



Members of the Independent Regulation Review Commission and Department of Health

I am submitting public comment in response to proposed Regulation #10-219: Medical Marijuana. The Medical Marijuana Program provides critical relief for thousands of patients across the Commonwealth, sustainable jobs for growers, processors and distributors and an opportunity to pave the way for a new industry in Pennsylvania. As an employee of the medical marijuana industry and a constituent of the Commonwealth I believe it is imperative that employers in this industry are accountable and held to a standard consistent with other industries serving patients in the Commonwealth. It is critical that we get the process right in order to protect the workforce and the future of this industry. As such, my comments are regarding section **§ 1141.47. General penalties and sanctions.**

As you are aware, applicants seeking a medical marijuana license submit a comprehensive application detailing their projected plans, financials, diversity plans, impact on the community, and more. Applicants have been able to receive additional points on their application by signing a **neutrality and card check agreement with a labor organization**, agreeing to stay neutral in the attempt to organize the workforce, bringing better wages, benefits and protection to employees like myself. With a limited number of licenses available and therefore limited opportunities for employment, it is critical that these employers are being held to such standards when receiving their license.

As such, I am requesting a change to subsection 1141.47 (General penalties and sanctions). I am requesting that the Independent Regulation Review Commission include the following language to ensure that employers comply with the neutrality and card check agreements they submit with their application, giving the employees the opportunity to learn about all of their options:

**§ 1141.47. General penalties and sanctions.** (a)(v) The medical marijuana organization fails to comply with neutrality and card check agreements and/or other labor peace agreements submitted with the initial application.

This simple addition will permit the Department of Health to ensure that employers are not falsifying their plans to stay neutral on applications in order to receive additional points. This is a step that will ensure that the workforce is being considered during the regulatory process. This simple change will help protect the workforce of an industry that we are still learning how to best operate. Thank you for taking my comments into consideration.

Sincerely,

Paul Oleck

Cultivation Technician