From:	Barret Goodale
To:	Marijuana, CED ABC (CED sponsored)
Subject:	Public comment pre-registration
Date:	Friday, January 19, 2018 1:55:37 PM

I have been encouraged by Cheif James Hoelscher to bring forth a solution to the issue being caused by holding cannabis waste for three days before destruction. I would appreciate the opportunity to make a public comment to the board concerning AMCOs enforcement of a three day holding period for waste. AMCO has asked for the weight of all waste to be reported to them via email including the room of origin of said waste. After notification has been sent, the cultivator must store it in an unadulterated form for three days after the notification before being permitted to destroy the waste.

First, I would like to request conformation that this is what the MCB intended when they adopted the regulations.

Secondly, this three day holding period is bad agricultural practice. Three days of holding waste allows for the propagation of mold, mildew and other pests and disease which may be present on the plant material. The plant material must then be destroyed through grinding as per regs. This would aspirate and spores or bacterial cells, viruses or viroids that could be present and spread the contaminants. The holding period of three days posses a public health threat. Furthermore, This eliminates the foundation of integrated pest management. This would result in the likely hood of more cultivators relying on pesticides.

I would like to request a way to get rid of the three day holding period. I am open to suggestions. However, Chief Hoelsher was adamant that I provide a solution. Therefor, I would like to propose that when weighing the waste, a photo could be submitted with the weight of the waste to insure that the waste to be destroyed is indeed waste and not becoming diverted product. Every facility has cameras so if AMCO had any concern they could review the footage.

Finally, I would like to point out that it was clarified to me that the three day holding period is due to the fact that AMCO doesn't work weekends. Perhaps another solution would be to only destroy waste on weekdays. That way AMCO would always be able to respond or come to inspect the waste without requiring it to fester for three days.

Thank you for your consideration.

Sincerely,

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