



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Commerce, Community,
and Economic Development

ALCOHOL AND MARIJUANA CONTROL OFFICE
550 West 7th Avenue, Suite 1600
Anchorage, AK 99501
Main: 907.269.0350

MEMORANDUM

TO: Marijuana Control Board

DATE: August 6, 2020

FROM: Glen Klinkhart, Interim Director

RE: Cosmic Seaweed License # 19728 – THC Dog Treats
Marijuana Product Manufacturing Facility
262 Charles Way, Homer, AK 99603
City of Homer; Kenai Peninsula Borough

Members of the Board,

This subject as hand is the issue, the scope, and/or the oversight by the Marijuana Board as it pertains to edible THC infused treats for animals, specifically dog treats, as first proposed by Cosmic Seaweed in April of 2020 in their MJ-16 application.

Statute(s) and Regulations:

Sec.17.38.020. Personal use of marijuana.

*Notwithstanding any other provision of law, except as otherwise provided in this chapter, the following acts, **by persons 21 years of age or older**, are lawful and are not criminal or civil offenses under Alaska law or the law of any political subdivision of Alaska or bases for seizure or forfeiture of assets under Alaska law:*

(1) possessing, using, displaying, purchasing, or transporting marijuana accessories or one ounce or less of marijuana;

(4) consumption of marijuana, except that nothing in this chapter permits the consumption of marijuana in public; and

*(5) **assisting, aiding, or supporting another person who is 21 years of age or older in any of the acts described in (1) - (4) of this section.***

3 AAC 306.990. Definitions

(27) “marijuana infused product”(A) means a product that contains marijuana or marijuana concentrate and is **intended for human use**;

Additional Information:

A review by AMCO staff regarding other state regulatory marijuana boards shows:

- California – Does not address oversight responsibilities of THC for animals
- Massachusetts – Does not address oversight responsibilities of THC for animals
- Washington – The Washington State Attorney General communicated that the State of Washington does not allow cannabis in dog treats.
- Oregon specifically prohibits a retail store from selling animal food, treats, or other pet or animal products containing hemp or marijuana. The issue of manufacturing products for animals is not currently addressed under Oregon’s manufacturing section.

Additionally, I requested Mr. David Schade and Mr. Robert Carter from CED and DNR add to their presentation today items from their training and experience as it pertains to marijuana and CBD laden animal edibles.

I am presenting the proposition that the Marijuana Control Board does not have statutorily standing to regulate animal products in any form only human consumption.

Additionally, I am recommending the board consider either taking no action or commence with a motion against the March 18, 2020 MJ-16 application as it specifically pertains to “ChillPill Canine Cookies.”

Glen Klinkhart
Interim Director
Alcohol & Marijuana Control Board
550 W 7th Ave #1600, Anchorage, AK 99501
Office (907) 269-0350



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Memorandum

Date: May 14, 2020

To: Marijuana Control Board (MCB) members

Reference: Cosmic Seaweed (LLC #19728) MJ-16 Request

At the April MCB meeting licensee Cosmic Seaweed requested approval of an MJ-16: Proposed New Marijuana Product. The Product requested for approval by the board was for a product "Chill Pill Canine Cookies" specifically designed for consumption by dogs/canines. The board asked the Alcohol and Marijuana Office (AMCO) to look in to the unusual situation and to reconsider the application at the June MCB meeting.

Further investigation has revealed that the oversight for such food products are under the purview of the State of Alaska Department of Agriculture. Additionally, the SOA Department of Agriculture is currently in process to publish regulations of such products.

It is the recommended by the AMCO that the MCB board not approve the MJ-16 since the board does not have jurisdiction or regulatory authority over the creation and consumption of edible items for animals.

Sincerely,

Glen Klinkhart
Interim Director
Alcohol Marijuana Control Board



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MEMORANDUM

TO: Chair and Members of the Board

DATE: March 18, 2020

FROM: Glen Klinkhart
Interim Director, Marijuana Control
Board

RE: Cosmic SeaWeed, LLC #19728

Cosmic SeaWeed, LLC, a Marijuana Product Manufacturing Facility, is requesting approval of eight new products. Attached is the MJ-16 Proposed New Marijuana Product for each product.

The product "Chill Pill Canine Cookies" are intended for canine consumption.





Alaska Marijuana Control Board

Form MJ-16: Proposed New Marijuana Product

What is this form?

This proposed new marijuana product form is required for a marijuana product manufacturing facility licensee who is seeking Marijuana Control Board (MCB) approval of a new marijuana product or marijuana concentrate for production at its licensed premises, as required under 3 AAC 306.100 and 3 AAC 306.525. **The required \$250 proposed new marijuana product fee may be made by check, cashier's check, or money order.**

This form must be completed and submitted to AMCO's main office prior to production of any new marijuana product or marijuana concentrate. **The proposed new marijuana product may not be produced unless and until the MCB has approved of the product.**

Please note that licensees seeking approval of more than one proposed new marijuana product or marijuana concentrate must submit a separate completed copy of this form and pay a separate fee for each proposed new marijuana product or marijuana concentrate.

Section 1 – Establishment Information

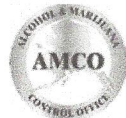
Enter information for the business seeking to be licensed, as identified on the license application.

| | | | | | |
|---------------------------|--|----------------------|--------|-------------|-------|
| Licensee: | Cosmic SeaWeed, LLC | MJ License #: | 19728 | | |
| License Type: | Marijuana Product Manufacturing Facility | | | | |
| Doing Business As: | Cosmic SeaWeed, LLC | | | | |
| Premises Address: | 262 Charles Way | | | | |
| City: | Homer | State: | Alaska | ZIP: | 99603 |


Section 2 – Proposed Marijuana Concentrate or Marijuana Product

Enter information for the marijuana concentrate or the marijuana product for which you are seeking MCB approval.

| | | | | | |
|---|---------------------------|-----------------------------------|----------|--|--|
| Product Name: | Chill Pill Canine Cookies | | | | |
| Product Type: Choose one. | Other Marijuana Product | | | | |
| Perishable: Yes/No | Yes | Shelf Life: If perishable. | 6 months | | |
| Intended Use: Smokable/ edible/topical/wholesale/etc. | Edible treats for dogs | | | | |

**Form MJ-16: Proposed New Marijuana Product****Section 3 – Proposed Product Details**

Enter information for the marijuana product for which you are seeking MCB approval.

| | |
|--|---|
| Product Description: Details must include the color, shape, and texture. | Chill Pill will be dog bone shaped, brown to tan in color, granular rough texture. Treats will be 2" in length by 1" in width by 1/2" thick. Consistency will be firm and crunchy. |
| Ingredients: | Wheat flour, eggs, canned pumpkin, peanut butter, Medium Chain Triglyceride oil, salt, cinnamon, cannabis oil for edibles. |
| Standard Production Procedure and Detailed Manufacturing Process: | Medium chain Triglyceride Oil and cannabis oil will be warmed and blended with an immersion blender until homogeneous. Other ingredients will be mixed together using a counter top kitchen mixer and the oil mixture will be blended in until homogeneous. Resulting dough will be rolled out to 1/2" thick, cut out into dog bone shapes using a cookie cutter mold. Then placed on parchment paper and baked at 350 for 40 minutes until hard. Product will be sent for required testing, packaged and placed in storage until testing complete, then sold to retailers. |
| Depiction: Provide a photograph, drawing, or graphic representation of the expected appearance of the final product. |  |



Form MJ-16: Proposed New Marijuana Product

Section 4 – Proposed Product Packaging and Sample Label

Enter information for the packaging and labeling of the marijuana product for which you are seeking MCB approval.

Packaging Description:

Details must include the color(s), size, packaging materials used, total amount of THC, individual serving sizes (if multiple), and other specifics showing compliance with 3 AAC 306.565. Please include photos, drawings, or graphic representations.

Chill Pill Canine Cookies will be packaged in child resistant resealable mylar bag, or CR cardboard packaging. Target THC will be 1mg per cookie. One cookie equals one serving; 20 cookies per package, Total THC per package 20mg.



Sample Labels:

Provide sample labels showing how the labeling requirements set forth in 3 AAC 306.570 will be met.



Chill Pill Canine Cookies Cannabis Infused Dog Treats



Production Batch # 022020-06

METRC# 1A40203000xxxxxxxxxxx123

Manufacturer Cosmic SeaWeed LLC Lic # 19728

1 mg THC per Cookie Serving size one cookie

20 Servings per package 20 mg total THC

Ingredients: Wheat flour, eggs, pumpkin, peanut butter, MCT oil, salt, cinnamon, cannabis concentrate.

Nutrition Facts Serving size 1 piece (25grams), Servings per containers 5, Amount per serving: Calories X, Fat Calories X, Total Fat X, Sat Fat X Trans Fat X, Cholesterol X, Sodium X, Total carb X, Dietary Fiber X, Sugars X, Protein X, Not a significant source of dietary fiber, sugars, Vit A, Vit D, Calcium or Iron. Percent daily values are based on a 2000 calorie diet.

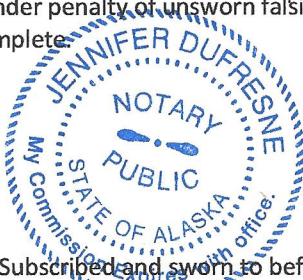
Marijuana has intoxicating effects and may be habit forming and addictive. Marijuana impairs concentration, coordination and judgment. Do not operate a vehicle or machinery under its influence. There are health risks associated with consumption of marijuana. For use only by adults twenty-one and older. Keep out of the reach of children. Marijuana should not be used by women who are pregnant or breastfeeding.

As a marijuana establishment licensee, I declare under penalty of unsworn falsification that this form, including all accompanying schedules and statements, is true, correct, and complete.

Signature of licensee

CHRISTINA A. LOGAN

Printed name of licensee



Notary Public in and for the State of Alaska.

My commission expires: with office

Subscribed and sworn to before me this 5th day of March, 2020.