



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: January 28, 2025

FROM: Kristina Serezhenkov, Regulations
Specialist

RE: Tracking Requirements for
Flowering Plants

The board approved the draft regulations for initial Law review at the September 2024 meeting. The draft was sent out for official public comment with the comment period closing December 16, 2024. A comment was received.

Options for the board:

- Move to adopt and send to Law for final review
- Move to amend and adopt and then send to Law for final review. (If amended, may require additional public comment period-agency attorney to advise.)
- Move to send back to staff for more work
- Table the regulations project
- Close the regulations project

(Words in **boldface and underlined** indicate language being added; words [CAPITALIZED AND BRACKETED] indicate language being deleted.)

3 AAC 306.435(a)(2)(A) is amended to read:

(2) assign a tracking number to each

(A) plant **that is**

(i) mature[OVER 18INCHES TALL]; **or**

(ii) flowering; and

(Eff. 2/21/2016, Register 217; am 3/13/2020, Register 233; am 1/22/2023, Register 245; am 8/16/2024 Register 251; 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

From: [Trevor Haynes](#)
To: [CED AMCO REGS \(CED sponsored\)](#)
Subject: AMIA Public Comment on Proposed Regulation Changes
Date: Monday, December 16, 2024 4:18:42 PM
Attachments: [AMIA Dec 2024 MCB Public Comment letter.pdf](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear AMCO Office,

Please find attached the AMIA's public comments on the proposed regulation changes with comment periods closing today.

Thank you for all the work you do for our industry.
Sincerely,

Trevor Haynes
President, Alaska Marijuana Industry Association
907-888-3367

Date: 12/16/2024

To: Alaska Marijuana Control Board (MCB)
amco.regs@alaska.gov

From: Alaska Marijuana Industry Association (AMIA)



Re: Draft Regulations Projects Open for Public Comment

The Alaska Marijuana Industry Association (AMIA) is writing in support of the following regulation changes that are currently out for public comment:

1) PROPOSED CHANGES TO MARIJUANA HANDLER PERMIT EDUCATION COURSE REQUIREMENTS IN THE REGULATIONS OF THE MARIJUANA CONTROL BOARD

The AMIA is supportive of the removal of the need to cover medical marijuana in the Marijuana Handler Permit (MHP) courses. Removal of this requirement will help courses be more relevant to the recreational marijuana market, which is the primary market these courses serve.

The AMIA would like to point out that there is a consensus from industry that the available MHP courses are highly variable in scope and quality. We generally believe that regulation changes that increase quality and standardize the scope of the courses offered will increase the value of MHP courses to individuals, and the industry as a whole.

2) PROPOSED CHANGES TO LICENSE RENEWAL FEES IN THE REGULATIONS OF THE MARIJUANA CONTROL BOARD

The AMIA is supportive of this regulation change. This proposed change would reduce renewal fees by 50%. Renewal fees are one of the major financial burdens faced by marijuana businesses operating in the legal recreational market. Reduction of the financial burden from license renewal fees will provide licensees substantial and much needed financial relief.

3) PROPOSED CHANGES TO FLOWERING PLANT TRACKING REQUIREMENTS IN THE REGULATIONS OF THE MARIJUANA CONTROL BOARD

The AMIA is supportive of this regulation change. This proposed change closes a potential loophole that would arise if a cultivator attempted to flower a marijuana plant under 18 inches to avoid having to track flowering plants in the Metrc system.

Respectfully,

AMIA Board of Directors