



We Are The Washington Cannabis Industry

October 8th, 2024

TO:

Cassidy West
Policy and Rules Manager
Washington State Liquor and Cannabis Board

CC:

Justin Nordhorn
Will Lukela, Director

FROM:

Vicki Christophersen
Executive Director
Washington CannaBusiness Association

Dear Ms. West,

As you know, the Washington CannaBusiness Association (WACA) represents Washington's licensed and regulated cannabis businesses of all kinds. As the longest-established trade association for cannabis businesses in the state, we are committed to establishing a safe, quality-controlled, fully regulated system that works to keep cannabis away from kids while keeping an eye on the horizon for what's next. We appreciate the opportunity to provide feedback on the CR-102 updating regulations regarding vendor, educational, and internal quality samples in WAC 314-55-096. WACA was happy to submit the petition for rulemaking in July of 2022 on behalf of our members who have expressed for years the need to update these rules.

Our members have had time to review the CR-102 language and have the following suggestions for your consideration.

1. Internal quality control sample limits need to account for varying license tiers and growing methods.
 - a. The current language in the CR-102 limits internal quality control samples for producers to 14 grams per harvest per quarter. The proposed limits are far too restrictive, especially for an outdoor grow that could potentially do only one harvest a year. Additionally, "harvest" is defined differently depending on the ruleset and we have seen confusion on whether the word "harvest" is being used as a noun or a verb. WACA suggests that the internal quality control samples for producers be available for each strain and harvest. Indoor grows, for example, are typically growing plants on a 12 week cycle which means that there are constantly new plants being cut down, dried and cured. It is necessary to sample each of these for quality control. A grow may harvest

multiple strains on the same day, so it needs to be clear in the rule that you are allowed to sample each strain.

2. Internal quality control sample limits should be based on employee count
 - a. WACA recognizes that quality control samples are intended to be used as such and are not to be used as employee compensation. However, to have a numerical limit on quality control samples that applies to all producers and processors regardless of size is unworkable because there is such a vast difference between a small tier 1 and a large tier 3. Furthermore, it does become a matter of employee fairness. WACA recommends adjusting the limits for internal quality control samples to allow for each employee to sample new batches and/or harvests per strain. This approach would scale the allotted sample amount based on the size of the operation and also allow equal access to all employees, making for better quality control.
3. Producers and processors need to be able to sample products in the research and development phase
 - a. The current restrictions for internal quality control samples do not allow enough flexibility for producers and processors to sample products they are not currently selling to retailers but are in the process of developing. WACA recommends adding a new section that clearly states producers and processors are allowed to conduct quality control sampling to their employees for products that are under development and not currently being sold to retailers.

Thank you for your consideration, we look forward to continued work on this ruleset to streamline and simplify sampling regulations for legal licensed businesses.

Sincerely,
Vicki Christophersen
WACA Executive Director