

MARIHUANA REGULATORY AGENCY
PUBLIC HEARING

September 27, 2021

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STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
MARIHUANA REGULATORY AGENCY

PUBLIC HEARING

525 West Ottawa Street, Lansing, Michigan

Monday, September 27, 2021, 9:30 a.m.

APPEARANCES:

For the Department of
Licensing and
Regulatory Affairs:

MS. JESSICA S. FOX (P70937)
MRA/LARA - State of Michigan
2407 North Grand River Avenue
Lansing, Michigan 48906

Also Present:

Andrew Brisbo, Executive Director,
Marijuana Regulatory Agency
Kelly Kronner

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1 Lansing, Michigan

2 Monday, September 27, 2021 - 9:38 a.m.

3 MS. FOX: Good morning, everyone. My name is
4 Jessica Fox. And to my left is Director Andrew Brisbo. And
5 we will be facilitating the hearing this morning on behalf
6 of the Marijuana Regulatory Agency. So this is a public
7 hearing on the proposed administrative rules. Now bear with
8 me as I list all of these out: marihuana disciplinary
9 proceedings 2020-117 LR, marihuana hearings 2020-118 LR,
10 marihuana infused products and edible products 2020-119 LR,
11 marihuana licensees 2020-120 LR, marihuana licenses 2020-122
12 LR, marihuana sale or transfer 2020-123 LR, marihuana
13 sampling and testing 2020-124 LR, marihuana employees
14 2021-10 LR, and marihuana declaratory rulings 2021-29 LR.
15 This hearing is being conducted pursuant to provisions
16 required by and with the authority conferred on the
17 executive director of the agency, who is authorized to
18 promulgate these rules based on section 206 of the MMFLA,
19 sections 7 and 8 of MRTMA, section 5 of the Michigan Medical
20 Marihuana Act and the Marihuana Tracking Act, along with
21 Executive Reorganization order number 2019-2.

22 MR. BRISBO: This hearing is being called to order
23 at 9:40 a.m. on September 27th, 2021, at the Williams
24 Building, first floor auditorium in Lansing, Michigan. This
25 hearing was published in three newspapers of general

1 circulation as well as the Michigan Register published on
2 September 1st, 2021. Thank you all for joining us today.
3 Please know we're here to receive your comments on the
4 proposed rules. If you are interested in making other types
5 of comments to the agency, we do have a public -- our
6 quarterly public meeting scheduled Wednesday of this week.
7 We would like to limit comments at this hearing to the
8 proposed rules. So please keep your comments limited to
9 those topics. We have provided an option to join this
10 meeting via Zoom webinar for members of the public who will
11 be unable to attend in person. Please note that public
12 testimony -- testimony will only be available for those
13 attending the meeting in person. However, you may submit
14 comments in writing until 5:00 p.m. today at MRA-
15 legal@mich.gov.

16 MS. FOX: So if you wish to speak today, please
17 make sure that you've filled out a comment card with your
18 name and the rule number or the citation that you would like
19 to be commenting on today. When you come forward to speak,
20 please state your name and the rule number or citation that
21 you're going to be commenting on so that this information
22 may be transcribed into the hearing report. Particular
23 comment is helpful when the staff review your comments in
24 the transcript after today. Additionally, please try to
25 limit your comments to five minutes. If you do need more

1 time, please consider submitting additional comments by
2 email to the address Director Brisbo just stated and is also
3 on the notice. Written comment will be accepted until
4 September 27th, 2021 at 5:00 p.m. Please remember the
5 public comment today is an opportunity for members of the
6 public to comment, not obtain feedback, engage in
7 discussions or dialogue, or receive answers from the agency.
8 We're here today to listen to you and your comments on the
9 rules. So please be sure when you come to the microphone
10 that you state your name and the rule number that you will
11 be commenting on. Thank you.

12 MR. HARNS: You'll need to speak really close to
13 the microphone. And we'll be cleaning them between uses,
14 so --

15 MS. FOX: Okay. The first person I have for
16 public comment is Tiffany Coleman from CarbideX/Franklin
17 Fields of Michigan ASA.

18 COMMENTS

19 BY MS. COLEMAN:

20 MS. COLEMAN: Can you hear me? More louder? More
21 closer? I have -- I have comments on three of the rules.
22 The first one is for -- on 2020-124 LR 420.306 new
23 subsection 3, which is on Aspergillus. I wanted to indicate
24 that Aspergillus can be remediated, although the rule says
25 that it shall not, that there -- a majority of operators in

1 the state are remediating prior to testing, that the threat
2 posed by Aspergillus is specific to mycotoxins that can be
3 created that are, you know, pathogenic and can cause harm.
4 And therefore it should not be that Aspergillus testing
5 would be what forces things to not be remediated. But
6 mycotoxin testing specific to those pathogens that are
7 created by the Aspergillus. And that should -- the rule
8 should be updated to indicate that, especially since
9 currently remediation is occurring prior to testing in the
10 state, which would mean that those mycotoxins would still be
11 present in the plant and able to harm people without -- and
12 passing test results. The next section is from 2020-120 LR,
13 420.11 (a) on agreements. This is a new section which
14 appears to be aligned with a previously published bulletin.
15 However, it -- I had noted that the definition of profits
16 has not been provided anywhere in the document. So it is
17 insufficient to allow for accounting clarity. Is it profit
18 as revenue? Profits after losses accrued profit only on
19 specific certain items as defined in an agreement, profits
20 for all things at a -- a single entity or all things that a
21 group of entities that would be aligned. And also this
22 would completely preclude non-profits or zero profit
23 companies from being able to have agreements in the space,
24 which seems inappropriate and limiting for companies that
25 are already operating in that way. Thank you. And the last

1 one from 2020-124 LR, it's 420.305 (9)©, the new calculation
2 of total THC. I wanted to make sure that the agency was
3 aware that from a consumer standpoint as well as from a
4 producer's standpoint, there is a significant difference
5 between the different structural isomers of THC and that
6 labeling something to say that a total THC quantity includes
7 all of D-8, D-7, D-10, D-11 and D-9, given that they have
8 different petitional efficacy would be inappropriate. And
9 as such, they should be labeled and reported separately both
10 on the report and on labels that are put into commerce.
11 Thank you.

12 MS. FOX: Next for public comment, W. Michael
13 Webster from Exspiravit.

14 COMMENTS

15 BY MR. WEBSTER:

16 MR. WEBSTER: Good morning. My name is Michael
17 Webster. I am here representing my social equity operation,
18 Exspiravit, LLC, as well as members of the social equity
19 space. I would like to thank Director Brisbo, Ms. Fox, and
20 esteemed members of the cannabis community for the
21 opportunity to speak. I stand in support of rule set
22 2020-121 LR with the exception -- I would like to raise the
23 objection to the removal of the extraction piece for the
24 micro -- sorry -- class A microbusiness license. I believe
25 this addition by subtraction policy will be harmful to

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1 microgrowers -- microoperators like myself. And I think
2 that particular attention should be paid to the social
3 equity space. Those of us in the social equity space endure
4 significant hurdles in trying to enter into the sector. And
5 removing opportunities to bring products to market is
6 harmful to our business model. I believe that should be
7 revisited and reconsidered and that the extraction component
8 should be included in the microlicense, the class A
9 microlicense. I would also like to, on behalf of my
10 accelerated -- my incubator program, the Detroit Cannabis
11 Project, make mention of the continued struggles faced by
12 members of the social equity space. I think what's going on
13 in Detroit -- while I understand the jurisdictional
14 separation, I think what's going on in Detroit with regard
15 to legacy is a travesty. I think many of Black and Brown
16 people, poor white people, other marginalized groups
17 continue to endure significant barriers entering into the
18 sector. Many of us have leveraged all of our financial
19 resources, relationships to enter into the space only to be
20 met by significant hurdle. So while I -- again I understand
21 the jurisdictional separation, I think that something should
22 be done. I think the pecking order, for lack of a better
23 term, the city answering -- I'm sorry -- the state answering
24 to the city is absurd. And while the respect for the
25 jurisdictional division should remain, I think that other

1 resources should be deployed, other allotments should be
2 made, other concessions should be made for those Detroit
3 legacy operators who are currently in limbo. And again I
4 understand I'm getting a little bit off track. But I'm
5 speaking with regard to that microgrow class A license,
6 which is attainable for many of us and represents a bright
7 spot. But when you start doing addition by subtraction and
8 removing components of it that are so promising particularly
9 for someone like myself who is an extraction artist, I think
10 that is problematic and should be reconsidered. I thank you
11 for the opportunity to speak. And have a good day.

12 MS. FOX: Next, John Fraser with the State Bar of
13 Michigan's Cannabis law section.

14 COMMENTS

15 BY MR. FRASER:

16 MR. FRASER: Good morning. Can you hear me okay?

17 MS. FOX: (Nodding head in affirmative)

18 MR. FRASER: Okay. Excellent. I've got an
19 outdoor voice anyway for everybody who's heard me talk
20 before. So I have to give a disclaimer because the State
21 Bar always has rules. So the cannabis law section of the
22 State Bar of Michigan is not the State Bar of Michigan, but
23 it's a section whose membership is voluntary. The position
24 expressed in my comments is that of the cannabis law section
25 only. And the State Bar of Michigan has no position on

1 these comments. The cannabis law section has approximately
2 911 members as of the date of these comments. And the
3 special committee on administrative rules of the cannabis
4 law section consists of -- of six members of the cannabis
5 law section. We met numerous times and all members of the
6 special committee voted in favor of the positions contained
7 in -- in these comments. So sorry for the disclaimer.
8 Rules are rules, though. So the committee had the
9 opportunity to review the proposed rules. We had specific
10 concerns in particular about a couple of the rules. And
11 we'll be submitting written comments. But I did want to
12 take the opportunity to speak here to let the agency know
13 that we'll be submitting written comments and to voice
14 concerns about a couple of the proposed rule sets that the
15 special committee thought were of particular importance.
16 One is not a particular rule that we could identify because
17 it's been really a consistent practice of the agency. As
18 lawyers, as folks working in the industry, we all very much
19 appreciate when the agency puts out written guidance and
20 helps clarify the agency's position on things. Myself, the
21 other members of the committee, other members of the
22 cannabis law section all have expressed concerns
23 historically about the agency's issuance of written guidance
24 that has the force of law that is not done through the --
25 the rule-making process required by the Administrative

1 Procedures Act. We would ask the agency revisit the various
2 areas of the written rule set where it contemplates the
3 agency filling in gaps through the issuance or subsequent
4 written guidance. Most of those have happened by way of
5 bulletins. And in particular this -- this happens with the
6 safety compliance facility testing standards. We would ask
7 that those standards just be incorporated directly into the
8 administrative rule sets and provide clarity and consistency
9 for the industry. If an emergency arises, like what
10 happened with the vitamin E acetate, the agency retains the
11 authority other issue an emergency rule that's directly
12 responsive to any emergent threats to public health and
13 safety. We would also like to address -- the members of the
14 committee and -- and the members of the section have
15 expressed some concerns about proposed rule 420.105(a) with
16 respect to the class A microbusiness license insofar as that
17 license allows that particular licensee to buy mature plants
18 from any member of the public who's at least 21 years of
19 age. There is no lawful authority for those types of
20 transactions in the MRTMA. The MRTMA does not allow an
21 adult over the age of 21 to sell plants lawfully to any
22 other person. So that kind of contemplates encouraging
23 criminal activity. And similarly, the MMMA only allows
24 transfers from a caregiver to his or her patients, so to
25 sell mature plants to a state licensee again doesn't seem

1 like there's legal authority for that to be done lawfully in
2 accordance with the Acts. The other concerns that were
3 expressed by members with regards to that practice is that
4 if mature plants can be directly imported into the licensed
5 marketplace, it disincentivizes licensees from having to
6 cultivate their own plants because if they can source in
7 mature plants from other sources, they could just buy mature
8 plants that are immediately ready for harvest, harvest them
9 and then ship the product off for lab testing. One final
10 comment was with respect to rule 420.8 sub 2(b) sub 8 with
11 respect to contactless and limited contact transactions. We
12 all applaud the agency's decision to be explicit in allowing
13 contactless and limited contact transactions. COVID has
14 shown that curbside is effective. It's something that
15 customers want. It's something that licensees can do
16 responsibly. I think the agency is also contemplating
17 allowing drive-through transactions with this rule. I would
18 ask if that is the agency's decision to be explicit in
19 allowing drive-through. Having worked with a number of
20 municipal officials, because drive-through transactions were
21 previously prohibited, anything short of an explicit
22 authorization by the agency of drive-through transactions,
23 it's probably going to be met with reluctance at the
24 municipal level by thinking that the status quo of
25 prohibiting drive-through is still in place even though the

1 rule doesn't necessarily say that. So I -- I see I'm out of
2 time. We'll submit our comments in writing here later
3 today. Thank you very much.

4 MS. FOX: Okay. Next for public comment, Shelly
5 Edgerton with MCMA.

6 COMMENTS

7 BY MS. EDGERTON:

8 MS. EDGERTON: Can you hear me?

9 MS. FOX: (Nodding head in affirmative)

10 MS. EDGERTON: Okay. My name is Shelly Edgerton.
11 I'm board chair for the MCMA. And I appreciate the
12 opportunity to be here to comment on the whole entire rule
13 set. We will be providing written comments. So in
14 particular, quite a substantial amount of pages. So I'm not
15 going to go through everything. Some of this will be a
16 little redundant as well from the State Bar section. But I
17 certainly appreciate the staff and everyone's input into
18 this. It's -- I know having been in your shoes, it's a --
19 it's a timely venture. So I really want to praise, you
20 know, MRA for all the work that they've done and -- and
21 certainly appreciate the big effort on safety and patient
22 safety for testing. Mirroring what the law section said, we
23 obviously are concerned about the continued use of bulletins
24 and guidance. I get it from where we were originally from
25 the program starting, you had to have it. This industry

1 demanded answers quickly and -- and we had to, you know,
2 almost build the airplane while we were building the
3 program. So it is very important to use those. However, I
4 think the continued use and implication in the rules is
5 problematic. I mean, we've had course cases as late as six
6 months ago talking about the decision making of agencies.
7 With rules -- using rules, guidelines and bulletins
8 within -- within their acts. So I do think it's important
9 that you continue to start to look at this and maybe address
10 it. Take a little time, maybe incorporate some of those
11 bulletins totally within the rules. You certainly have
12 emergency rule making authority, so if you need something
13 similar to the vitamin acetate, you could do something very
14 quickly. And certainly we could always work with you and
15 the legislature to make sure that you have quick authority
16 to do something. Moving on, obviously this is a great
17 opportunity to continue clean up a lot of the definitional
18 points in the rule set for 121, beginning with the whole
19 issue of who is an applicant and the indirect -- indirect
20 applicant, whether that triggers something for them to
21 actually fill out an application. I know the agency
22 probably has struggled at -- with this from the get-go. But
23 I think there's the ability here to really start to kind of
24 narrow the limitations, whether it's the -- through the
25 money lender, through the landlord. I mean, you're putting

1 out examples and we know that from practice of applicants
2 that people are able to -- the agency is able to determine
3 what is an indirect interest. I think it's something you
4 struggle with, but I think enunciating that within the rules
5 is probably a good place to go. Rule 420.110(d)(D), you
6 talking about limited access and restricted areas and
7 apparently there's still some overlap. We would like to see
8 the potential -- what's really happening in the
9 manufacturing space. And that is to recognize that there
10 are common shared spaces for processors and growers and how
11 that looks from maybe a planning stage or a build out stage.
12 And what can we do -- what can we do or what can be done I
13 guess to effectuate that kind of shared common space
14 that's -- probably happens in every manufacturing place.
15 Appreciate the cleanup for municipal attestations. We
16 know -- we all know and suffer from that so that's
17 definitely an issue. We would like to see some
18 clarification on what are regulatory programs -- sorry --
19 employees. I think -- I think from a common sense
20 standpoint, I think there's a lot of regulatory persons that
21 are out there. But is that meaning, like, the Mackinac
22 Bridge Authority? I mean, we start to exclude further out.
23 And I know there's legislation with Representative Calley to
24 kind of clarify some of this, but maybe taking a little bit
25 deeper dive on what employees would be impacted from a

1 regulatory standpoint. Again, rule 420.6(2)(h), maybe take
2 another stab at the whole definition of the five license --
3 the five adult class use licenses, maybe with the definition
4 of marijuana grower or is it marijuana grower in the
5 license? You seem to struggle in terms of the excess grow
6 licenses. And -- and honestly, I think even, Andrew, you
7 mentioned out looking at the marketplace to see if there's
8 even the need for prorating the -- what the medical licenses
9 are compared to the AU licenses for the excess grow.
10 Because we know people are purchasing medical licenses only
11 in order to get the grow licenses. Certainly applaud the
12 agency's reduction or time frame for stale applicants. I
13 think that's a great administrative move, so I think that's
14 really, really there. Reiterating what John said on the
15 contact list, I think it's -- I think it's necessary in rule
16 420.8 to specify for locals the drive-through. And I think
17 even if there's other avenues that the industry is looking
18 at for contactless reach, lockers, other things, maybe those
19 things should already be spelled out and -- and moved
20 forward. So I would appreciate that. Just a clarification,
21 rule 420.14, there's still this dichotomy between calendar
22 days and business days. I think going through the rules we
23 just need to be consistent in terms of what happens with
24 those. We are opposed to the -- the new license, the class
25 A microbusiness. I think John laid the case out very well

1 in terms of the ability to disrupt the marketplace and how
2 it stands. I think if we're looking to address issues of
3 social equity, which they -- I believe this was supposed to
4 be based upon -- and maybe it's the processing side of that.
5 Maybe there's another avenue to address the processing
6 extraction side for microbusinesses rather than creating a
7 whole 'nother class. I do think John raises a good point
8 about the illegality of the -- the two acts, MRTMA and MMMA
9 and how this is structured right now. So re-emphasize that,
10 that we oppose that. I think the agency under rule 420.20
11 is definitely looking at the whole financial statement
12 issue, the mountains of work and documents required,
13 certainly want to be able to take a time line perspective of
14 what that looks and really what's practice in the -- in the
15 manufacturing and industry. I think that's definitely an
16 area that is very costly to any -- any licensee within
17 the -- within the industry. In terms of rule 2020-120,
18 licensees rule set, we certainly have some issues. I think
19 just clarification on the gross profit. I think the
20 gentleman here raised the issue or someone raised the issue
21 on gross profits, net profits. What does that mean? Is
22 it gross minus losses? Is it net profit? So I think it
23 would behoove the agency to maybe take another look at that
24 to see if there's not some clarification that could do to
25 provide that greater ability to go there. I'm not going to

1 go through all of these (indicating). Obviously John's
2 raised the issue of the contactless; probably need -- this
3 would be rule 422.03. Well, you should probably also put a
4 time line if you are going to require that information be
5 retained by the -- by the retailer what's a time line for
6 that if it -- if it even goes there and (inaudible). We
7 applaud the ability for analytics to be utilized in a co-
8 location and that being spelled out. So we do appreciate
9 that. There is an issue on -- I don't want to go -- that's
10 going to be too deep. Let's see. Let's go through some of
11 these because we are going to provide these, so -- in detail
12 with the rule set there so you won't have to - I do
13 appreciate the placing the standards for licensing
14 agreements in the rules and recognizing what those
15 management (inaudible). But again that goes back to
16 somewhat of the definitions of gross profits and that in
17 terms of controlling those licensing agreements and the
18 information you're trying to obtain out of there. And
19 that's in rule 421.12(a). Here is the other question, and I
20 know this has always been a struggle with Bureau of Fire
21 Services in terms of the NFPA. But in rule 4- -- 420.28,
22 Michigan is perhaps maybe the only state in the nation that
23 talks about grow facilities as industrial uses versus
24 manufacturing uses, which can make a big difference. And I
25 don't know -- I would just ask that the agency work with BFS

1 to see if there's not some changes that can be made in terms
2 of that construction code that they're using to set the
3 plans and everything for there. So I know that they're
4 undergoing those changes, and I don't know if in their 2021
5 version they've actually changed it. So it's no longer
6 industrial use, but recognized as a cannabis manufacturing
7 use because that sets out a whole different framework for
8 build outs. In 420.214, we would like to see that common
9 ownership be more broadly defined so that you could make
10 transfers among subsidiaries. As -- as you guys know and I
11 think everybody in the industry knows, you know, there's a
12 multitude of LLC's and businesses that are part of a parent
13 co. And without changing the names of each and every one to
14 reflect the same similar name, it is probably better to at
15 least recognize the subsidiaries and so you're able to
16 effectuate change transfers in between those -- those. That
17 probably could be clarified more. And we hope that that
18 would be there. We would also recommend in 420.214(b) that
19 the term adverse reaction be defined. It's pretty
20 subjective right now. And what -- because that triggers
21 reporting mandates, and so we need to have a better
22 definition of what an adverse reaction would be. Same way
23 with it -- the same in terms of a defective product, it's
24 kind of broad. Let's see. I don't want to take all the
25 time. And finally I think we do appreciate the issue or

1 the -- the MRA taking and -- and offering the declaratory
2 ruling set. We think that's a positive step for industry to
3 be able to submit a specific set of questions and ask for a
4 specific answer. What we do hope, though, is that that
5 doesn't -- that doesn't prohibit, you know, the -- the
6 customer give and take that we have with questions and
7 everything with -- with that. And that's in rule set 2021-
8 29. We're hoping that the agency will continue with that
9 open dialogue that -- that everybody has insured right now
10 with -- with staff. So -- and that the declaratory ruling
11 doesn't supplant that. Other than that, we -- we have a
12 bunch and we'll be submitting those by 5:00 o'clock today so
13 you'll be able to get all of those. Thank you so much.

14 MS. FOX: Next, Kellen Brandon.

15 COMMENTS

16 BY KELLEN BRANDON:

17 MR. BRANDON: Good morning. My name is Kellen
18 Brandon and I am a resident of Ingham County. And I am here
19 today in support of the language creating a new class A
20 marijuana microbusiness license rule set 2020-120 LR. I am
21 very excited about the rules as adopted. And I'm also
22 requesting that you implement the section of the rules
23 proposal without any alterations to the language. As a
24 current business owner currently focused in the publishing
25 industry, we specifically develop literature and events

1 focused on facilitating cultures that can better recognize
2 bias as well as strategies toward equitable opportunities
3 for success within the culture. This rule clearly checks
4 those boxes and mirrors that example before the marijuana
5 industry. It provides an opportunity to change the
6 narrative around stigma within the marijuana industry as
7 well as providing opportunities toward success via business
8 ownership for people of color like myself. It is well
9 researched and factual that, in large, people of color have
10 been left behind when it comes to ownership opportunities
11 within this industry. By keeping this language as is,
12 Michigan has the ability to lead the way and set ourselves
13 apart by providing an example of how to close gaps of equity
14 and opportunity in our state. Our community members of
15 color as well as all others within our community of the
16 marginalized many times have the skills to succeed, but lack
17 the capital to get started. By adapting this rule as is, we
18 will change that, starting with my own opportunity as a
19 local Lansing area business owner within the industry. This
20 is greatly about opportunity and leveling the playing field.
21 Again, please consider. Thank you.

22 MS. FOX: Next, Robin Schneider with the Michigan
23 Cannabis Industry Association.

24 COMMENTS

25 BY MS. SCHNEIDER:

1 MS. SCHNEIDER: The Michigan Cannabis Industry
2 Association is the leading voice for Michigan's legal
3 cannabis businesses. The association advocates for
4 responsible and successful medical and adult use cannabis
5 industry by promoting sensible laws and regulations and
6 industry best practices among members. We have submitted
7 lengthy comment already but due to the time constraints, I'm
8 just going to focus on the issues that were ranked as most
9 important to our members. Proposed rules 420.802(7) and
10 420.801(I), 420.801(j); the association opposes these
11 notifications requirements which when strictly construed are
12 unreasonably impractical. Moreover the term management or
13 other agreement excludes -- is overbroad and cuts against
14 the agency's proposed definition of employee, which excludes
15 trade or professional services. At a minimum, if the agency
16 persists with its notification requirements with respect to
17 management agreements, we respectfully request that the
18 agency consider revising the definition of management
19 agreement to mean any contract between a licensee and other
20 party for the provision of management services that allows
21 other parties to exercise control over or participate in the
22 management of the license. Such definition would be -- more
23 fairly mirror the statutory term managerial employee under
24 MCL 333.2710(2)©. Next, addressing amendments to portions
25 of rule 420.701 through 420.706 to clarify and/or strengthen

1 the MRA's hearing processes. The MICA supports without
2 exception the MRA's proposed rules for hearings. Proposed
3 rules 420.103(3) and 420.104(4) deletes language authorizing
4 marijuana processors and retailers respectively with two or
5 more licenses at different establishments from transferring
6 inventory between licensed establishments owned by the
7 licensee. The association opposes this change for reason
8 that such transfers between license locations promote
9 flexibility and help prevent product waste. This change may
10 also cause financial harm to our members. Proposed rule
11 420.112(a) creates a new regulatory regime whereby the MRA
12 seeks to require all licensing agreements and management
13 agreements of marijuana to be submitted to the MRA for
14 review. The MICIA opposes these new filing and approval
15 requirements and submits that the agency appears to lack
16 statutory and/or rule making authority for this expansion of
17 government regulation. We believe this is overbroad and
18 cuts against the agency's proposed definition of employee,
19 which -- I've already covered that one. Okay. Moving
20 along. Proposed rule 420.43 deletes language providing that
21 each applicant shall disclose all shareholders holding a
22 direct or indirect interest of greater than 5 percent.
23 Officers and directors in the proposed marijuana
24 establishment and it adds language providing that each
25 applicant shall disclose the identity of every person having

1 over a 2.5 percent or greater ownership interest. The MRCA
2 opposes this more stringent disclosure requirement for a
3 diminished ownership interest. It is unnecessary, will
4 jeopardize licensee funding, is unreasonably impractical and
5 will, most importantly, retroactively impair existing
6 contracts. Proposed rule 426.6, the MICA acknowledges that
7 this language tracks and then expands on the language
8 provided in MCL 333.2740(9). Nonetheless, the MICA opposes
9 this language for the reason that it may be legally
10 incorrect where a licensee has been issued -- issued
11 substantial investments made and the state law only
12 authorizes license revocation for this cause. Regardless of
13 whether the MRA's assertions are legally correct, it is
14 patently unfair to deny the existence of a property right
15 where substantial investments are made based on licensure
16 and such licensees may only be revoked for good cause. Is
17 that my timer?

18 MS. FOX: Yes, ma'am.

19 MS. SCHNEIDER: All right. I'm going to give one
20 more. And you guys already have all of this (indicating).
21 Finally our members are requesting that their employees have
22 more access to water regularly in common areas throughout
23 their facilities rather than just in the break room to help
24 prevent dehydration. We appreciate the opportunity to
25 participate and thank you to the agency for making Michigan

1 a national leader in the cannabis industry.

2 MR. HARNIS: When it's your turn to speak, if you
3 can, get right up into the microphone, just a couple inches
4 away, that way everybody on the screen and on the webinar
5 can hear you clearly. Thank you.

6 MS. FOX: Okay. Next is Joseph Cranmore from Five
7 Point Farms.

8 COMMENTS

9 BY MR. CRANMORE:

10 MR. CRANMORE: Hi, my name is Joseph Cranmore.
11 And I'll be short. I want to echo what this (indicating)
12 gentleman said about the -- the class A microbusiness, I
13 believe it's 421.05(a) talking about the changes. The
14 additional plant count is fantastic. It makes it a little
15 more sustainable. But our entire business model is built on
16 everything -- you know, seed to shelf everything coming from
17 one place, cared for by hand, you know. Essentially taking
18 away the processing piece of that would then put us
19 in direct competition with the larger businesses who are
20 essentially then selling the same products but probably at
21 a -- at a higher cost due to the fact that we're a much
22 smaller business and we're not purchasing as much. So
23 that -- again, addition by subtraction, increasing the cost
24 of the license for the class A microbusiness. And then
25 tacking on another potentially \$24,000 to purchase and go

1 through the -- the processing licensing is just -- I think
2 again it puts that out of reach for social equity
3 applicants. I am one myself. So I just -- again, just want
4 to make sure that somebody's up here saying that this is not
5 necessarily helping. It's almost like that commercial, you
6 know, the -- "You got to be quicker than that," the
7 insurance commercial where they hold the dollar out. That's
8 great, but we're -- again, we're kind of trying to help by
9 pulling something out of -- out of reach. So that's really
10 all I have. If this is going to replace the current
11 microbusiness license, I think that's a terrible idea. If
12 it's in addition to, then I think we could do some tweaking
13 to make that ideal for everyone. But again if it's -- if
14 it's going to replace the current microbusiness license with
15 the \$8,000 cost, I think you're -- we're shooting a lot of
16 people before they even get started. So -- and that's all I
17 have to say. Thank you.

18 MS. FOX: Next is Michael Johnson. And I do
19 apologize. I cannot read who you are representing.

20 MR. JOHNSON: I didn't have anything.

21 MS. FOX: Okay. Thank you. Next, then, Travis
22 Copenhaver.

23 COMMENTS

24 BY MR. COPENHAVER:

25 MR. COPENHAVER: Thank you, good morning; Travis

1 Copenhaver. I just have some -- two pretty specific
2 comments, and then I will provide more details to -- written
3 response by the end of the day. I think the single most
4 frustrating administrative rule we've had to deal with at
5 least in my practice over the last few years has been the
6 definition of applicant. It's been touched on by a few
7 speakers before me are. I would encourage -- I think if you
8 actually go and see if it's -- at least 420.1 -- 1(c)(1),
9 but it's -- it's used in several rules as well. I would
10 encourage the -- the MRA to consider perhaps breaking that
11 definition down by corporate form to be more specific about
12 what they are actually intending to capture with phrases
13 like "exercise control and participate in the management
14 thereof." It becomes very frustrating from a applicant
15 perspective when we're preparing things like their
16 qualification is trying to interpret what those phrases
17 mean. I think they would be appropriate for definitions of
18 their own. It might be more easy to be more nuanced with
19 that if you actually kind of break it down between LLC and
20 corporation, trust, et cetera. Additionally, I think in
21 rule 420.4, we talk about the disclosure thresholds and
22 there's some new language in there about having a 2 and a
23 half percent or 5 percent. Two comments there. I would
24 encourage -- one, I think a 5 percent threshold on direct or
25 indirect ownership is very appropriate when you actually try

1 to capture what your -- what your goals are in background
2 checking these organizations and looking for the types of
3 things that would be concerning to your agency. I think
4 that if you are to come up with some thresholds, they should
5 be equally applied regardless of corporate form. I know
6 that we have some discussion at 2 and a half percent, 5
7 percent. I think the 5 percent threshold on that disclosure
8 for both medical and adult use would be very appropriate.
9 That would be my suggestion to you as you move forward.
10 That would prevent some significant burden, some disclosure
11 requirements for a lot of corporations and -- and
12 organizations that are out there attempting to participate
13 in Michigan. It would save a significant amount of work for
14 the applicants as well as for the agency to determine who
15 those individuals are. And if there are anyone who have
16 insignificant ownership that would otherwise be
17 participating in management, it would be easier to capture
18 those organizations or individuals through the management
19 triggers of your definition such as the definition of
20 applicant. There are several other comments I'll make in
21 writing I would like to share as well. But thank you for
22 your time. I really appreciate it.

23 MS. FOX: Hayley Tomich, Michigan Investments --
24 is it 10? -- Inc.

25

COMMENTS

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1 BY MS. TOMICH:

2 MS. TOMICH: Can you hear me? Hi, my name is
3 Hayley Tomich. I'm here on behalf of Michigan Investments
4 10, Inc. I wanted to come make comment in support of
5 proposed rule change 420.303 subsection 6 in which this
6 proposed rule would allow processors to transfer untested
7 fresh frozen material to another processor, either adult use
8 or medical. Representing a processor now, we've run into
9 this issue in the past where we are only able to receive the
10 fresh frozen transfer from a cultivator. And so we wanted
11 to voice our support for this rule. And then to be able to
12 transfer the fresh frozen product to another processor and
13 then have it tested in its final form when it's extracted
14 out of a concentrate. Thank you.

15 MS. FOX: Is there anyone else who would like to
16 make public comment? If so, please submit your public
17 comment card. Okay. So at this time, what we're going to
18 do is take a short recess in that no one else has public
19 comment. We will reconvene at 11:00 a.m.

20 (Off the record)

21 MS. FOX: Good morning, everyone. It's 11:00 a.m.
22 And we're going to go ahead and call the hearing back to
23 order. Again, if you would like to make public comments,
24 please make sure that you've filled out your comment card
25 and that you have provided it. Okay. So I have a comment

1 card, Tiffany Coleman, CarbideX/Franklin Fields of Michigan
2 ASA.

3 COMMENTS

4 BY MS. COLEMAN:

5 MS. COLEMAN: Thank you again for the opportunity
6 to comment. I had some more items for this second part. So
7 first I would like to show support for the change to
8 420.207(a) specific to contactless curbside delivery
9 options. So thanks for putting that in. It looks great.
10 You guys are awesome. I would also like to show support for
11 the expansion of research and development license for our
12 universities and whatnot and 420.2(1)(e), that is near and
13 dear to my heart for research. And it is very, very
14 important for our industry as a whole. And now we'll have a
15 means of allowing that to happen in a more legal space. So
16 thank you. In addition, I would like to ask that all
17 license types be treated uniformly. And it appears that
18 with 420.23(11) that the largest license holders will no
19 longer be charged for application fees for their excess
20 growers licenses. It seems like that would no longer be
21 treating all license types fairly since now they get to
22 apply for free, I guess. I mean, only if you have, you
23 know, seven licenses do you get this opportunity. Okay.
24 And then for 2021-10 LR on employees, it appears that you
25 guys have expanded the use of 21 CMR part 117, which is, you

1 know, specific to food handling and the like from the FDA.
2 I do support these regulations. However, I would also like
3 us to acknowledge that the monitoring and enforcement for
4 the FDA of these things is incredibly difficult. And one
5 would think that it would also be incredibly difficult for
6 compliance officers and the like in the MRA to be able to be
7 able to uniformly monitor and enforce across all companies.
8 It also appears that this is a significant change given that
9 there was no specificity on the types of employees that are
10 impacted by this. It was broadly safe for all employees. I
11 believe currently it's only for employees that work at
12 edible and infused product manufacturers. I may be
13 misunderstanding the law. And lastly, in 2020-122 LR, there
14 is an addition of an SOP section, which I greatly support
15 but also again acknowledge the difficulty in monitoring and
16 enforcing the existence of this program. I know that in
17 other regulatory industries, this is one of the hardest
18 things. And so it may be appropriate to provide some
19 additional guidelines for what kind of SOP's, minimums and
20 also the kind of content that you're expecting to see to
21 make that process a little more seamless for those of us
22 that will be trying to comply with your rules. Thank you
23 for your time.

24 MS. FOX: Is there anyone else who would like to
25 make public comment who has not filled out a comment card?

1 Please do that now. Okay. Seeing no one with any
2 additional comment, the hearing will recess until 1:00 p.m.

3 (Off the record)

4 MS. FOX: Good afternoon. We are back on the
5 record. It is 1:03 p.m. And we are back for the public
6 hearing on the proposed administrative rules. At this time,
7 is there anyone who would like to submit public comment on
8 the administrative rules? If so, please submit your public
9 comment card.

10 MR. BRISBO: Hearing no further comment, I hereby
11 declare the hearing closed. Any additional comments
12 regarding the proposed rules may be shared in writing to
13 MRA-legal@michigan.gov. Written testimony on the rules must
14 be received by September 27th, 2021 at 5:00 p.m. The
15 current time is 1:04 p.m. And we are adjourned.

16 (Proceedings concluded at 1:04 p.m.)

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