

From: [Alaska Online Public Notices](#)
To: [Samaniego, Joe P \(CED\)](#)
Subject: New Comment on NOTICE OF PROPOSED REGULATIONS REGARDING MARIJUANA TESTING FACILITY REQUIREMENTS, MARIJUANA CONTROL BOARD
Date: Thursday, July 21, 2016 10:48:09 AM

A new comment has been submitted on the public notice [NOTICE OF PROPOSED REGULATIONS REGARDING MARIJUANA TESTING FACILITY REQUIREMENTS, MARIJUANA CONTROL BOARD](#).

Submitted:

7/21/2016 10:48:08 AM

Robert Shears
rvshears@hotmail.com

Unknown location
Anonymous User

Comment:

Regarding proposed regulation for cannabis testing facilities
3 AAC 306.645(b)(1)(A) Potency Testing

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.

Sincerely,

Robert Shears
PO Box 2001
Barrow, Alaska 99723

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [Samaniego, Joe P \(CED\)](#)
Subject: New Comment on SUPPLEMENTAL NOTICE OF PROPOSED REGULATIONS REGARDING EXTENSION OF PUBLIC COMMENT PERIOD FOR MARIJUANA TESTING FACILITY REQUIREMENTS REGULATIONS MARIJUANA CONTROL BOARD
Date: Thursday, August 04, 2016 9:18:43 AM

A new comment has been submitted on the public notice [SUPPLEMENTAL NOTICE OF PROPOSED REGULATIONS REGARDING EXTENSION OF PUBLIC COMMENT PERIOD FOR MARIJUANA TESTING FACILITY REQUIREMENTS REGULATIONS MARIJUANA CONTROL BOARD](#).

Submitted:

8/4/2016 9:18:42 AM

Justin Roland
dreamgreenak@gmail.com

Unknown location
Anonymous User

Comment:

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 completely 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.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Robert Shears](#)
To: [Samaniego, Joe P. \(CED\)](#)
Cc: rvshears@hotmail.com
Subject: Question about proposed 3 AAC 306.645
Date: Saturday, July 16, 2016 10:04:17 PM

Standards and requirements for marijuana testing facilities

3 AAC 306.645 – Marijuana testing facility requirement amendments are proposed:

Mr. Samaniego,

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>

Respectfully,
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