1. Working group name:

*Operations - Production/ Manufacturing*

1. Individual sponsor(s):

*Bill Erlach – City of Reno Fire Department*

*Bryan Hyun – Owner/ Operator – The Grove*

*Meg Collins - Good Chemistry*

*Jake Ward – Pure Tonic Concentrates*

1. Describe the recommendation:

*Due to the possession and purchase limits put in place by Question 2 for marijuana and concentrated marijuana, there is some confusion regarding the difference between marijuana flower, marijuana edibles, and marijuana concentrates. This recommendation is intended to add clarity to the regulation of concentrated marijuana as it relates to other marijuana product types.*

1. Which guiding principle(s) does this recommendation support?

*Guiding Principle 2 - Be responsive to the needs and issues of consumers, non-consumers, local governments and the industry*

*Guiding Principle 4 - Propose efficient and effective regulation that is clear and reasonable and not unduly burdensome*

*Guiding Principle 6 - Establish regulations that are clear and practical, so that interactions between law enforcement (at the local, state and federal levels), consumers, and licensees are predictable and understandable*

1. What provision(s) of Question 2 does this recommendation apply to?

*NRS 453D.030 (2) - “Concentrated marijuana” means the separated resin, whether crude or purified, obtained from marijuana.*

*NRS 453D.110 (1) - Possess, use, consume, purchase, obtain, process, or transport marijuana paraphernalia, one ounce or less of marijuana other than concentrated marijuana, or one-eighth of an ounce or less of concentrated marijuana;*

1. What issue(s) does the recommendation resolve?

*The need to clearly define what concentrated marijuana is and how it relates to other marijuana types for the regulation of retails sales and personal possession limits.*

1. Was there dissent in the group regarding this recommendation? If yes, please provide a summary of the dissenting opinion regarding the recommendation.

*No dissent.*

1. What action(s) will be necessary to adopt the recommendation? Will statute, policy, regulations, etc. need to be addressed?

*1. A regulation should be put into place that takes topical and edible marijuana out of the possession and purchase restrictions outlined in 453D.110 (1).*

*a. Edible marijuana infused products will be regulated by stringent THC limits related to serving size and packaging limitations as outlined in other Production / Manufacturing Work Group recommendations.*

*b. Topicals should not be included in the possession and purchase limits outlined by Question 2. The THC in topical preparations are not used or consumed in a manner that would activate the psychoactive effects of the amounts of THC that may be in topical products.*

*2. Question 2 allows a consumer to “possess, use, consume, purchase, obtain, process or transport…one ounce or less of marijuana, or one-eighth of an ounce or less of concentrated marijuana. Since there will be cases where an individual may purchase and possess a mixture of marijuana products (concentrated marijuana, marijuana infused edible products, and marijuana flower) then equivalency factors should be developed and put into place so that decisions can be made upon retail sale and in the field by law enforcement.(The Medical Marijuana regulations found in Section 453A.704 contains guidelines for equivalent purchase limits for medical marijuana patients.)*

*3. It is important that a comprehensive training program be developed and be administered to law enforcement so that a clear distinction between product types can be made in the field.*

*4. Retail dispensaries should develop and administer training to management and their sales staff that ensures that they understand the sales limitations of marijuana products and concentrate, and the likely combinations thereof, to ensure that all sales are compliant with respect to purchase and possession limits.*

1. Additional information (cost of implementation, priority according to the recommendations, etc).

*The proposed Nevada equivalency chart is attached below.*

