



October 25, 2019

Via email

Subject: Public Comment on 3 AAC 306 of the Alaska Administrative Code, dealing with Infants on Premises

Dear Honorable Marijuana Control Board Members,

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

The Alaska Marijuana Industry Association generally supports the proposed regulation change dealing with Infants on Premises, which was released for public comment on September 20.

We believe the proposed change will allow parents and caregivers employed in the industry freedom to continue work during the precious early stages of child rearing. This proposed regulation will also allow cannabis businesses that are able to do so the opportunity to provide parents and guardians an on-site location to feed their children.

Although the AMIA acknowledges this proposed regulation change is a step in the right direction, we also strongly believe that it does not go nearly far enough to end discrimination against parents involved in the cannabis industry. The allowance of children in restricted areas should be extended to all school-aged children.

Further, customers that visit retail locations should be allowed to have their children accompany them into the retail space when shopping. The AMIA has received reports from retailers of parents leaving children unattended in vehicles while shopping at retail cannabis locations. Unfortunately, this is occurring commonly enough to be a significant public safety issue.

This issue can easily be addressed by removing the restriction that prohibits school-aged children from entering a licensed retail facility with their parent or guardian. If this regulation was removed, licensees could create their own opt-out policies (similar to the concept of a "house policy" in the alcohol industry) regarding whether to allow school-aged children at the licensed businesses.

Compare with alcohol rules that state persons under the age of 21 may not enter or remain on licensed premises unless accompanied by a parent, legal guardian or spouse over the age of 21 years. Notwithstanding this rule, licensees may exclude underage persons from licensed premises at any time.

There is also a technical error observation that 3 AAC 306.325 needs to be amended, as there is still a blanket under 21 prohibition under that section.

We commend the Alaska Marijuana Control Board for proposing regulations that positively impact the lives of Alaskans employed in the cannabis industry. We also thank the Alcohol and Marijuana Control Office for their work on producing this draft. We hope that the Marijuana Control Board will continue to help improve workplaces in the cannabis industry by taking this regulation further by removing additional barriers for parents and caregivers.

Thank you for your consideration,

Alaska Marijuana Industry Association
Board of Directors