



**CALIFORNIA
CANNABIS
INDUSTRY
ASSOCIATION**

PUBLIC COMMENTS TO CDPH

The California Cannabis Industry Association (CCIA) was formed to unite the legal cannabis industry to help educate and act as a resource to lawmakers and our members. Our unified voice includes over 460 California businesses representing nearly 650 brands and approximately 10,000 employees. We would like to thank the California Department of Public Health (CDPH) for their hard work in crafting the proposed draft permanent regulations. We appreciate the time and diligent efforts the CDPH has extended to address the concerns of the cannabis industry as well as ensuring the safety of patients and consumers of cannabis products.

CCIA, representing a collective group of California cannabis industry businesses and its customers, along with our supply chain committees and Board of Directors, would like to take this opportunity to submit these comments to the draft two of the permanent regulations.

Our comments seek to optimize the draft permanent regulations by addressing the business concerns of the cannabis industry as well as clarify public safety issues. The objective is not to reject regulation but rather to enhance regulations to combat the illicit market and support the newly regulated cannabis industry, pushing it towards success both commercially as well as maintaining patient and consumer safety.

In implementing the draft permanent regulations we ask that the CDPH be thoughtful of the industry as a whole. While there are some large commercial cannabis businesses, many are small and independently operated, and new to regulated markets. CCIA has found its members are eager to comply with issued regulations but at the same time overwhelmed by the financial and logistical burdens of implementation.

We thank the CDPH for its review and objective consideration of these comments.

§40417. Child-Resistant Packaging Requirements.

Concern: CCIA spent hundreds of hours discussing the nuances of child resistant packaging, exit bags, liability, and public perception during the last 45 day public comment period. Every angle was reviewed and debated, and every outcome was weighed. Our committees, committee chairs, and board of directors came to consensus in support of the original text of section 5413, and continue to stand behind child resistant packaging being met by exit bags.

We also believe CRP should not be required for business to business transfers and would like to see that clarified in the current regulations. This adds an increased burden that is unnecessary for public safety or product integrity.

Recommendation: We recommend that changes proposed be stricken and that the CDPH adopt the language, as proposed in the original draft released in July.

We would also like to request that if CRP is required that an exit bag not also be required.

