



## MEMORANDUM

TO: Marijuana Control Board

DATE: November 7, 2023

FROM: Kristina Serezhenkov, Regulations  
Specialist

RE: Regulations Project- Packaging  
Variety Packs

The board approved the draft regulations for initial Law review at the August, 2023 meeting. Upon the Department of Law's approval, the draft was sent out for official public comment with the comment period closing 11.6.2023. Comments were received and are attached.

Options for the board:

- Move to adopt and send to Law for final review.
- Move to amend and adopt and then send to Law for final review.
- Move to send back to staff for more work
- Close the regulations project

(Words in boldface and underlined indicate language being added; words [CAPITALIZED AND BRACKETED] indicate language being deleted.)

3 AAC 306.565 is amended by adding a new subsection to read:

(f) A marijuana product manufacturing facility may create a variety pack with one or more products. The single packaged unit requirement under 3 AAC 306.560(2) applies to each product inside the variety pack. All required labels under 3 AAC 306.570 must be affixed to each product inside the variety pack as well as the exterior of the variety pack. The total amount of THC inside the variety pack may not exceed the limits set out under 3 AAC 306.355. (Eff. 2/21/2016, Register 217; am 2/21/2019, Register 229; am 3/13/2020, Register 233; am 4/16/2023, Register 246; am \_\_\_\_ / \_\_\_\_ / \_\_\_\_\_, Register \_\_\_\_\_)

**Authority:** [AS 17.38.010] AS 17.38.150 [AS 17.38.200]  
AS 17.38.070 AS 17.38.190 [AS 17.38.900]  
AS 17.38.121

**From:** [Ryan Tunseth](#)  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** AMIA Regulation Comments  
**Date:** Monday, November 6, 2023 2:29:07 PM  
**Attachments:** [AMIA Packaging REG COMMENT 11.6.23.pdf](#)  
[AMIA SEEDS & CLONES REG COMMENT 11.6.23.pdf](#)

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AMCO / MCB,

Please find the attached comments from the Alaska Marijuana Industry Association (AMIA) related to proposed regulations:

- Introduction of seeds and clones
- Changes to packaging of marijuana products.

Thank you,

AMIA Board of Directors

Date: 11/06/2023

To: Alaska Marijuana Control Board (MCB)  
[amco.regs@alaska.gov](mailto:amco.regs@alaska.gov)

From: Alaska Marijuana Industry Association (AMIA)  
[president@alaskamia.org](mailto:president@alaskamia.org)



Re: Comment on MCB proposed changes to regulations in Title 3, Chapter 306.565 of the Alaska Administrative Code dealing with marijuana products.

Dear Members of the Board,

We do not believe that this regulation change is needed. Currently regulations already exist for variety packs. The proposed regulation redundantly cites requirements for manufacturers which they are already required to follow (3 AAC 306.560(2), 3 AAC 306.570 and 3 AAC 306.355).

Variety packs are currently allowed in regulation and are required to maintain all of the necessary labeling. We are not clear as to what this regulation change attempts to accomplish and would respectfully request that it be removed from consideration.

Thank you,

AMIA Board of Directors  
Ryan Tunseth, President.

## Comments on: NOTICE OF PROPOSED CHANGES TO PACKAGING OF MARIJUANA PRODUCTS IN THE REGULATIONS OF THE MARIJUANA CON BOARD

Submitted By	Comment
11/3/2023 8:58:40 AM Kerby Coman <a href="mailto:kerby@greendegree.net">kerby@greendegree.net</a> Wasilla, AK, US <b>Anonymous User</b>	I am in support of this regulation project.

**From:** [Barret Goodale](#)  
**To:** [CED AMCO REGS \(CED sponsored\)](#)  
**Subject:** Public Comment on Variety Packs  
**Date:** Wednesday, October 11, 2023 11:21:25 AM

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Dear Members of the Board,

I believe this project was a waste of the staff's time. The project that was directed to staff was one that showed the board's unfamiliarity of the regulations. As you can see from what staff prepared, the regulations already existed for variety packs. The proposed regulation states that for a variety pack a manufacturer must follow 3 AAC 306.560(2), 3 AAC 306.570 and 3 AAC 306.355. Manufacturers already have to follow these regulations. The only addition staff was able to recommend in this situation was the addition of 3 AAC 306.570 applying to the exit packaging. This, the only actual change to the regulations, is redundant and makes no sense. For instance, if a retailer sells three different 10 packs of Gummies from a single manufacturer and places it in an exit bag there is no regulation requiring that to have the labeling required under 3 AAC 306.570 to be placed on the exit packaging. However, under this new regulation if the manufacturer placed these same three 10 packs of gummies into an exit package before going to the retailer this new change would require additional labeling on the exterior of the exit packaging. The consumer receives the exact same product packaged in the exact same way, but one way requires the exit packaging to have additional labeling and the other does not.

Variety packs already have the necessary labeling requirements within the regulations. This regulation does not do anything other than make two different requirements for the same items in the same packaging.

Thank you,

**C. Barret Goodale**  
**GOOD Cultivation Manager**  
907-699-9478

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Alaska Marijuana Industry Association member

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