MEMORANDUM

TO:      Marijuana Control Board  DATE:   June 23, 2022
FROM:    Jane P. Sawyer, Regulations Specialist   RE:   Regulations Project – Waste
          Management

At the April 2022 board meeting, the board sent out for public comment a regulation draft
\( \text{to repeal 3 AAC 306.740(c)(1). The repeal of this provision removes the requirement that a}
\) marijuana establishment give a three-day notice before making marijuana waste unusable and
\( \text{disposing of it.} \)

\( \text{The draft was out for about 33 days. It received two comments which are attached.} \)

Potential board actions:

- Consider comments received and adopt regulation as is;
- Amend draft and send back out for public comment;
- Send back to staff for more work;
- Close project.

Regarding changes to operating plans: the board had expressed to not require licensees to
\( \text{submit operating plans immediately, is that still the will of the board?} \).
3 AAC 306.740(c)(1) is repealed:

(1) repealed ____/____/_____; [GIVE THE BOARD NOTICE, ON A FORM PRESCRIBED BY THE BOARD, NOT LATER THAN THREE DAYS BEFORE MAKING THE WASTE UNUSABLE AND DISPOSING OF IT; HOWEVER, THE DIRECTOR MAY AUTHORIZE IMMEDIATE DISPOSAL ON AN EMERGENCY BASIS;]

(Eff. 2/21/2016, Register 217; am 10/20/2018, Register 228; am ___/___/_____, Register _____)

**Authority:**

AS 17.38.010 AS 17.38.150 AS 17.38.200

AS 17.38.070 AS 17.38.190 AS 17.38.900

AS 17.38.121
Hello, thank you for addressing the 3 day waste reporting requirement. This issue definitely needs a regulatory change. Holding waste in a cultivation facility for 3 days creates not only a space issue, but more importantly it is a very unsanitary practice. Any time you have moist, decomposing plant matter, it poses a risk for mold and other dangerous micro organisms to grow. Mold spores can germinate in as early as 12 hours in proper conditions. For those trying to keep a clean, safe and sanitary facility this current requirement creates even more of a challenge.

I strongly support a regulatory change that would allow the removal of such waste immediately. This is in everyone's best interest.

Thank you for your time and consideration,
Dollynda Phelps
907-252-8026

Sent from Yahoo Mail on Android
Please do away with the reporting requirement for the waste log. In fact, get rid of the waste log altogether.
With all of the other tracking information required it makes no sense to track waste in this manner. How often does enforcement look at waste logs? How often has enforcement checked a waste log? This is just another useless regulation adopted from early states regs.

This proposed change is just another example of the board tinkering around the edges of regulations that should be dropped or greatly modified. Please consider setting up a committee to address a total regulatory cleanup!

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