specific listed requirements for aseptic sampling techniques will be removed because ASTM D8334 requirements must be followed per SB 157 and aseptic sampling is included in ASTM.

Deputy Director Miles opened discussion about Regulations 1, 10 and 11.

Adam Fulton of Jennings & Fulton, spoke on behalf of 374 Labs, G3 Labs, MA and Associates, ERP, NV Cann Labs, RSR Analytical Laboratories and DPL Nevada dba Digipath Labs. He thanked CCB staff for working through industry concerns and summarized the laboratories position on proposed legislation, stating that lot size under NCCR 1.125 is a concern, noting the proposed draft removes it entirely, creating a conflict with SB 157 Sec. 38, which defines “lots” as fifteen pounds for flower, forty-five pounds for trim and one hundred-fifty pounds for wet material.

Mr. Fulton noted the sample size deficiency under NCCR 11.050 and reminded CCB that he provided a table explaining how to get to scientific viability based on lot size. He discussed requirements under the proposed regulation and said the flat sample approach is scientifically invalid due to the requirement that each component must maintain an independent, statistically valid sampling rate. He suggested updating the table, the required scientific column based on the information he provided and said sample sizes must scale proportionally to lot size.

He acknowledged the homogenization concern was addressed and stated it is important to note it works for the current five-pound lot requirement, but for a fifteen-pound lot, the sampling rate will not work due to the measured statistics and analytical event. Mr. Fulton requested an update pursuant to the paper he provided and said it is important to cite to the correct version of the ASTM standard. He asked for that information to be added back to NCCR 10.075, 11.030 and 11.070 and said it was previously resolved.

Mr. Fulton expressed concern on behalf of the laboratories regarding 11.070(6), stating labs are concerned there is no mechanism to return a sample, and if it is returned, sold and there is an issue with it, who is responsible or liable?

Chief Cronkhite assured Mr. Fulton that CCB worked closely with Metrc on implementation and said she understands the concerns about liability.

Will Adler, from Silver State Government Relations, representing GTI noted this is the second workshop on SB 157 and the workshops are designed to address one thing: lot size, poundage and amount. He said additional regulatory add-ons do not address the core issue. Mr. Adler agreed with a sixty-gram allotment and said other ASTM standards should be addressed during a separate workshop. He acknowledged Mr. Fulton’s concern regarding returned samples and potential liability and said the focus should remain on SB 157, lot size and testing, rather than expanding the scope. Mr. Adler suggested removing references to 10.075 and any secondary policies which do not address gram count for testing, retention and process, and said 11.030 should be discussed further.

Chief Cronkhite discussed proposed language:

**NCCR 10.075:** The proposed language is from ASTM D8334 / D8334M and SB157 must align with that language.

**NCCR 11.030(15):** Language was added to clarify the regulation as requested during public comment. It is likely that previously stricken language, "...the chain of custody and sample identification requirements of..." and "as adopted by reference in section 61 of this regulation; and..." will be added back to this regulation because it will soon be adopted.

Deputy Director Miles noted that prior workshop discussions requested inclusion of this language. He provided additional information stating that SB 157 does not limit following the ASTM standard to lot-size, rather it says to align with the ASTM standard, which is the statute and the law CCB follows.

Chief Cronkhite stated there are statutory deadlines that must be met when a statute is passed, and there is limited time to adopt regulations following statutory change.

Layke Martin, of Nevada Cannabis Association, shared the primary concern aligns with Mr. Adler's comments on SB 157. Ms. Martin summarized the issue and said there is a lot of engagement on the issue and regulations should work for cultivators and laboratories. She said the workshops should be comprehensive and is concerned about going through the required process with the prospect of the legislative commission rejecting the proposed language.

Ms. Martin read a Legislative Counsel Bureau (LCB) opinion which said ASTM standards are provided as an option for CCB to follow and align with and that CCB can make decisions with respect to adopting the ASTM standard.

Ms. Martin mentioned the sixty-gram homogenized potential addition to the regulation. Deputy Director Miles said CCB believes the ASTM standard states that sixty grams must be homogenized prior to pulling twenty grams, and it will be spelled out directly in the regulations. Ms. Martin said there would be a cost difference if sixty grams were homogenized, made unreturnable and unsellable, rather than testing twenty grams and retaining forty grams.

Chief Cronkhite restated that "homogenizing" does not mean "grinding and mixing together" rendering it unusable; it means "mixing together" and the final language will be very clear.

Ms. Martin spoke on behalf of labs and cultivators and said the primary concern is about transportation, storage, handling and reliability of the forty grams retained, and asked if a party is holding 40 grams and then it is returned, can it be resold? She acknowledged documentation requirements are provided in Section 6 and said cultivators are concerned with the requirement they must hand over proprietary information to labs, if this is not actually required by the ASTM standard.

Will Adler said he has an LCB opinion which states the ASTM standards do not have to be adopted in entirety, and he agrees the legislature only spoke regarding lot sizes and gram count, not pesticides or testing. He expressed concern that if the proposed changes are expanded beyond that scope, it will be rejected during the next legislative session.

Deputy Director Miles explained that the language “aligned with SB 157” is in statute and asked what Mr. Adler agrees with in the ASTM standard, and it is not CCB’s bill. Mr. Adler said “aligned with” already existed in regulatory language and was cited.

Chief Cronkite explained that ASTM D8334 was adopted by reference in relation to aseptic sampling techniques and chain of custody sample identification requirements.

Mr. Adler restated his response that nothing other than lot size and gram counts should be added to SB 157 because the scope was narrow, and ASTM standards should be discussed separately in future workshops. He agrees with the homogenization standards but said it is necessary to know who retains and has custody and agrees with the twenty-gram minimum sample size requirement. He stated his belief that it is not necessary for the ASTM standards to be followed in their entirety because it does not say “adopt in its entirety” and said an LCB opinion states CCB can choose to align with the standards as they see fit. He asked for the topic of this workshop to be narrowed and to discuss standards later.

Deputy Director Miles responded that CCB understands Mr. Adler’s position and said the bill requires aligning with the standards.

Additional discussion occurred regarding ASTM standard sample sizes, increased lot size requirements greater than five pounds, and the introduction of ASTM standards. Opinions on differing local jurisdictions and flexibility in standards and process were voiced.

Chief Cronkhite specified that ASTM states the laboratory collecting the sample is to homogenize sixty grams at the laboratory, not where it is picked up. There is nothing stated about an allowance to return it, although there is retention and retesting which implies the laboratory keeps the sample.

Deputy Director Miles asked for additional public comments.

There were no additional public comments on proposed regulation changes to NCCR 1, 10 or 11.

### **III. Public Comment.**

Deputy Director Miles opened Agenda Item III and asked for public comment in Las Vegas.

There were no additional public comments in Las Vegas or online.

### **IV. Adjournment**

Meeting adjourned at 9:45 a.m.