From:	Barret Goodale
To:	Marijuana, CED ABC (CED sponsored)
Cc:	AMCO Admin (CED sponsored)
Subject:	Waste Holding Period
Date:	Thursday, February 01, 2018 12:10:40 PM

Dear Marijuana Control Board Members,

First, I would like to thank you for the time to speak during public comment during the last MCB meeting. In my comment, I addressed the sanitary concerns of holding cannabis waste for 3 days after it is created before being able to destroy it. In looking back to the MCB minutes from July 12-14, it appears the Chair of the Board indicated that waste does not need to be created before giving Director McConnell 3 days notice as seen by the following meeting minutes but is not perfectly clear.

"NEW STANDARD MARIJUANA CULTIVATION FACILITY APPLICATIONS A. License #10048: Tok Heavenly Cannabis, LLC TAB 26 Licensee: Tok Heavenly Cannabis, LLC Premises Address: MP 1308 Alaska Highway Tok, AK 99780 Local Government: No Local Government Joe Young, Patricia Young, licensees. Brandon Emmett moves to approve.

Springer seconds.

Jones: Does this building exist yet?

J. Young: Not yet.

Mlynarik: Are you grinding all the waste up?

P. Young: Using my technique the root balls decompose rapidly. Would it be okay to sterilize them?

Mlynarik: Just notify three days before you harvest.

Motion carries 5-0."

I am asking for clarification by the board in this matter. The way the regulations are written, the MCB regulations do not state that we must hold cannabis waste in our facility for three days after it's creation, nor do they state that we must report the weight or the room the waste was generated in. The regulations set by the MCB state that AMCO must be notified 3 days prior to the destruction of material. "(c) A marijuana establishment shall (1) in the marijuana inventory tracking system required under 3 AAC 306.730, give the board notice not later than three days before making the waste unusable and disposing of it;"

Currently, AMCO is requiring cultivators to generate the waste before weighing it and reporting the weight and room of origin to AMCO via email. The waste must then remain unadulterated for three days before being able to destroy it. This goes against Mlynarik's statement above and the written regulations. I would greatly appreciate clarification of the

boards stance on this issue.

Taking into consideration the written regulations and the previous Chair's comments in the meeting minutes, cultivators are only required to report that their will be a destruction event in three days. Could you please confirm this.

My concern is that bacteria, mold, viruses, and viroids can multiple at a dangerous rate in three days. The grinding process to destroy the waste three days latter can agitate and aid in the dispersal of the pathogens present on the material. notifying AMCO three days before the generation of waste and a destruction event would still meet the written regulations and allow cultivators to perform the basics of good agricultural practices and further implement integrative pest management, the most responsible form of pest management. I have attached photos of what can happen to plant waste in three days time. Plants produce enzymes and antibacterial compounds such as phytoalexins which can interrupt the growth of pathogens on the plant. Once the plant material has been removed from the plant, the production of those enzymes cease and the pathogens are no longer being inhibited. This leads to unrestricted growth of those pathogens. This is why best practice dictates that plant material is never to be left in a facility once detached from the plant.

At our facility we follow strict Integrative Pest Management (IPM) practices. However, being required to hold waste for three days, is contrary to that practice and will eventually cause the practice to fail. IPM is the only option other than traditional pesticide applications. If cultivators can not utilize the IPM practices fully due to the regulations, then the regulations are contributing to the use of traditional pesticides in the cultivation of cannabis in the state of Alaska. I do not believe that is desirable by consumers, responsible cultivators, the MCB, the DEC or AMCO.

I appreciate your time and efforts in this matter, and thank you for your reply in advance.

Sincerely and respectfully,

C. Barret Goodale
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