



## ADVISORY

Date: April 15, 2020

To: All Marijuana Establishment Licensees

From: Alcohol Marijuana Control Office

Reference: ADVISORY 3AAC 306.7509(a) MCB CLARIFICATION

The Marijuana Control Board met on April 11, 2020 and April 15, 2020 to specifically discuss the ongoing COVID-19 pandemic and the Board's ability to minimize the spread of COVID-19. The Board is considering emergency regulations to achieve these objectives. In the meanwhile, the Board concluded that 3 AAC 306.750 will be interpreted to permit the following.

1. 3 AAC 306.750(a). Transportation (a) Marijuana or a marijuana product may only be transported to a licensed marijuana establishment by a licensee or an agent or employee of a licensee.

3 AAC 306.750(a) will be interpreted to permit the handoff of marijuana or marijuana products between transporters, so long as each transporter is an agent or employee of a licensed marijuana establishment and each transporter holds a marijuana handler permit. In each case, the handoff and change in agents or employees must be documented in the transport manifest accompanying the marijuana or marijuana product and in the marijuana inventory tracking system. As an example, as long as properly documented, a transporter of a marijuana cultivation facility may hand off marijuana or marijuana product to a transporter of a marijuana retail store at a location outside the premises of the retail store if doing so minimizes the opportunity for community spread of COVID-19. The licensees do so at their own risk that the marijuana or marijuana product appropriately fills the order.

These interpretations shall be in place during the length of the COVID-19 Public Health Emergency, as determined by the Governor of the State of Alaska unless terminated by the Marijuana Control Board on an earlier date or otherwise enacted in emergency or permanent regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Glen Klinkhart".

Glen Klinkhart  
Interim Director  
Alcohol Marijuana Control Office