



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 RE: Removing Batch Limits for Clones
Specialist or Cuttings

The board approved the draft regulations for initial Law review at the September 2024 meeting. Law made further edits to the draft which were approved by the board at the November 20, 2024 meeting. The draft was sent out for official public comment with the comment period closing January 2, 2025. Comments were 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)(3) is amended to read:

(3) assign a plant batch name or number to each batch of **immature plants propagated from seed**, clones, or cuttings [; A BATCH MAY NOT CONSIST OF MORE THAN 50 CLONES OR CUTTINGS].

(Eff. 2/21/2016, Register 217; am 03/13/2020, Register 233; am 1/22/2023, Register 245; am 8/16/2024, Register 251; am ____/____/____, Register ____; 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		

((Publisher: Please remove the "0" from "03/13/2020" in the history note.)))

3 AAC 306.990(b) is amended by adding a new paragraph to read:

(53) "plant batch" means a specifically identified quantity of immature plants that are propagated at the same time and from the seeds, clones, or cuttings of a marijuana plant or marijuana plants that are uniform in strain, cultivated in one place and under the same conditions, and using the same medium and agricultural chemicals including pesticides and fungicides. (Eff. 2/24/2015, Register 213; am 2/21/2016, Register 217; am 10/11/2017, Register 224; am 8/11/2018, Register 227; am 10/20/2018, Register 228; am 4/11/2019, Register 230; am 5/9/2019, Register 230; am 3/13/2020, Register 233; am 12/6/2020, Register 236; [AM

Register _____, _____ 2025

COMMERCE, COMMUNITY, AND EC. DEV.

12/10/2020, REGISTER 236;] am 8/7/2021, Register 239; am 7/23/2023, Register 247; am

____/____/____, Register _____; am ____/____/____, Register _____)

Authority: AS 17.38.010 AS 17.38.121 AS 17.38.900

AS 17.38.040 AS 17.38.190 AS 18.35.301

AS 17.38.070 AS 17.38.200

((Publisher: At the end of 3 AAC 306.990(b)(52), please change the period to a semicolon.)))

From: [Trevor Haynes](#)
To: [CED AMCO REGS \(CED sponsored\)](#)
Subject: AMIA Public Comment
Date: Thursday, January 2, 2025 4:19:11 PM
Attachments: [AMIA January 2025 MCB Public Comment Batch Limits\(1\).pdf](#)
[AMIA January 2025 MCB Public Comment Labeling Requirements\(1\).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 Staff and MCB,
Attached is the public comment from the Alaska Marijuana Industry Association on "Batch Limits" and "Labeling Requirements".
Thank you,
Trevor Haynes
President, Alaska Marijuana Industry Association
907-888-3367

Date:01/02/2025

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

From: Alaska Marijuana Industry Association (AMIA)



Re: Comment on MCB proposed changes to regulations in Title 3, Chapter 306 of the Alaska Administrative Code

The Alaska Marijuana Industry Association (AMIA) strongly supports amending Title 3, Chapter 306 of the Alaska Administrative Code to remove batch limits, as they do not serve any identifiable public health or safety priorities. Under current regulations, clones and seeds must be assigned tags in batches of 50. This requirement imposes unnecessary costs on cultivators by mandating the purchase of additional METRC tags without delivering meaningful benefits to public health or safety.

The industry is grappling with burdensome and costly regulations, and we respectfully request the board's support for this regulatory amendment. We appreciate the board's responsiveness to public comments and commend the proposed inclusion of seeds in this regulation. This amendment aligns with best practices in the industry and supports a more streamlined approach to cultivation operations. AMIA suggests amending these limits to reduce financial burdens and promote sustainable operations, all while ensuring compliance with state regulations.

By addressing these key regulatory changes, the Marijuana Control Board can better support the evolving needs of Alaska's marijuana industry, which is increasingly composed of responsible business owners dedicated to public health and safety..Thank you for your consideration and continued commitment to fostering a sustainable and compliant industry.

Respectfully,

Trevor Haynes
AMIA President

From: [Barret Goodale](#)
To: [CED AMCO REGS \(CED sponsored\)](#)
Cc: [Trevor Haynes](#); [Greg Allison](#)
Subject: Public Comment: Removal of Batch Limits of Clones
Date: Tuesday, December 31, 2024 10:15:09 AM

You don't often get email from barret@goodalaska.com. [Learn why this is important](#)

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Hello AMCO Staff and Marijuana Control Board,

I support the proposed changes to section 3AAC 306.435(a)(3).

I believe this will reduce unnecessary tracking requirements for cultivators that serve no purpose to help AMCO or to protect public health and safety.

Sincerely,

C. Barret Goodale
GOOD Cultivation Manager
907-699-9478

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Alaska Marijuana Industry Association member
