DH, MMRegulations

From: Jacqueline Ferraro <jacquelinemf@icloud.com>
Sent: Friday, April 2, 2021 5:48 PM
To: DH, MMRegulations
Cc: Jacqueline Ferraro; Deb Miran
Subject: [External] Comments: Notice of Proposed Rulemaking Medical Marijuana Regulations
Attachments: Comments Cannabis Advisory Group.pdf

Good Day, John,

Thank you for the opportunity to provide comments on the proposed rulemaking Medical Marijuana Regulations.

On behalf of the Cannabis Advisory Group, please find our comments on the new laboratory testing requirements in Ch. 1171a.29 subsection (C).

If you should have any questions, please don't hesitate to contact me directly. Again, thank you very much for your consideration. Have a great night.

Best,
Jacqueline Ferraro
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CANNABIS
ADVISORY GROUP

John J. Collins, Director
Office of Medical Marijuana
Department of Health, Room 628
625 Forster Street
Harrisburg, PA 17120

Via email RA-DHMMregulations@pa.gov

April 2, 2021

Re: PROPOSED RULEMAKING Medical Marijuana Proposed Regulations

Dear Director Collins,

The Cannabis Advisory Group would like to provide comments about the Notice of Proposed Rulemaking for Medical Marijuana Regulations, which was published in the Pennsylvania Bulletin on March 4, 2021.

The Cannabis Advisory Group (CAG) is a diverse group of professionals with expertise in cannabis policy, regulatory compliance, business, social justice, economics, science, and medicine. We are united in the desire to maximize the regulatory framework for legal access to hemp and cannabis, both in adult-use and medicinal markets.

CAG's comments focus on a new laboratory testing requirement in Ch.1171a.29 subsection (C). Specifically, the proposed rule states "...that one approved laboratory must conduct testing on the harvest sample and a different approved laboratory must conduct testing on the processed sample. This revision creates checks and balances in the testing process".

CAG opposes the proposed requirement that a different laboratory must conduct testing on the processed product for the following reasons:

- The cultivator and the processor contract with one laboratory so that they can have consistency and standardization with the test results by limiting the variables. These variables include testing methodologies, equipment, personnel. Currently, no standardized methods have been widely accepted for potency and purity, so each approved testing laboratory develops and validates their own analytical methods for each required test.

- Because of these variables, the cultivator/processor cannot accurately compare test results between harvest samples and processed product samples.

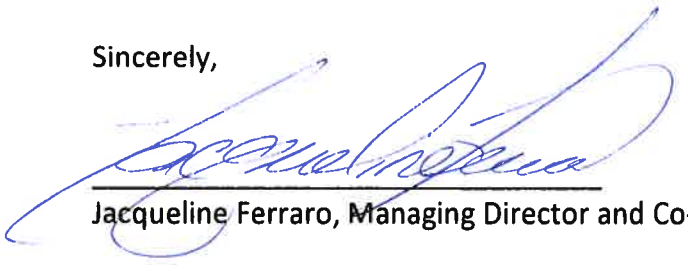
Until analytical methods for testing marijuana products are standardized and fully validated, cultivators and processors should not be required to use two different laboratories to perform the release testing.

CAG knows of no other state cannabis regulatory framework that includes this requirement and believes it would set a poor precedent for the marijuana testing sector.

Therefore, CAG respectfully requests that the subsection (c) amendment be deleted in favor of the original language in the current temporary regulations.

Thank you for your time and consideration.

Sincerely,



Jacqueline Ferraro, Managing Director and Co-Founder of the Cannabis Advisory Group