

Date: 8/15/2023

To: Alaska Marijuana Control Board
(MCB) marijuana@alaska.gov

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



Re: General comment for the Alaska Marijuana Control Board – August 2023 Meeting

The Alaska Marijuana Industry Association (AMIA) would like to take a moment and thank the staff and Director Wilson for utilizing the term cannabis in the new online licensing system, AK-ACCIS (Alaska Alcohol & Cannabis Control Information System). This is in line with industry terminology and scientifically accurate. We also want to recognize the Alcohol & Marijuana Control Office (AMCO) for supporting our industry and recognizing the misunderstanding of renewal fee structures on the website that caused confusion within the industry and taking the time to refund these late application fees due to the confusion.

While AMCO and the Marijuana Control Board (MBC) have moved forward in cannabis industry enforcement, we are still all waiting in anticipation for the Division of Agriculture to release new industrial hemp regulations. Public comment closed June 14th, 2023, and no updates have been announced. We hope to see these regulatory changes and for the Memorandum of Understanding be utilized in the enforcement of intoxicating hemp products that we are seeing on our Alaskan market.

At the last MCB meeting, the AMIA spoke on the subject of initial plant tagging heights, package tags, and creating new batch groups that are more sustainable. The board moved forward by creating a regulations project on this topic. However, we have not seen forward movement on this project, and thus we want to remind the board that this is a project that can provide real improvements to our industry and to the public. Our industry creates an unacceptable amount of waste that affects Alaskans and our future. This waste also affects commerce within the state by placing a large financial burden on our cultivators to uphold Metrc requirements that do not appear to improve public health or safety. We ask that the board move this project forward and create more efficient and less burdensome plant tracking regulations. The AMIA is here to support - we are eager and excited to provide assistance on this regulations project.

Finally, the AMIA would like the board to consider a Chapter 306 rewrite. The cannabis regulations were written at a time when there was limited to no data about how the market would operate, what the actual threats to the public health and safety were, and where the pain-points for licensed businesses would be. Now, with years of experience and data, the AMIA feels that a complete rewrite would be the most effective way to update the regulations. The Alcohol industry just finished the Title 4 rewrite, with success, and AMIA feels there is strong motivation to consider a Chapter 306 rewrite. The cannabis regulations continue to be imperfect, with many issues left unaddressed and the changes that have been made thus far only capture a small fraction of the changes that we feel are necessary to make our industry safer, more efficient, and more sustainable. Some regulations have been written in a manner that is confusing or contrary to another regulation such as the overlapping premises issue. The AMIA would like to ask the MCB and AMCO if there is an interest for such an undertaking. If so, we feel that the Director currently serving you would be a great candidate to uphold the board's wishes and prepare a draft Chapter 306 rewrite for the board's review. The AMIA would be in full support of Director Wilson taking on the Chapter 306 rewrite project if such an undertaking was the desire of the MCB and within the capacity of AMCO.

In closing, we want to express our gratitude for all the hard work done by AMCO licensing and enforcement staff. The renewal processes this year has been considerably faster than years prior. This cannot have been done without great leadership and a team that wants to create more efficient processes. We see your hard work and improvements and are proud to express our gratitude and appreciation for everything you do for our industry and the residents of the State of Alaska.

Respectfully,

A handwritten signature in blue ink that reads "Ryan Tunseth". The signature is written in a cursive, flowing style.

AMIA Board of Directors
Ryan Tunseth, President