



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: Labelling Requirements for
Marijuana Test Results

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. 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 306.475(e) is amended to read:

(e) If a marijuana cultivation facility transports wholesale marijuana to another marijuana establishment for sale at retail or for use in manufacturing a marijuana product, a label must be affixed to the shipping container showing that a licensed marijuana testing facility has tested each harvest batch in the shipment as provided in 3 AAC 306.645. The label must report the test results, including

(1) a cannabinoid potency profile expressed as a range of percentages that extends from the lowest percentage to highest percentage of concentration for each cannabinoid listed from every test conducted on that strain of marijuana from the same marijuana cultivation facility within the last three months;

(2) a statement listing the results of microbial testing required under 3 AAC 306.645(b)(2); **and**

(3) a statement listing the results of residual solvent testing required under 3 AAC 306.645(b)(3), if applicable [; AND

(4) A STATEMENT LISTING ANY CONTAMINANTS FOR WHICH THE PRODUCT WAS TESTED IN ADDITION TO CONTAMINANTS FOR WHICH 3 AAC 306.645(b) REQUIRES TESTING; ANY ADDITIONAL TESTED CONTAMINANTS INCLUDE

(A) MOLDS, MILDEW, AND FILTH;

(B) HERBICIDES, PESTICIDES, AND FUNGICIDES; AND

(C) HARMFUL CHEMICALS].

3 AAC 306.475(f) is amended to read:

(f) If a marijuana cultivation facility ships wholesale marijuana from a harvest batch that has not been tested for each contaminant listed in (g) [(e)(4)] of this section, the label for that batch must include a statement identifying each contaminant listed in (g) [(e)(4)] of this section for which that harvest batch has not been tested.

3 AAC 306.475 is amended by adding a new subsection to read:

(g) If a marijuana cultivation facility transports wholesale marijuana to another marijuana establishment for sale at retail or for use in manufacturing a marijuana product, the marijuana cultivation facility shall produce a statement that lists contaminants for which the wholesale marijuana was tested in addition to the contaminant testing required under 3 AAC 306.645(b) immediately upon request of the receiving marijuana establishment. Additional tested contaminants may include

(1) molds, mildew, and filth;

(2) herbicides, pesticides, and fungicides; and

(3) harmful chemicals. (Eff. 2/21/2016, Register 217; am 11/8/2018, 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

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

(52) "filth" has the meaning given "contaminated with filth" in AS 17.20.370

(Alaska Food, Drug, and Cosmetic Act; definitions). (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 12/10/2020, REGISTER 236;] am 8/7/2021, Register 239; am 7/23/2023, Register 247; 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)(51), 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 unnecessary labeling requirements for marijuana. Under current regulations, every marijuana transport must include a statement detailing the contaminants for which the product was tested, along with the testing results. AMIA has identified that this regulation is rarely enforced and provides minimal benefit.

We believe this paperwork is redundant and creates unnecessary administrative burdens. However, we fully support the proposed amendment requiring cultivators to provide this information only upon request. This approach balances regulatory compliance with the practical needs of the industry while still prioritizing public health and safety.

As industry continues to face burdensome and costly regulations, AMIA respectfully urges the board to support this amendment. We appreciate the board's commitment to revising regulations that better serve both the industry and the public. The inclusion of a "compliance upon request" provision aligns with best practices, promotes efficiency, and reduces waste.

By addressing this and other key regulatory changes, the Marijuana Control Board can further support Alaska's evolving marijuana industry, composed of responsible business owners dedicated to compliance, sustainability, and public safety. Thank you for your consideration and your ongoing efforts to foster a more sustainable and practical regulatory environment.

Respectfully,

Trevor Haynes
AMIA President