



November 15, 2019
Via email

Subject: Public Comment on 3 AAC 306, dealing with umbrella categories for products

Dear Honorable Marijuana Control Board Members:

Thank you for the opportunity to comment on the proposed regulations.

The proposed regulation should **not be adopted as written**. While the AMIA believes the intent of the project to be sound, the current draft doesn't seem to achieve much other than to move same or similar language from one section to another. This does little to establish the legality of umbrella categories. Therefore, we urge this project to be sent to a working group or an appropriate committee.

We have provided many comments recently to this board, and a recurring theme is the hope that regulators utilize expertise through working groups and committees. In this way, regulations will be promulgated with more thought and efficiency. Communicating with experts not only saves the state money in Reimbursable Services Agreements to the Department of Law, but also saves the industry time and money. Attempting to comprehend and implement changes to regulations that often have no bearing in logic only distracts these businesses from generating commerce.

An appropriate committee or working group on the subject of umbrella categories should include at least one industry member familiar with drafting and reviewing regulations and at least one industry member familiar with product manufacturing. We assure you that these individuals exist. Crafting common sense rules and regulations is a complex challenge.

The responsibilities of the MCB are daunting and its work will be criticized. While the AMIA cannot prevent loud opposition, we can continue to offer our collective knowledge and willingness to show up at the table.

Thank you for your continued commitment to our state, our communities, and this industry.

Respectfully,

Alaska Marijuana Industry Association
Board of Directors

The Alaska Marijuana Industry Association is Alaska's only statewide cannabis industry trade group. Our mission is to promote and advocate for a vibrant and reasonably regulated Alaska-based marijuana industry. The AMIA serves to strengthen and enhance a network of connected, independent, informed, regionally and community directed Alaska marijuana organizations.

www.alaskamarijuanaindustry.org