PROPOSED REGULATIONS - ON SITE CONSUMPTION
Comments Received During Public Comment Period
July 13, 2016 through August 22, 2016

Date Received	Comment Submitted By	Organization	Section Addressed	Comment to be Considered	**Changes Made Based on Comment** (change made / no change)
7/16/2016	Robert Shear	n/a	306.645	Please consider or forward a question regarding this subject currently in Public Comment status until August 21, 2016; Does the Alaska Administrative Code address, or does the State intend to address pesticide use for cannabis after they get through legislating testing requirements? I'm presently reviewing the last month update to the Colorado Pesticides Applicator Act 35-10-117(1)(B) C.S.R. in relation to cannabis. https://www.colorado.gov/pacific/agplants/pesticide-use-cannabis-production-information	
7/21/2016	Robert Shear	n/a	306.645	I find this section of the draft regulation incomplete in that testing only for THC, CBD, and CBN leaves many qualities unidentified that could help form an accurate characterization of the product being offered for sale. Cannabis name brands are not protected by trademark or patent law. Strains naturally produce genetic variance. Cloned plants can vary chemically from harvest to harvest simply due to changes introduced in the growing environment. The terms Indica, Sativa, and Hybrid are an empty promise to the consumer. This comment suggests improvements to the Testing Requirements to ensure the public is informed when considering to purchase retail cannabis. In the draft regulation, the use of the term "potency" is misleading. To a recreational user the term refers to those chemicals that produce psychoactivity. However, the draft regulation includes CBD which is not psychoactive and actually interferes with psychoactivity. Also it omits THCV/THCV-A that, in addition to the listed THC and CBN, binds with the human endocannabinoid system CB1 receptor responsible for producing euphoria. To a medical user or a discerning recreational user, there are many more chemical characteristics that identify potency outcomes other than euphoria. Testing (and product labeling) need to include additional information so the consumer can form an expectation of the products' effect on their body upon consumption. Respectfully, request that the board consider re-phrasing 3 AAC 306.645(b) as suggested below; (1) Chemical testing is required on cannabis bud and flower, cannabis concentrate, and a cannabis product, as follows; (A) the tests required must at least determine the concentration in percentage of total weight for the following cannabinoids; THC, THCA, THCV, THCVA, CBN, CBD, CBC, and CBG. Terpene profile testing will also be performed on all bud and flower used for retail or raw material manufacturing to further ascertain the chemical signature of the product. Terpene profiling shown in percentage of total weight will include but not be limited to; myrcene, linalool, eucalyptol, terpinolene, humulene, limonene, pinene, caryophyllene, and hashishene. I hope you will carefully consider this comment. Thank you for your time and effort to help form regulations that promote the safety of this new industry.	
8/4/2016	Justin Roland	n/a		I'm very concerned with the current benzene testing limit at 0.25 I have worked in the cannabis industry for quite some time now and this level will NOT allow any test to be passed on anything extracted by butane which is one of the more commonly used method of extraction. This level needs to be at least 1ppm. If you would look at all the other states that have legalized cannabis there benzene level is set at 1ppm. I find it very odd that ours is set at 0.25ppm, this would completly block and not allow anyform of butane to pass a test and would fail alot of cannabis concentrate or edible product that would be perfectly fine for the market. Please allow the change in the Benzene testing section going from 0.25ppm to 1ppm this will help a starting industry to succeed. Thanks Justin R.	
8/21/2016	Brian Coyle	AK Green Labs LLC	365	Hi Joe, Further to the Board's request for public comments, I have some below and in the attached file. 1. I support raising the allowable concentration of benzene from 0.25 ppm to 1.0 ppm. I also support the modifications proposed for the maximum allowable potency of individually packaged edibles. 2. 3 AAC 306.555. Production of marijuana concentrate specifies Propane as an acceptable solvent for producing marijuana concentrate. However, the list of solvents that need we need to test for does not include Propane. Therefore, I recommend that Propane be added to the list of Residual Solvents that must be tested and the acceptable level be set at 1000ppm. This corresponds to the Workplace Exposure Limits set for Propane by national safety organizations and is in line with the levels set for the other solvents. OSHA: Permissible Exposure Limit (PEL) is 1,000 ppm averaged over an 8-hour work shift. 29 CFR 1910.1000 Table Z-1 NIOSH: Recommended airborne Exposure Limit (REL) is 1,000 ppm averaged over a 10-hour work sheet NIOSH Pocket guide - Propane 3. We respectfully request that CBN be removed from the list of cannabinoids required for potency analysis; reasons are presented in the attached document. Please let me know if you would like more information or to discuss any of this further. I would be happy to meet with you at your convenience. Request to Remove CBN from Potency Analysis Requirements AK Green Labs respectfully requests that CBN be removed from the list of cannabinoids that must be quantitated when measuring the potency of commercial marijuana and marijuana products. CBN is a non-psychoactive component and represents no threat to public health. Additionally, the natural concentration of CBN is very small (<<0.1%). This concentration increases gradually with time, through exposure to oxygen and to ultraviolet light. (Drug Enforcement analysts tried to use the concentration of CBN to estimate the age of seized cannabis product - though this turned out to be of little use.) It is important to note that removing CBN from the list of required cannabinoids would have no affect on public safety. As a benefit, removing CBN from the list of required cannabinoids would enable us to use newly developed systems to measure potency. New methods, such as infrared spectroscopy such as Steep Hill's QC2, are available that are less complex and require less equipment than chromatography, but they are not calibrated for CBN. If allowed, these systems are much more portable could be easily deployed at remote locations to measure the potency of cannabis. The histogram below shows the CBN content of 6,500 flowers analyzed by HPLC at Steep Hill Labs. It shows that >99% of the cannabis samples had a CBN concentration less than 0.25% and the average concentration value of 0.07%. (SEE ATTACHMENT) Histogram of CBN concentrations measured in 6,500 flower samples. Data is from flower sample tests performed by Steep Hill in its California, Washington, and Colorado laboratories using HPLC-UV-PDA methodology. Over 85% of flower samples contained too little to report (only trace amounts), and >99% of all samples tested had less than 0.25% CBN. (Note: Samples with very high values of CBN (>0.6%) were artificially induced by overexposure to UV radiation.)	Oppose