



## MEMORANDUM

TO: Mark Springer, Chair, and  
Members of the Board

DATE: August 15, 2018

FROM: Erika McConnell, Director  
Marijuana Control Board

RE: Regulations Project – Wholesale  
Concentrates to Retail

This proposed change would allow product manufacturing facilities and concentrate manufacturing facilities to send wholesale bulk packages of concentrates to retail stores for the retailers to sell the products deli-style to consumers. The proposal does not allow retailers to use the bulk concentrate to create a new marijuana product, such as a vape pen, a vape cartridge, caviar nugs, moon rocks, and the like.

Options for the board:

- Put out for public comment as written
- Amend and put out for public comment
- Send back to staff for revisions
- Close the project without action

Register \_\_\_\_\_, \_\_\_\_\_ 2018 COMMERCE, COMMUNITY, AND EC. DEV.

3 AAC 306.565(c) is amended to read:

(c) **Except as prohibited in 3 AAC 306.555(b)(2), a**[A] licensed marijuana product manufacturing facility may transfer marijuana [PRODUCTS THAT ARE NOT EDIBLE MARIJUANA PRODUCTS] **concentrates** to another licensed marijuana product manufacturing facility **or to a licensed retail marijuana store** in wholesale packages not to exceed five pounds. (Eff. 2/21/2016, Register 217; am. \_\_\_/\_\_\_/\_\_\_\_; Reg. \_\_\_\_\_)