Date: 09/02/2022
To: amco.regs@alaska.gov
From: Alaska Marijuana Industry Association (AMIA)

Re: Comment on 3 AAC 306 The Marijuana Control Board proposes to adopt regulation changes in 3 AAC 306 of the Alaska Administrative Code, dealing with dairy butter, oils, and fats as stand-alone marijuana-infused products

Dear Honorable Marijuana Control Board Members,

The Marijuana Control Board proposes to adopt regulation changes in 3 AAC.306 regarding the prohibition of marijuana-infused dairy butter, oils, or fats not being prepared as stand-alone edible products for sale. We **do** support this change as written. We believe that consumers who are curious about preparing their own edibles would be well served to have access to butters and oils that are packaged with the requirements of any other edible. We also do not believe that this would bring competition to the existing edible manufacturers. It is exactly the opposite, it gives them another product opportunity for competition with products that already exist as concentrates. Butter or oil is simply an ingredient in this situation. We already have very similar products approved as edibles in the liquid water form, so what is the difference?

Allowing these products stated above, we allow for the expansion of our Alaskan cannabis market while helping consumers find alternatives. In other cannabis-regulated states, such as California, these standalone products are called “precision-dosed baking ingredients.” Creating the ability to manufacture these products would be a good move from a public health point of view, as it creates an alternative for consumers, allowing them to eat their cannabis instead of smoking it.

We ask that you please consider allowing dairy butters, oils, and fats to be approved as stand alone products. The AMIA would like to extend our gratitude to the AMCO staff and the Marijuana Control Board for your hard work, time, and dedication to our Industry.

Respectfully,

On behalf of the AMIA Board of Directors:

Ryan Tunseth

Ryan Tunseth
President (AMIA)
president@alaskamia.org

The Alaska Marijuana Industry Association is Alaska's only statewide cannabis industry trade group.
Our mission is to promote and advocate for a vibrant and reasonably regulated Alaska-based marijuana industry. The AMIA serves to strengthen and enhance a network of connected, independent, informed, regionally, and community-directed Alaska marijuana organizations.
www.alaskamia.org