1. Working Group Name:

*​ Transportation, Storage and Disposal Working Group*

1. Individual Sponsor(s):

*Joe Pollock, Deputy Administrator, DPBH, NV Medical Marijuana Program*

*Tim Conder - Blackbird Transportation*

1. Describe the Recommendation:

*Requirements concerning storage of marijuana at a licensed distributor:*

*1. At each marijuana distributor, marijuana must be stored only in an enclosed, locked*

*facility.*

*2. At each marijuana distributor, marijuana must be stored in a secure, locked device,*

*cabinet or room or locked transportation vehicle within the enclosed, locked facility. The secure, locked device or room*

*must be protected by a lock or locking mechanism that meets at least the security rating*

*established by Underwriters Laboratories for key locks.*

*3. Distributor premises shall be made available for inspection by the department during*

*normal business hours without notice.*

*4. Marijuana products shall not be stored with the distributor for more than (3) days*

*without written consent from the Department*

 *If the product is removed from the vehicle for storage, the inventory shall be verified following off-load and prior to on-load.*

*The tracking system requirements shall be consistent with current NAC 453A requirements for establishments.*

1. Which Guiding Principle(s) does this recommendation support?

*Guiding Principle 1 - Promote the health, safety, and well-being of Nevada’s communities*

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

*governments and the industry*

*Guiding Principle 3 - Ensure that youth are protected from the risks associated with marijuana, including preventing the diversion of marijuana to anyone under the age of 21*

*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*

*Guiding Principle 7 - Take action that is faithful to the text of Question 2*

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

*NRS 453D.200 (1)(c),(d),(g), and (h): 1.  Not later than January 1, 2018, the Department shall adopt all regulations necessary or convenient to carry out the provisions of this chapter. The regulations must not prohibit the operation of marijuana establishments, either expressly or through regulations that make their operation unreasonably impracticable. The regulations shall include: (c) Requirements for the security of marijuana establishments; (d) Requirements to prevent the sale or diversion of marijuana and marijuana products to persons under 21 years of age; (g) Requirements for record keeping by marijuana establishments; and (h) Reasonable restrictions on signage, marketing, display, and advertising.*

*NRS 453D.300 (1) & (5) ​   ​In addition to requirements established by rule pursuant to ​NRS 453D.200 ​:*

*1.  Marijuana establishments shall:*

*(a) Secure every entrance to the establishment so that access to areas containing marijuana is*

*restricted to persons authorized to possess marijuana;*

*(b) Secure the inventory and equipment of the marijuana establishment during and after operating hours to deter and prevent theft of marijuana;*

*(c) Determine the criminal history of any person before the person works or volunteers at the*

*marijuana establishment and prevent any person who has been convicted of an excluded felony offense or who is not 21 years of age or older from working or volunteering for the marijuana establishment.*

*5.  A marijuana establishment is subject to reasonable inspection by the Department, and a person who holds a marijuana establishment license must make himself or herself, or an agent thereof, available and present for any inspection required by the Department. The Department shall make reasonable accommodations so that ordinary business is not interrupted and safety and security procedures are not compromised by the inspection.*

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

*​ Storage requirements for distributors*

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

*One member had concerns with storage requirements during transportation.*

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

*Storage requirements added to regulation for the recreational marijuana program*

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

*The intent of this recommendation is not to create distribution centers. Storage will be allowed only as normal business operations of the transportation process.*