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June 27, 2019

The Honorable Evan Low
Assemblymember, 28th District
State Capitol, Room 4126
Sacramento, CA 95814

**RE: AB 1529 (Low) Cannabis: universal symbol.
COSPONSOR/SUPPORT**

Dear Assemblymember Low:

The California Cannabis Industry Association is pleased to co-sponsor Assembly Bill 1529, as amended on June 27, 2019. This bill corrects an oversight when the California Department of Public Health (CDPH) issued its final regulations for cannabis earlier this year.

Specifically, this bill modifies the size and color requirements of the universal symbol when placed on cannabis vaporizing devices, otherwise referred to as vape cartridges. The modifications, as proposed in this bill, will not only ease the cost burdens associated with having to hand-sticker cannabis vape cartridges, but strengthen the intent of CDPH's regulations to ensure that consumers and medicinal patients understand what they are consuming.

Existing cannabis law requires that certain information be listed on the packaging of finished cannabis products, including the placement of a universal symbol, which was further specified in regulations. When CDPH released its final regulations for cannabis in January it added a requirement that the universal symbol be placed on the actual vape cartridge, in addition to the external packaging. While this requirement is modeled after a similar requirement in Oregon, under California's regulations the universal symbol must be printed in black ink and measure at least 0.5" x 0.5" in size. While the cannabis industry supports efforts to ensure that consumers are aware of the products they are using, vape cartridges, which are cylindrical in form, typically have a diameter of less than one-quarter inch and cannot practically accommodate the universal symbol at that size.

We would further note, there is currently no automation process that allows businesses to directly engrave or machine label cartridges with a universal symbol of 0.5" x 0.5." This means that, unless addressed, cannabis manufacturers must hand-sticker universal symbols on cartridges - a time consuming and expensive process, which is ultimately passed on to the consumer. Moreover, the current size requirement for the universal symbol covers most of the visible cannabis oil and leaves little room for manufacturers to label other important consumer information such as strain names or potency levels. Consumers of these products should be able to easily determine how much product is contained in a vape cartridge as well as precisely what they are consuming.

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AB 1529 offers a straightforward solution to the industry's current predicament by amending the size requirement of the universal symbol on vape cartridges to be "no less than 0.25" x 0.25." This size adjustment will allow cannabis manufacturers to automate the process of applying the universal symbol on their products, while preserving the overall intent of the law to ensure consumers understand what they are consuming.

For these reasons, the California Cannabis Industry Association is pleased to co-sponsor AB 1529 and thanks you for your leadership on this critical issue for California's compliant cannabis industry.

Sincerely,

A handwritten signature in black ink that reads "Lindsay Robinson".

Lindsay Robinson,
Executive Director

