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# Memorandum

## VIA E-MAIL

**DATE:** April 1, 2020

**TO:** Senator Peter Lucido, Chairperson, JCAR  
Representative Matt Maddock, Alternate Chairperson, JCAR  
Evan Keimach, Senate Majority Policy Office  
Jimmy Biehl, House Republican Policy Office  
Tim Reeves, Counsel, JCAR  
Elizabeth Edberg, Counsel, JCAR

**FROM:** Marlon I. Brown, Director of Policy and Legislative Affairs *MB*

**SUBJECT:** Joint Committee on Administrative Rules (JCAR) Briefing Memo for Rule Set 2019-67 LR Marihuana Licenses

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## Rules Primer

The general purpose of the proposed rules is to standardize the licensing and renewal requirements for all licenses issued by the agency under the Medical Marihuana Facilities Licensing Act (MMFLA) and the Michigan Regulation and Taxation of Marihuana Act (MRTMA).

## Summary of the Final Proposed Rule

The proposed rules standardize licensing and renewal requirements, along with licensing procedures for all licenses issued by the agency.

## Stakeholder Engagement

There was no specific engagement of stakeholders in the drafting of the pre-public hearing draft of the proposed rules.

### **Public Engagement and Public Hearing / Comment / Information**

The public comment period began on February 2, 2020 and ended on February 17, 2020. The notice of public comment period, in addition to being posted in various newspapers as required, was distributed via email to interested parties signed up to receive such notices. The public hearing was held at the Marijuana Regulatory Agency, Jupiter Conference Room on February 12, 2020. There were no comments made in support or opposition to the proposed rules. There were minimal comments requesting modifications to the proposed rules.

### **Modifications Made Due to Public Comment**

Modifications were made to the definition of applicant to make it compliant with other statutory requirements and current policies. The prequalification status was extended from 1 year to 2 years. The Marihuana Delivery License was removed from this rule set. Any provisions relating to labor peace agreements were removed from this rule set.

### **Significant Issues Not Incorporated in the Final Proposed Rules**

Labor peace agreements and the Marihuana Delivery License.

cc/att: Kim Gaedeke, Chief Deputy Director, LARA  
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