



Cannabis Control Commission Public Meeting

March 13, 2025

Hybrid



Meeting Book - March Cannabis Control Commission Monthly Public Meeting

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March 11, 2025

In accordance with Sections 18-25 of Chapter 30A of the Massachusetts General Laws and Chapter 2 of the Acts of 2023, notice is hereby given of a meeting of the Cannabis Control Commission. The meeting will take place as noted below.

CANNABIS CONTROL COMMISSION

**March 13, 2025
10:00 AM**

In-Person and Remote via [Microsoft Teams Live*](#)

PUBLIC MEETING AGENDA

- I. Call to Order
- II. Commissioners' Comments & Updates
- III. Minutes
 1. February 13, 2025
 2. February 18, 2025
- IV. Executive Director and Commission Staff Report
 1. Operational Updates *Executive Director Travis Ahern*
 2. Licensing Data Updates *Director of Licensing Olivia Koval*
 3. Workforce Updates *Chief People Officer Debbie Hilton Creek*
 4. Diversity, Equity and Inclusion Updates *Director of Diversity Equity and Inclusion Sudeshna Chatterjee*
- V. Staff Recommendations on Renewal Licenses
 1. ARL Healthcare Inc. (#MRR207015)
 2. Ashli's Extracts, Inc. (#MPR244243)
 3. Ashli's Farm, Inc. (#MCR140818)
 4. Ashli's, Inc. (#MRR207027)
 5. Baked Beans Farm LLC (#MPR244189)
 6. Beacon Compassion, Inc. (#MRR207219)
 7. Berkshire Roots, Inc. (#MXR126678)
 8. Berkshire Roots, Inc. (#MCR140901)
 9. Berkshire Roots, Inc. (#MPR244314)



10. Buudda Brothers LLC (#MCR140750)
11. Buudda Brothers LLC (#MPR244194)
12. CannaVanna, Inc. (#MRR207148)
13. CommCan, Inc. (#MRR206877)
14. Coyote Cannabis Corporation (#MCR140913)
15. Coyote Cannabis Corporation (#MPR244316)
16. Elevated Roots II LLC (#MRR206913)
17. Elevated Roots, LLC (#MRR206907)
18. ELEVATION RETAIL II LLC (#MRR207116)
19. FFD Enterprises MA (#MRR206977)
20. Gan Or LLC (#MDR272573)
21. Gan Or LLC (#MPR244211)
22. Gas Bus LLC (#MDR272579)
23. Green Era LLC (#MRR207080)
24. Greenjeans Farms, LLC (#COR129715)
25. GTE Taunton LLC (#MRR207191)
26. Holistic Health Group Inc. (#MRR207004)
27. Holistic Industries, Inc. (#MRR207213)
28. JMK Gardening, LLC DBA Wonderland-Cannabis Co (#MRR207161)
29. Leaf Lux Group Inc. (#MRR207082)
30. New Dia, LLC (#MRR207136)
31. Pudding Hill Farm LLC (#MCR140863)
32. Resinate, Inc. (#MRR207151)
33. Rooted In, LLC (#MRR207206)
34. Sanctuary Medicinals, Inc. (#MPR244300)
35. Slang, Inc. (#MRR207147)
36. Solar Therapeutics, Inc. (#MRR206955)
37. Sweetgrass Botanicals Extractions LLC (#MPR244207)
38. Sweetgrass Botanicals LLC (#MRR206965)
39. T. Bear Inc. (#MPR244277)
40. The Heirloom Collective, Inc. (#MRR207214)
41. True East Leaf LLC (#MCR140756)
42. True East Leaf LLC (#MRR206950)
43. Western Front, LLC (#MRR207125)
44. Alternative Compassion Services, Inc. (#RMD3320)
45. Green Gold Group, Inc. (#RMD786)



- VI. Staff Recommendations on Provisional Licenses
 - 1. Ember Gardens Boston, LLC (#MRN284206), Marijuana Retailer
- VII. Staff Recommendations on Final Licenses
 - 1. Haze of Grafton, LLC (#MR282399), Marijuana Retailer
 - 2. Lazy River Products – Tewksbury, LLC (#MR284805), Marijuana Retailer
 - 3. Richards Flowers, LLC (#MB282225), Marijuana Microbusiness
 - 4. Green Gold Group, Inc. (#RMD4217-R), Medical Marijuana Treatment Center
- VIII. Staff Recommendations on Responsible Vendor Training Renewal Licenses
 - 1. 420 Trainers LLC (#RVR453152)
- IX. Commission Discussion and Votes
 - 1. Delivery Exclusivity Working Group Recommendation *Deputy General Counsel Michael Baker (Vote)*
 - 2. Job Description: Data Analyst *Chief People Officer Debra Hilton-Creek, Chief Technology and Innovation Officer Paul Clark (Vote)*
 - 3. Tipline Update *Commissioner Kimberly Roy, Chief Technology and Innovation Officer Paul Clark, Chief of Investigations and Enforcement Nomxolisi Jones*
 - 4. Recommendation to Amend Section 5.4 of the Testing Protocol and Amend Administrative Order No. 4 Requiring Licensees to Submit Full Panel Test Sample for Required Compliance Testing *Chief of Investigations and Enforcement Nomxolisi Jones (Vote)*
 - 5. Executive Session Minutes *General Counsel Kajal Chattopadhyay (Vote)*
 - i. September 14, 2023
 - ii. September 29, 2023
 - iii. October 10, 2023
 - iv. October 25, 2023
 - v. November 1, 2023
 - vi. November 7, 2023
 - vii. November 14, 2023
- X. Executive Session
 - The Commission may enter closed executive session to review executive session meeting minutes pursuant to G.L. c. 30A, § 21(a)(7) and G.L. c. 30A, §§ 22(f), (g).*
- XI. New Business Not Anticipated at the Time of Posting
- XII. Next Meeting Date
- XIII. Adjournment

*Closed captioning available



If you need reasonable accommodations in order to participate in the meeting, contact the ADA Coordinator Debra Hilton-Creek in advance of the meeting. While the Commission will do its best to accommodate you, certain accommodations may not be available if requested immediately before the meeting.



CANNABIS CONTROL COMMISSION

February 13, 2025

10:45 AM

Remote via [Microsoft Teams Live*](#)

PUBLIC MEETING MINUTES

Documents:

- Application Materials associated with:
 - Staff Recommendations on Changes of Ownership
 - Staff Recommendations on Renewal Licenses
 - Staff Recommendations on Provisional Licenses
 - Staff Recommendations on Final Licenses
- [Meeting Packet](#)

In Attendance:

- Commissioner Nurys Z. Camargo
- Commissioner Kimberly Roy
- Acting Chair Bruce Stebbins

Minutes:

- I. Call to Order
 - The Acting Chair (AC) recognized a quorum and called the meeting to order.
 - The AC gave notice that the meeting is being recorded.
 - The AC gave an overview of the agenda.
- II. Commissioners' Comments & Updates – 00:02:02
 - Commissioner Camargo invited listeners to the upcoming medical-use listening session on February 27th and stated that she would have an update on the topic of delivery to no-towns at the March meeting. She stated that she would be standing in for Commissioner Concepcion in the delivery exclusivity period working group and was working with Commissioner Roy on an awareness campaign for Social Consumption. Commissioner Roy noted that February was Black History Month and stated that constituent feedback on testing was being taken into consideration and that the topic needed to be addressed quickly. She requested that the tip-line topic be placed on the agenda for the next regular meeting. The AC stated that he had attended the opening of Primus in Springfield.



III. Minutes for Approval – 00:14:29

- October 11, 2024
- Commissioner Camargo moved to approve the October 11, 2024, Commission Public Meeting minutes.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the October 11, 2024, Commission Public Meeting minutes.

- November 8, 2024
- Commissioner Roy moved to approve the November 8, 2024, Commission Public Meeting minutes.
- Commissioner Camargo seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the November 8, 2024, Commission Public Meeting minutes.

- December 12, 2024
- Commissioner Camargo moved to approve the December 12, 2024, Commission Public Meeting minutes.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the December 12, 2024, Commission Public Meeting minutes.

- December 17, 2024
- Commissioner Roy moved to approve the December 17, 2024, Commission Public Meeting minutes.
- Commissioner Camargo seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes



- The Commission unanimously approved the December 17, 2024, Commission Public Meeting minutes.

- December 18, 2024
- Commissioner Camargo moved to approve the December 18, 2024, Commission Public Meeting minutes.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the December 18, 2024, Commission Public Meeting minutes.

- January 9, 2025
- Commissioner Roy moved to approve the January 9, 2025, Commission Public Meeting minutes.
- Commissioner Camargo seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the January 9, 2025, Commission Public Meeting minutes.

- January 17, 2025
- Commissioner Camargo moved to approve the January 17, 2025, Commission Public Meeting minutes.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the January 17, 2025, Commission Public Meeting minutes.

- January 23, 2025
- Commissioner Roy moved to approve the January 23, 2025, Commission Public Meeting minutes.
- Commissioner Camargo seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes



- AC Stebbins – Yes
- The Commission unanimously approved the January 23, 2025, Commission Public Meeting minutes.

IV. Acting Executive Director and Commission Staff Report – 00:22:58

1. Operational Updates

- Acting Executive Director Debra Hilton-Creek (AED Hilton-Creek) provided an update on recruitment and explained that she planned to restructure the Constituent Services department to better serve the needs of patients. Commissioner Roy requested data on recruitment and asked to be involved in the restructuring process. Commissioners discussed their intent to address the needs of Registered Qualifying Patients and how they hoped to hear from patients, doctors and Medical Marijuana Treatment Centers (MTCs) at the February 27th listening session. Commissioner Roy noted that the topics of vertical integration, digital patient cards and renewal dates needed to be discussed at an upcoming policy meeting.

2. Executive Director Onboarding Update

- Chief of Staff Andrew Carter (Chief Carter) provided an overview on the plan for onboarding the new Executive Director (ED) Travis Ahern and the documents which were being compiled to bring him up to date. He stated that internal and external engagements were being planned to introduce the ED to staff and stakeholders. The AC suggested including specific preparations for the March Public Meeting and Commissioner Camargo requested that Commissioners be kept in the loop throughout onboarding. Commissioner Roy suggested including information on the budget request and to work on establishing goals. Commissioners discussed the need to establish short and long-term goals and the AC stated that a document would be circulated offline to gather feedback. Commissioner Camargo noted that the introductory meetings with departments as scheduled may be too short and suggested providing more time.
- The Commission took a brief recess. (Returned at 01:24:01.)

3. Chapter 180 Implementation Update

- General Counsel Kajal Chattopadhyay (GC Chattopadhyay) introduced the topic and explained the Legal department's involvement with the completion of Chapter 180 deliverables. Chief of Investigations and Enforcement Nomxolisi Jones (Chief Jones) explained how Chapter 180 implementation involved every department of the Commission and provided an overview of the status of deliverables. She stated that currently the Commission was in phase two of rollout which focused on municipal equity. She clarified for Commissioner Roy that there were currently 73 incomplete deliverables and 208 which had been completed. Chief Technology and Innovation Officer Paul Clark (Chief Clark) discussed how policy decisions of the Commission were implemented with third-party vendors and Commissioner Roy suggested reorganizing guidance documents related to Chapter 180 in one place on the



Commission's website, which Chief Clark stated could be done. AED Hilton-Creek described strategy meetings which staff had been conducting and the AC asked to be involved in the next meeting.

4. Licensing Data Updates

- Director of Licensing Olivia Koval (Director Koval) presented highlights from Licensing data. She noted that since the last meeting, approximately 100 additional Host Community Agreements (HCAs) had been approved. She noted a previous request for a timeline on processing Changes of Ownership (COOs) at the last Public Meeting and stated that for individuals the average timeframe for processing was 2-2.5 months and 3.5 months for entities. Commissioner Roy requested data on the total number HCAs of which were deemed noncompliant.
- The Commission took a brief recess. (Returned at 02:28:46.)

V. Staff Recommendations on Changes of Ownership

- Licensing Manager Anne DiMare (Manager DiMare) presented on behalf of the Licensing department the Staff Recommendations for Changes of Ownership, Renewals, Provisionals and Final Licenses.

1. FFD Enterprises MA, Inc.

- Commissioner Camargo moved to approve the Change of Ownership.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Change of Ownership.

2. Turning Leaf Centers Northampton.

- Commissioner Roy moved to approve the Change of Ownership.
- Commissioner Camargo seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Change of Ownership.

3. AW Funding, LLC

- Commissioner Camargo moved to approve the Change of Ownership.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes



- AC Stebbins – Yes
- The Commission unanimously approved the Change of Ownership.

4. Full Harvest Moonz, Inc.

- Commissioner Roy moved to approve the Change of Ownership.
- Commissioner Camargo seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Change of Ownership.

5. Liberty Market, LLC

- Commissioner Camargo moved to approve the Change of Ownership.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Change of Ownership.
- Commissioner Roy noted that the Commission’s Licensing tracker did not provide information on ownership and control and suggested including that information to provide more transparency.

VI. Staff Recommendations on Renewals – 02:36:28

- Commissioner Camargo moved to delegate limited authority to review and approve renewal of Licenses numbered 62, 63 and 64 on the agenda to the Director of Licensing.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the motion.
- The AC requested a condition on two Licenses: Pure Oasis LLC (#MRR207073) and Pure Oasis LLC (#MRR207074).
 - Proposed condition: Within thirty business days of approval of Application for Renewal, contact CCC Licensing Division and provide response on progress toward goals in Licensee’s Positive Impact Plan in accordance with 935 Code Mass. Regs. § 500.103(4)(b).
- Commissioner Roy moved to approve the renewal of items numbered 1-61 and 65-69 as indicated on the agenda, subject to the condition articulated by the AC.



- Commissioner Camargo seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the renewal of items numbered 1-61 and 65-69 as indicated on the agenda subject to the condition articulated by the AC.

VII. Staff Updates on Expired Conditions on License Renewals – 02:40:24

- Manager DiMare explained that this topic was before Commissioners as these Licensees had been conditionally approved for licensure but never responded to the conditions. She clarified that each condition had been placed at their renewal. Director Koval explained that Enforcement did not send out Notices of Deficiency (NODs) when conditions were not met and asked for guidance on next steps from Commissioners. The AC suggested that Commissioners work offline with Enforcement to determine next steps, and that Enforcement continue to bring expired conditions before the Commission.

VIII. Staff Recommendations on Provisional Licenses – 02:49:22

1. Topaz Enterprise, LLC (#MRN284878), Retail

- Commissioner Roy requested a condition.
 - Proposed condition: Prior to final licensure, in accordance with 935 Code Mass. Regs. § 500.140(6)(g) please include the phone number for the Massachusetts Substance Use Helpline on your consumer education.
- Commissioner Camargo moved to approve the Provisional License, subject to the condition requested by Commissioner Roy.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Provisional License, subject to the condition requested by Commissioner Roy.

2. Boston Bud Runners, LLC (#MDA1338), Delivery Operator

- Commissioner Roy requested a condition.
 - Proposed condition: In accordance with 935 Code Mass. Regs § 500.146(5)(a-j), A Delivery Operator shall make available educational materials about Finished Marijuana Products to Consumers. A Delivery Operator shall have an adequate supply of current educational material available for distribution. Prior to final licensure please provide the Commission with a copy of your consumer education.
- The AC requested a condition.



- Proposed condition: Prior to final application for licensure, provide a response to CCC Licensing Division to confirm your training and recruitment partners and eligibility to support your activities in accordance with 935 Code Mass. Regs. § 500.101(1)(c)8.k.
 - Commissioner Roy moved to approve the Provisional License, subject to the conditions requested by Commissioner Roy and the AC.
 - Commissioner Camargo seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Provisional License, subject to the conditions requested by Commissioner Roy and the AC.
 - Commissioner Roy noted that two of the Licenses up for provisional approval were making donations to the Social Equity Trust Fund as a part of their Positive Impact Plan (PIP) and asked how to make those donations. The AC stated that he had spoken with Assistant Secretary Juan Vega with the Executive Office of Economic Development (EOED) and they were working on rolling out a portal through which to make donations.
3. Green Meadows Farm, LLC (#MRN285191), Retail
- Commissioner Roy requested a condition.
 - Proposed condition: Prior to final licensure, in accordance with 935 Code Mass. Regs. § 500.140 (6)(g) please include facts regarding substance use disorder signs and symptoms, as well as referral information for substance use disorder treatment programs, and the telephone number for the Massachusetts Substance Use Helpline on your consumer education.
 - Commissioner Camargo moved to approve the Provisional License, subject to the condition requested by Commissioner Roy.
 - Commissioner Roy seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Provisional License, subject to the condition requested by Commissioner Roy.
4. Pioneer Valley Trading Company, Inc. (#MRN285301), Retail
- Commissioner Roy requested a condition.
 - Proposed condition: Prior to final licensure, in accordance with 935 Code Mass. Regs. § 500.140(6)(g) please include the phone number for the Massachusetts Substance Use Helpline on your consumer education.
 - The AC requested a condition.



- Proposed condition: Prior to final application for licensure, clarify differences in Diversity Plan Goal for hiring in accordance with 935 Code Mass. Regs. § 500.101(1)(c)8.k. and provide a response to CCC Licensing Division.
 - Commissioner Roy moved to approve the Provisional License, subject to the conditions requested by Commissioner Roy and the AC.
 - Commissioner Camargo seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Provisional License, subject to the conditions requested by Commissioner Roy and the AC.
5. Pure Framingham, Inc. (#MRN285279), Retail
- Commissioner Roy requested a condition.
 - Proposed condition: Prior to final licensure, in accordance with 935 Code Mass. Regs. § 500.140 (6)(g) please include the phone number for the Massachusetts Substance Use Helpline on your consumer education.
 - Commissioner Roy moved to approve the Provisional License, subject to the condition requested by Commissioner Roy.
 - Commissioner Camargo seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
 - The Commission unanimously approved the Provisional License, subject to the condition requested by Commissioner Roy.
 - Commissioner Roy noted that the number of Provisional Licenses up for approval had decreased and there were no Product Manufacturers or Cultivators and asked Commissioners to be mindful of licensing trends.

IX. Staff Recommendations on Final Licenses – 03:02:34

1. Cloud 9 Cannabis, LLC (#MR285037), Retail
2. Haze of Grafton, LLC (#MP282215), Product Manufacturer
3. Holyoke Wilds, LLC (#MC283571), Cultivator, Tier 2 / Indoor
4. FLXS, LLC (#MR282885), Retail
5. Mass Greenwoods LLC (#MR284644), Retail
6. Nuestra LLC (#MR283974), Retail
7. PharmaCannis Massachusetts, Inc. (#MR283794), Retail
8. UC Product Manufacturing LLC (#MP281666), Product Manufacturer
9. Yellow House Cannabis LLC (#MR284969), Retail



- Commissioner Camargo moved to approve the Final License roster from 1-9 as indicated on the agenda.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the Final License roster from 1-9 as indicated on the agenda.

X. Commission Discussion and Votes – 03:04:27

1. Legislative Review Working Group

- The AC explained that this topic was before the Commission to approve a project Charter to assess bills which had been filed in the new legislative session and bring relevant bills back before the Commission to determine policy. Commissioner Roy noted that staff were still working on implementing Chapter 180 and that new legislation could potentially create more work for staff.
- Commissioner Camargo moved to approve the legislative review working group draft Charter and recommend that the draft Charter be submitted to the incoming ED for his final approval.
- Commissioner Roy stated that this needed to move quickly and asked for an amendment to indicate that the draft Charter would be submitted to AED Hilton-Creek. There were no objections, and the AC withdrew the previous motion.
- Commissioner Camargo moved to approve the legislative review working group draft Charter and recommend that the draft Charter be submitted to AED Hilton-Creek for her final approval.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the motion.

2. Tri-Annual Review of Executive Session Minutes

- GC Chattopadhyay explained the statutory mandate to periodically review Executive Session minutes and determine whether they should continue to be withheld. He recommended withholding of two sets of minutes relating to a protective order, nine sets pertaining to litigation, two sets pertaining to strategy sessions held in preparation for negotiations with nonunion personnel and one set pertaining to a complaint against the Commission. GC Chattopadhyay recommended the release of seven sets of Executive Session minutes pertaining to litigation.



- Commissioner Camargo moved to accept the tri-annual review recommendations of the Legal department and direct the department to prepare the recommended sets of Executive Session minutes for a vote at the next regularly scheduled Public Meeting.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the motion.

3. Renewals: Tier Relegations Discussion

- Director Koval noted the Commission’s authority under 935 Code Mass. Regs. § 500.050(2)(d) and 935 Code Mass. Regs. § 501.050(2)(d) to relegate Cultivators’ tiers. She sought feedback on what factors Licensing should focus on when considering relegation. Commissioner Roy asked for information on how other jurisdictions were handling this issue and Director Koval explained that her staff was currently researching that. Chief Jones explained that there had been Licensees who had requested a tier relegation, but this matter differed in that it was not voluntary. Director Koval presented Licensing data on Cultivators which showed the total canopy and Commissioner Camargo suggested that Commissioners work offline to develop their positions on the topic. Commissioner Roy requested information on the number of Cultivators which were currently active, the numbers which were active by year and whether they were indoor or outdoor. Commissioner Camargo asked Commissioner Roy if she would sponsor this topic, and she confirmed that she could. Chief Jones reiterated that Commissioners needed to develop criteria for determining what factors should prompt tier relegation so that staff and Licensees would be on notice. The AC requested information on how other jurisdictions had handled this topic and requested a recommendation at a future meeting after Licensing had worked with Commissioners offline.

4. Administrative License Renewal Extension Discussion

- Director Koval stated that there were Licensees who had exhausted the administrative extensions which were approved at the May 23, 2024, Public Meeting. She sought to allow for further extensions to total 600 calendar days. Chief Jones explained that this would provide staff with enough time to review HCAs as well as for Licensees to obtain compliant HCAs. GC Chattopadhyay noted that this extension would be for the sole purpose of allowing Licensees to obtain compliant HCAs. Commissioner Roy asked if a motion made on August 11, 2022, needed to be rescinded and Chief Jones confirmed that it did not as it allowed Licensees to seek administrative extensions for matters other than obtaining compliant HCAs. Commissioners reviewed proposed motion language and GC Chattopadhyay confirmed that Commissioners could vote to amend the language after the onboarding of the new ED if he preferred that authority to approve extensions be delegated to him.



- Commissioner Camargo made a motion, in furtherance of previous motions, regarding extensions for Licensees voted on at the Public Meetings on August 11, 2022, and May 23, 2024, the Commission now moves to grant a further limited delegation of its authority under G.L. c. 10, § 76 (j) and G.L. c. 94G, § 6 (a) to permit the Chief of Investigations and Enforcement or their delegee discretion to approve additional extensions not to exceed an additional 240 calendar days in total for the exclusive purpose of HCA or HCA Waiver compliance provided however, any administrative extension granted to a Licensee by this delegation of authority and the prior delegations of authority granted on August 11, 2022, and May 23, 2024 shall not exceed 600 calendar days in total and provided further that during an administrative extension Licensees shall continue to comply with the Commission’s requirements for licensure and shall be required to pay a prorated License fee to cover the extension.
- Commissioner Roy asked if G.L. c. 94I needed to be included in the motion language and asked if that was a problem that the statute was not identified in previous motions.
- The Commission took a brief recess. (Returned at 04:20:03.)
- GC Chattopadhyay stated that G.L. c. 94I did not have a section which mirrored G.L. c. 94G, § 6 (a), but that Commissioners could cite G.L. c. 94I, § 7 for the purpose of completeness. Director Koval confirmed that administrative extension had been granted to MTCs. Commissioner Camargo withdrew her previous motion.
- Commissioner Camargo made a motion, in furtherance of previous motions, regarding extensions for Licensees voted on at the Public Meetings on August 11, 2022, and May 23, 2024, the Commission now moves to grant a further limited delegation of its authority under G.L. c. 10, § 76 (j), G.L. c. 94G, § 6 (a) and G.L. c. 94I, § 7 to permit the Chief of Investigations and Enforcement or their delegee discretion to approve additional extensions not to exceed an additional 240 calendar days in total for the exclusive purpose of HCA or HCA Waiver compliance provided however, any administrative extension granted to a Licensee by this delegation of authority and the prior delegations of authority granted on August 11, 2022, and May 23, 2024 shall not exceed 600 calendar days in total and provided further that during an administrative extension Licensee shall continue to comply with the Commission’s requirements for licensure and shall be required to pay a prorated License fee to cover the extension.
- The Commission took a brief recess as Commissioner Roy was experiencing technical issues. (Returned at 04:37:26.)
- The AC took a roll call vote on the motion made by Commissioner Camargo:
 - Commissioner Roy – Yes
 - AC Stebbins – Yes

XI. New Business Not Anticipated at the Time of Posting – 04:37:53

- The AC stated that there was no new business which was not anticipated at the time of posting.



XII. Next Meeting Date – 04:38:04

- The AC stated that the next meeting was scheduled for February 18, 2025, solely to enter Executive Session. AED Hilton-Creek noted that she had received inquiries regarding a comment that Commissioner Camargo had made about Commission employees being concerned about their jobs and Commissioner Camargo clarified that she had intended to reassure staff that no layoffs or terminations were being considered.

XIII. Adjournment – 04:42:50

- Commissioner Camargo moved to adjourn.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the motion to adjourn.



CANNABIS CONTROL COMMISSION

February 18, 2025
2:00 PM

Remote via [Microsoft Teams Live*](#)

PUBLIC MEETING MINUTES

Documents:

- N/A

In Attendance:

- Commissioner Nurys Z. Camargo
- Commissioner Kimberly Roy
- Acting Chair Bruce Stebbins

Minutes:

1) Call to Order

- The Acting Chair (AC) recognized a quorum and called the meeting to order.
- The AC gave notice that the meeting is being recorded.
- The AC gave an overview of the agenda.

2) Executive Session – 00:00:37

- Commissioner Camargo moved to enter into Executive Session pursuant to G. L. c. 30A, § 21(a)(3) to discuss strategy with respect to collective bargaining or litigation because the open meeting may have a detrimental effect on the bargaining or litigating position of the public body.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - AC Stebbins – Yes
- The Commission unanimously approved the motion to enter into Executive Session and each Commissioner confirmed that they were alone and that no one could hear the deliberations of the Executive Session.
- The AC stated that the Commission would adjourn from Executive Session.



MARIJUANA ESTABLISHMENT RENEWALS
EXECUTIVE SUMMARY
COMMISSION MEETING: MARCH 13, 2025

RENEWAL OVERVIEW

1. Name, license number, renewal application number, host community, and funds deriving from a Host Community Agreement allocated for the municipality for each Marijuana Establishment presented for renewal:

	Licensee Name	License Number	Renewal Application Number	Location
1	ARL Healthcare Inc.	MR282334	MRR207015	Beverly
2	Ashli's Extracts, Inc.	MP281374	MPR244243	Attleboro
3	Ashli's Farm, Inc.	MC281451	MCR140818	Attleboro
4	Ashli's, Inc.	MR281332	MRR207027	Attleboro
5	Baked Beans Farm LLC	MP282045	MPR244189	Beverly
6	Beacon Compassion, Inc.	MR284569	MRR207219	Boston
7	Berkshire Roots, Inc.	MX281322	MXR126678	Pittsfield
8	Berkshire Roots, Inc.	MC281590	MCR140901	Pittsfield
9	Berkshire Roots, Inc.	MP281427	MPR244314	Pittsfield
10	Buudda Brothers LLC	MC281939	MCR140750	Holyoke
11	Buudda Brothers LLC	MP281585	MPR244194	Holyoke
12	CannaVanna, Inc.	MR282801	MRR207148	Rockland
13	CommCan, Inc	MR283001	MRR206877	Rehoboth
14	Coyote Cannabis Corporation	MC283657	MCR140913	Uxbridge
15	Coyote Cannabis Corporation	MP282152	MPR244316	Uxbridge
16	Elevated Roots II LLC	MR284547	MRR206913	Halifax
17	Elevated Roots, LLC	MR283092	MRR206907	Kingston
18	ELEVATION RETAIL II LLC	MR283887	MRR207116	Fairhaven
19	FFD Enterprises MA	MR281571	MRR206977	Rowley
20	Gan Or LLC	MD1292	MDR272573	Northampton
21	Gan Or LLC	MP282097	MPR244211	Northampton
22	Gas Bus LLC	MD1320	MDR272579	Middleborough



23	Green Era LLC	MR282902	MRR207080	Mendon
24	Greenjeans Farms, LLC	CO281706	COR129715	Whately/Belchertown
25	GTE Taunton LLC	MR282958	MRR207191	Taunton
26	Holistic Health Group Inc.	MR283126	MRR207004	Middleborough
27	Holistic Industries, Inc.	MR281787	MRR207213	Somerville
28	JMK Gardening, LLC DBA Wonderland-Cannabis Co	MR284654	MRR207161	Millbury
29	Leaf Lux Group Inc.	MR284051	MRR207082	Holyoke
30	New Dia, LLC	MR281269	MRR207136	Worcester
31	Pudding Hill Farm LLC	MC283501	MCR140863	Blandford
32	Resinate, Inc.	MR282398	MRR207151	Northampton
33	Rooted In, LLC	MR284261	MRR207206	Boston
34	Sanctuary Medicinals, Inc.	MP281405	MPR244300	Littleton
35	Slang, Inc.	MR281402	MRR207147	Pittsfield
36	Solar Therapeutics, Inc.	MR282731	MRR206955	Dartmouth
37	Sweetgrass Botanicals Extractions LLC	MP282058	MPR244207	Lee
38	Sweetgrass Botanicals LLC	MR284185	MRR206965	Lee
39	T. Bear Inc.	MP281314	MPR244277	Wareham
40	The Heirloom Collective, Inc.	MR284511	MRR207214	North Easton
41	True East Leaf LLC	MC282313	MCR140756	Pittsfield
42	True East Leaf LLC	MR282909	MRR206950	Pittsfield
43	Western Front, LLC	MR281907	MRR207125	Chelsea

2. All licensees have submitted renewal applications pursuant to 935 CMR 500.103(4) which include the licensee's disclosure of their progress or success towards their Positive Impact and Diversity Plans.
3. All licensees have submitted documentation of good standing from the Secretary of the Commonwealth, Department of Revenue, and Department of Unemployment Assistance, if applicable.
4. All licensees provided a compliant HCA or HCA Waiver, that was accepted by Commission staff pursuant to 935 CMR 500.180(3).
5. All licensees have paid the appropriate annual license fee.
6. The licensees, when applicable, have been inspected during the current renewal period.
7. Commission staff certify that, to the best of our knowledge, no information has been found that would prevent renewal of the licenses mentioned above pursuant to 935 CMR 500.450.



RECOMMENDATION

Commission staff recommend review and decision on the above-mentioned licenses applying for renewal, and if approved, request that the approval be subject to the licensee remaining in compliance with the Commission regulations and applicable law.



**MEDICAL MARIJUANA TREATMENT CENTER RENEWALS
EXECUTIVE SUMMARY
COMMISSION MEETING: MARCH 13, 2025**

RENEWAL OVERVIEW

1. Name, license number, host community, for each Medical Marijuana Treatment Center presented for renewal:

	Licensee Name	License Number	Host Community (Cultivation)	Host Community (Dispensing)
44	Alternative Compassion Services, Inc.	RMD3320	Bridgewater	Hull
45	Green Gold Group, Inc.	RMD786	North Brookfield	Charlton

2. All licensees have submitted renewal applications pursuant to 935 CMR 501.100(5).
3. All licensees have paid the appropriate annual license fee.
4. All licensees provided a compliant HCA or HCA Waiver, that was accepted by Commission staff pursuant to 935 CMR 500.180(3).
5. The licensees, when applicable, have been inspected during the current renewal period.
6. Commission staff certify that, to the best of our knowledge, no information has been found that would prevent renewal of the licenses mentioned above pursuant to 935 CMR 501.405.

RECOMMENDATION

Commission staff recommend review and decision on the above-mentioned licenses applying for renewal, and if approved, request that the approval be subject to the licensee remaining in compliance with the Commission regulations and applicable law.



Ember Gardens Boston, LLC

MRN284206

APPLICATION OF INTENT REVIEW

1. Name, address, and license type(s) sought of the proposed License Applicant:

License Applicant Business Name:	Ember Gardens Boston, LLC
Proposed Location:	297 Newbury Street, Boston, MA 02115

2. Type of final license sought (if cultivation, its tier level and outside/inside operation):

License Type(s) Sought:
Marijuana Retailer

3. The license applicant is associated with the following license type(s):

The license applicant is not associated with any other license applications or licenses.

4. List of all required individuals and their roles:

Individual	Role
Joseph Hoffman	Person Having Direct/Indirect Control / Capital Contributor
Daniel Gillan	Person Having Direct/Indirect Control
Shane Hyde	Person Having Direct/Indirect Control
George Friedlander	Person Having Direct/Indirect Control

5. List of all required entities and their roles:

Entity	Role
Ember Gardens Holdings, LLC	Entity Having Direct/Indirect Control / Capital Contributor

6. License Applicant's Status:

Expedited Applicant (Social Equity Program Participant)
Joseph Hoffman / 51% / SE305345)



7. The license applicant and host community executed a Host Community Agreement (“HCA”) on October 7, 2024. The license applicant submitted or resubmitted their application on or after March 1, 2024 and provided a compliant HCA that was certified by Commission staff pursuant to 935 CMR 500.180(3) and/or comparable medical regulations.
8. The Commission received a municipal response from the host community on January 7, 2025 stating the applicant was in compliance with all local ordinances or by-laws.
9. The license applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	The license applicant proposes to provide scholarship funds opportunities for 4 students (21+) from areas of disproportionate impact in MA, specifically census tracts of Boston.
2	The license applicant proposed to provide internship/training opportunities for 4 students (21+) from areas of disproportionate impact in MA, specifically census tracts of Boston.

BACKGROUND CHECK REVIEW

10. There were disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions. None of the disclosures raised suitability issues.
11. There were no concerns arising from background checks on the individuals or entities associated with the application.

MANAGEMENT AND OPERATIONS PROFILE REVIEW

12. The license applicant submitted all required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission’s regulations.
13. The license applicant proposed the following goals for its Diversity Plan:

#	Goal
1	The license applicant proposes to hire the following: 25% Women, 25% People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, 5% Veterans, 5% Persons with Disabilities, and 5% LGBTQ+ People.
2	The license applicant proposes to contract with suppliers, vendors, and service providers who are 20% Woman, People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, Veterans, Persons with Disabilities and LGBTQ+ owned.



PROVISIONAL LICENSE CONDITIONS

Commission staff has reviewed the application for compliance with applicable laws and regulations and are presenting it for the Commission's review and vote.

1. Provisional licensure is subject to the payment of the appropriate license fee within 90 days of an affirmative vote of the Commission pursuant to 935 CMR 500.103(1)(e) and 935 CMR 501.103(1)(d)
2. Provisional licensure does not allow the license holder to cultivate, manufacture, or possess marijuana and/or marijuana infused products (MIPs) prior to being approved for a final license.



Haze of Grafton, LLC

MR282399

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Haze of Grafton, LLC
Licensee d/b/a Name:	Simplicity Dispensary
Licensed Location:	135 Westboro Road, Grafton, MA 01536

2. Type of final license sought (if cultivation, its tier level and outside/inside operation):

License Type(s) Sought:
Marijuana Retailer

3. The licensee is associated with the following license type(s):

Type	Status	Location
Marijuana Product Manufacturing	Final License	Grafton

The licensee is not associated with any other license applications or licenses.

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on June 4, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

INSPECTION OVERVIEW

Final License Executive Summary 1



8. Commission staff inspected the licensee’s facility on the following date(s): February 6, 2025.
9. The licensee’s facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the licensee was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff’s inspection is highlighted below:

a. Security

Enforcement staff verified that all security-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. The security of all entrances and exits;
- ii. Visitor procedures;
- iii. Limited access areas;
- iv. Verification of a primary and back-up security company;
- v. Presence of perimeter and duress alarms; and
- vi. All cameras complied with Commission requirements.

b. Inventory and Storage

Enforcement staff verified that all inventory-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Secure storage of marijuana and marijuana products;
- ii. Sanitation and pest control measures; and
- iii. Inventory controls and procedures.

c. Cultivation Operation

Not applicable.

d. Product Manufacturing Operation

Not applicable.

e. Retail Operation



Enforcement staff verified that all retail-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Verification of identifications for access;
- ii. Layout of the sales floor; and
- iii. Availability and contents of adult-use consumer education materials.

f. Transportation

The licensee will not be performing transportation activities at this time.

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

1. The licensee may possess and otherwise acquire marijuana, but shall not dispense, sell, or otherwise transport marijuana to other Marijuana Establishments, or to consumers, until upon inspection, receiving permission from the Commission to commence full operations.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations.
3. The licensee remains suitable for licensure.
4. The licensee shall cooperate with and provide information to Commission staff.
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

The licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Therefore, the licensee is recommended for final licensure.

As part of the approval of final licensure, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.



Lazy River Products-Tewksbury, LLC

MR284805

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Lazy River Products-Tewksbury, LLC
Licensed Location:	553 Main Street, Unit 2, Tewksbury, MA 01876

2. Type of final license sought (if cultivation, its tier level and outside/inside operation):

License Type(s) Sought:
Marijuana Retailer

3. The licensee is associated with the following license type(s):

The licensee is not associated with any other license applications or licenses.

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on December 12, 2024.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): February 5, 2025.



9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the licensee was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

Enforcement staff verified that all security-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. The security of all entrances and exits;
- ii. Visitor procedures;
- iii. Limited access areas;
- iv. Verification of a primary and back-up security company;
- v. Presence of perimeter and duress alarms; and
- vi. All cameras complied with Commission requirements.

- b. Inventory and Storage

Enforcement staff verified that all inventory-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Secure storage of marijuana and marijuana products;
- ii. Sanitation and pest control measures; and
- iii. Inventory controls and procedures.

- c. Cultivation Operation

Not applicable.

- d. Product Manufacturing Operation

Not applicable.

- e. Retail Operation

Enforcement staff verified that all retail-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Verification of identifications for access;
- ii. Layout of the sales floor; and
- iii. Availability and contents of adult-use consumer education materials.



f. Transportation

The licensee will not be performing transportation activities at this time.

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

1. The licensee may possess and otherwise acquire marijuana, but shall not dispense, sell, or otherwise transport marijuana to other Marijuana Establishments, or to consumers, until upon inspection, receiving permission from the Commission to commence full operations.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations.
3. The licensee remains suitable for licensure.
4. The licensee shall cooperate with and provide information to Commission staff.
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

The licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Therefore, the licensee is recommended for final licensure.

As part of the approval of final licensure, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.



Richards Flowers, LLC

MB282225

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Richards Flowers, LLC
Licensed Location:	296 Irving Street, Framingham, MA 01702

2. Type of final license sought (if cultivation, its tier level and outside/inside operation):

License Type(s) Sought:
Marijuana Microbusiness (Cultivation and Product Manufacturing)

3. The licensee is associated with the following license type(s):

The licensee is not associated with any other license applications or licenses.

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on June 17, 2021.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): January 8, 2025.



9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the licensee was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

Enforcement staff verified that all security-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. The security of all entrances and exits;
- ii. Visitor procedures;
- iii. Limited access areas;
- iv. Verification of a primary and back-up security company;
- v. Presence of perimeter and duress alarms; and
- vi. All cameras complied with Commission requirements.

- b. Inventory and Storage

Enforcement staff verified that all inventory-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Secure storage of marijuana and marijuana products;
- ii. Sanitation and pest control measures; and
- iii. Inventory controls and procedures.

- c. Cultivation Operation

Enforcement staff verified that all cultivation operations were in compliance with the Commission's regulations. Some of the requirements verified include the following:

- i. Seed-to-sale tracking;
- ii. Compliance with applicable pesticide laws and regulations; and
- iii. Best practices to limit contamination.

- d. Product Manufacturing Operation

Enforcement staff verified that all manufacturing-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Proposed product compliance; and
- ii. Safety, sanitation, and security of the area and products.



e. Retail Operation

Not applicable.

f. Transportation

The licensee will not be performing transportation activities at this time.

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

1. The licensee may cultivate, harvest, possess, prepare, produce, and otherwise acquire marijuana, but shall not sell, or otherwise transport marijuana to other Marijuana Establishments, until upon inspection, receiving permission from the Commission to commence full operations.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations.
3. The licensee remains suitable for licensure.
4. The licensee shall cooperate with and provide information to Commission staff.
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

The licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Therefore, the licensee is recommended for final licensure.

As part of the approval of final licensure, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.



Green Gold Group, Inc.
RMD4217-R

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Green Gold Group, Inc.
Licensed Cultivation Location:	The licensee's cultivation operations commenced operations previously under another MTC license
Licensed Manufacturing Location:	The licensee's product manufacturing operations commenced operations previously under another MTC license
Licensed Dispensary Location:	1140 Thorndike Street, Palmer, MA 01069

2. Type of final license sought (if cultivation, its tier level and outside/inside operation):

License Type(s) Sought:
Medical Marijuana Treatment Center

3. The licensee is associated with the following license type(s):

Type	Status	Location
Marijuana Retail	Commence Operations	Palmer
Marijuana Retail	Commence Operations	Charlton
Marijuana Product Manufacturing	Final License	North Brookfield
Marijuana Retail	Commence Operations	Marlborough
Marijuana Cultivation, Tier 1/Indoor (up to 5,000 sq. ft.)	Final License	North Brookfield
MTC	Commence Operations	Brookfield-Palmer
MTC	Commence Operations	NorthBrookfield-Charlton

LICENSING OVERVIEW



4. The licensee was approved for provisional licensure for the above-mentioned license(s) on December 12, 2024.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): January 28, 2025.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the licensee was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

Enforcement staff verified that all security-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. The security of all entrances and exits;
- ii. Visitor procedures;
- iii. Limited access areas;
- iv. Verification of a primary and back-up security company;
- v. Presence of perimeter and duress alarms; and
- vi. All cameras complied with Commission requirements.

- b. Inventory and Storage

Enforcement staff verified that all inventory-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Secure storage of marijuana and marijuana products;
- ii. Sanitation and pest control measures; and
- iii. Inventory controls and procedures.



c. Cultivation Operation

Not applicable.

d. Product Manufacturing Operation

Not applicable.

e. Retail Operation

Enforcement staff verified that all retail-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Verification of identifications for access;
- ii. Layout of the sales floor; and
- iii. Availability and contents of adult-use consumer education materials.

f. Transportation

Enforcement staff verified that all transportation-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Vehicle and staffing requirements;
- ii. Communication and reporting requirements; and
- iii. Inventory and manifests requirements.

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

1. The licensee may possess and otherwise acquire marijuana, but shall not dispense, sell, or otherwise transport marijuana to other Marijuana Establishments, or to consumers, until upon inspection, receiving permission from the Commission to commence full operations.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations.
3. The licensee remains suitable for licensure.
4. The licensee shall cooperate with and provide information to Commission staff.
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

The licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Therefore, the licensee is recommended for final licensure.



As part of the approval of final licensure, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.



420 Trainers LLC
RVR453152

RESPONSIBLE VENDOR TRAINING (“RVT”) TRAINER RENEWAL SUMMARY

1. Name, address, and contact information of the RVT trainer:

Item	Information
RVT Trainer Name	420 Trainers LLC
RVT Certification Number	RV453790
RVT Trainer d/b/a Name	N/A
RVT Address	2 Riverbend Drive, Plattsburgh NY 12901
RVT Business Phone Number	(508) 878-4172
RVT Business Email Address	contact@420trainers.com
RVT Business Website	https://www.420trainers.com/

2. The RVT trainer has submitted a renewal application to continue to provide a training program for the Basic Core Curriculum.
3. No owner, manager, or employee of the RVT trainer is a Person or Entity Having Direct or Indirect Control of a Marijuana Establishment or Medical Marijuana Treatment Center. The following is a list of all required individuals disclosed:

Individual	Role
Danielle Howard-Ross	Owner
Robert Jarrad	Controlling Person /Employee

OVERVIEW OF TRAINING PROGRAM

4. The RVT trainer was originally certified on May 14, 2021. Since that time, or the time of its last renewal, the RVT trainer has provided instruction to 2,578 Marijuana Establishment and Medical Marijuana Treatment Center agents.
5. The RVT trainer’s program is presented in both in-person and virtual model.
6. The RVT trainer has continued to demonstrate the following:



- a. Verify the identification and certify completion of the RVT program for each agent;
- b. Track trainees' time needed to complete the course training;
- c. Allow the trainees to ask questions of the RVT trainer; and
- d. To evaluate each trainee's proficiency with course material.

RECOMMENDATION

Commission staff recommends the RVT trainer listed above be approved for renewal for a two-year certification to provide its training program with the following conditions:

1. The RVT trainer shall ensure all training materials reflect current Commission regulations.
2. The RVT trainer shall remain fully compliant with all applicable Commission regulations.

This recommendation is based on the review and evaluations of required materials and information submitted to the Commission.



Memorandum

To: Commissioners
Cc: Travis Ahern, Executive Director
From: Matt Giancola, Director of Government Affairs and Policy
Date: March 13, 2025
Subject: **March 2025 Government Affairs Update**

Legislative Update

Acting Chair Bruce Stebbins, Acting Executive Director Debra Hilton-Creek, and Government Affairs and Policy staff met with Rep. Michael Day to discuss the Commission's FY 2026 budget request and share general updates on the ongoing work of the agency.

Commissioner Kimberly Roy, Acting Executive Director Debra Hilton-Creek and Commission staff met with Rep. Daniel Donahue to discuss the Commission's FY 2026 budget request and shared updates and perspectives regarding the ongoing work of the agency.

Acting Chair Stebbins met with the Massachusetts Major Cities Chiefs Association to discuss social consumption and public safety concerns related to this license type.

Municipal Update

Municipal Law Unit

The Attorney General's Municipal Law Unit (MLU) issued [one marijuana related decision](#) this past month:

Town of Windsor: The MLU approved in part and disapproved in part the Town's amended zoning by-laws. The MLU disapproved a section prohibiting Medical Marijuana Treatment Centers as it would frustrate the purpose of state law to allow patients to have reasonable access to medical marijuana. The MLU approved a prohibition on all types of Marijuana Establishments within the town.



CANNABIS CONTROL COMMISSION

December 11, 2024
1:00 PM

Remote via [Zoom](#)

PUBLIC HEARING MINUTES

Documents:

- N/A

In Attendance:

- Director of Equity and Community Outreach Silea Williams

Minutes:

1) Public Listening Session on Delivery License Exclusivity Period

- I. Understanding the Delivery License Exclusivity Period
 - Director of Equity and Community Outreach Silea Williams (Director Williams) explained that Delivery Licenses were only available to Social Equity Program (SEP) participants, Certified Economic Empowerment Priority applicants (EEAs) and Pre-Verified and Verified Social Equity Businesses (SEBs) from April 1, 2022, to April 1, 2025.
- II. Purpose and Goal
 - Director Williams explained that the purpose of the day's listening session was to hear from constituents regarding whether or not the exclusivity period should be extended.
- III. Rules of Conduct
 - Director Williams provided an overview of the rules of conduct and asked participants to keep their testimony respectful and under three minutes.
- IV. Live Testimony
 - The first speaker was David O'Brien, President of the Cannabis Business Association. Mr. O'Brien said that his organization included many Delivery Licensees and advocated for extending the exclusivity period by three years.



- The next speaker was Grant Smith Ellis who concurred with Mr. O'Brien. He described the history of the Delivery License type and how it had changed since inception. He said that the Commission's licensing data would clearly show that the goals of the exclusivity period had not been met and asked for it to be extended by three to four years.
- The next speaker was Lucas Thayer, owner of Apple Guy Flowers. He said that he had been an SEP participant since 2020. He advocated for extending the exclusivity period for ten years because of the time it took for Licensees to become operational. He advocated for a 15-year exclusivity period for the Social Consumption License type. He explained that for much of the Delivery Licenses exclusivity period, the License type had not been profitable, and current Licensees had not been able to benefit from the newest round of regulatory amendments.
- The next speaker was Devin Alexander. He said that he was a graduate of the first cohort of the SEP and was the owner of Rolling Releaf. He agreed with the previous speaker and said that it would be detrimental to end the exclusivity period on April 1, 2025. He advocated for it to be extended indefinitely or, at a minimum, for five years.
- The next speaker was Duane Edward Osborn, owner of Green Flash Delivery. He said that he had graduated from the SEP's second cohort. He described the difficult process of obtaining capital to start his business and advocated for extending the exclusivity period by sixty months. He described the financial difficulty of operating in the Cannabis industry.
- The next speaker was Pedro Tavares, CEO of On Route, LLC. He stated that the elimination of the two-driver rule was what made this License type profitable and at a bare minimum the exclusivity period should be restarted on April 1, 2025, so that Licensees could benefit from the new regulations. He explained that if the exclusivity period ended, current Licensees would not be able to compete with larger more established entities which would enter the market.
- The next speaker was Steven DeMarco, CEO of Wonderland Dispensary. He stated that black and brown people faced discrimination when entering the marketplace and advocated for extending the exclusivity period for as long as possible. He explained that the Commission was overlooking the issue of disabled people living in no-towns which did not allow delivery in their borders and advocated for the Commission to force towns to allow delivery. He added that increasing purchase limits would make the Delivery Licenses more profitable.
- The next speaker was Michael Marinaro, CEO of BadaBloom. He advocated for extending the exclusivity period. He stated that he was not yet operational, and he had gathered millions to run his business. He asked for a 10-year exclusivity period so that current and new Licensees could benefit from new regulations which allowed for operators to use a single driver.
- The next speaker was Kevin Gilnack policy co-Chair of Equitable Opportunities Now. He described the costs that delivery operators faced and said that the goal of the exclusivity period had not been met and advocated for extending it by five years. He said that the regulations should be changed so that in the future, it would be extended



automatically and not brought before the Commission for a vote until the goals had been met.

- The next speaker was Gabe Viera. He advocated for extending the exclusivity period by five years.
- The next speaker was Ruben Seyde, owner of Delivered Inc. and SEP graduate. He said that the data was clear that the goals of the exclusivity period had not been met and delivery operators had not been successful. He asked for the exclusivity period to be extended for five years. He added that purchase limits should be increased.
- The next speaker was Chris Fevry, founder of Your Green Package. He said that he was the oldest operating courier and advocated for extending the exclusivity period by five years. He stated that the two-driver rule had kept Licensees from being profitable and as it had just been reduced, Licensees had not been able to benefit from the new regulations.
- The next speaker was Cleon Byron. He said that he was a part of the first cohort of the SEP and asked for the exclusivity period to be extended for five years.
- The next speaker was David Rabinovitz. He advocated for extending the exclusivity period. He explained that if it was allowed to expire, larger entities would enter the market and the current Licensees, who had not been profitable, would not be able to compete.
- The next speaker was Edson Charles. He said that there is still a lot of work that needed to happen to create an equitable marketplace. He said that he had started his journey in 2018 and had not opened his doors until 2023. He stated that this was an unusual industry because people needed the capital to entirely stand up a business before opening the doors. He said the Commission should consider increasing purchase limits and dedicating more resources to SEP participants.
- The next speaker was Ryan Cohen of Kind Run Delivery. He said that he was the longest running business-to-consumer operator and had been in operation for three years. He said that it had been difficult and delivery operators had not been able to benefit from the reduction of the two-driver rule. He asked for the exclusivity period to be extended by three or more years.
- The next speaker was former Commissioner Shaleen Title. She noted that other speakers had referenced arbitrary numbers for extending the exclusivity period and cautioned that the regulations already provided a process for extending the exclusivity period, which should be followed. She explained that setting arbitrary standards for exclusivity would invite litigation.
- The next speaker was Dan Berger of Grassp Ventures. He said that he supported extending the exclusivity period and said it would help his business.

V. Next steps

- Director Williams stated that the last day to give written testimony was December 13, 2024, at 5:00 p.m. She thanked participants for their time and closed the public listening session.



Cannabis Control Commission
Job Description

Department: Information Technology

Reports to: Director of Data and Analytics

Job Title: Data Analyst

FLSA Status: Exempt

I. PURPOSE OF THE JOB

The Data Analyst/Project Coordinator, reporting to the Director of Data and Analytics, will be responsible for supporting data-driven projects across the organization. This includes managing data-related projects, performing data retrieval, data analysis, and ensuring accurate and timely completion of all data initiatives.

II. ESSENTIAL FUNCTIONS AND RESPONSIBILITIES

- Support the Director of Data and Analytics in executing data initiatives aligned with organizational goals.
- Assist in the planning, implementation, and tracking of data strategies, including data acquisition and vendor management.
- Coordinate and oversee data projects, ensuring deliverables meet standards and timelines.
- Process, clean, and integrate large datasets from various sources to support organizational objectives.
- Develop data collection tools, databases, and detailed documentation with a focus on data integrity and systems integration.
- Produce and present data findings independently and as part of a team.
- Assist departments and external stakeholders in incorporating data strategies and data-driven decisions in their projects and initiatives.
- Collaborate with team members, departments, and external stakeholders to interpret and communicate data insights.

III. OTHER DUTIES AND RESPONSIBILITIES

- Maintain high standards of professional and ethical conduct, supporting a diverse and inclusive workplace.
- Provide data insights and briefings on relevant topics as requested by the Executive Director or Commissioners.
- Contribute to discussions by offering data and analysis relevant to policy and strategic decisions.
- Perform related duties as assigned.

IV. KNOWLEDGE AND SKILLS

- Strong quantitative analysis skills.
- Proficiency in at least one advanced quantitative analysis software (e.g., Tableau, Excel).
- Experience with database development, data querying, and statistical analysis.
- Skilled in identifying metrics and performing advanced analytics techniques.

- Familiarity with project management methodologies, especially Lean and Agile.
- Clear, concise presentation of complex information.
- Critical thinking and strategic problem-solving skills.
- Ability to work independently and as part of a collaborative team.
- Excellent project management and communication skills.
- Ability to work in a fast-paced, data-centric environment.
- Familiarity with the organization's mission and regulatory standards.
- Willingness to learn and engage in new data topics.
- Experience in documenting and creating data catalogs/userguides.

V. EDUCATION AND EXPERIENCE

- Degree in Public Policy, Business, Health Sciences, Economics, Statistics, Computer Science, or a related field from an accredited institution. Focused analytics experience may substitute for formal education.
- Minimum of 3-5 years of experience in quantitative data analysis, public policy, health sciences, economics, or related fields.
- Experience working with large, varied datasets.
- Knowledge of the cannabis regulatory environment and/or data-driven operations.
- Experience working with individuals from diverse cultural and ethnic backgrounds.

VI. KEY COMPETENCIES

- **Data Wrangling:** Demonstrated ability to synthesize big data sets from multiple sources.
- **Attention to Detail:** Ability to work with precision and ensure data accuracy.
- **Project Management:** Skilled in organizing tasks, managing timelines, and balancing multiple priorities.
- **Collaboration:** Demonstrates teamwork and effective communication with stakeholders at all levels.
- **Adaptability:** Ability to adjust to shifting priorities and rapidly changing environments.
- **Technical Problem Solving:** Capability to troubleshoot data issues and implement effective solutions.

VII. TECHNICAL REQUIREMENTS

- Proficiency with advanced data analysis tools and software, such as SQL, Python, R, Tableau, or Excel.
- Familiarity with automated solutions (e.g., Power Platform) a strong plus.
- Familiarity with cloud storage and data management tools (e.g., Azure, Power Platform, AWS, Google Cloud Platform) is a plus.
- Experience with data visualization software to create clear and actionable insights.
- Knowledge of project management software (e.g., Jira, Asana, Microsoft Project) is desirable.

VIII. WORK ENVIRONMENT

- Position is based at the Commission's headquarters in Worcester.
- Hybrid work arrangements may be considered, subject to organizational needs and approval.
- Occasional travel may be required for meetings or data-gathering initiatives.

IX. SALARY RANGE

\$70,000 - \$80,000

Benefits Package:

The Commission is pleased to offer a comprehensive benefits package to its employees. The specific components and eligibility may vary based upon position classification, hours worked per week and other variables. Therefore, specific benefits for this position may be discussed as part of the interview and offer process.

This position is non-civil service. This position is an exempt position.

The overall benefits available include: paid vacation, sick and personal leave time, health, dental and vision insurance through the Commonwealth's Group Insurance, and optional pre-tax Health Savings Account plans.

In addition, the Commission provides employees the opportunity to elect life insurance, long term disability insurance, deferred compensation savings, tuition remission and pre-tax commuter account plans, along with other programs.

The Commission employees also participate in the Commonwealth's State Retirement Plan, which can become a defined benefit plan for those that both vest and subsequently retire from State service. Follow this link for additional retirement information:

<http://www.mass.gov/treasury/retirement/state-board-of-retire/>.

Commitment to Diversity:

The Commission is committed to building a diverse staff across its entire agency and at all levels. The Commission is an equal opportunity/affirmative action employer.

Application Process and Deadline:

The Commission encourages interested candidates that meet the minimum requirements for experience and skills to apply for this position. Interested candidates should submit a cover letter and resume by email no later than _____. The application package should be submitted to:

Careers@cccmass.com

Please include the position title in the subject line: CCC – Data Analyst

Submissions are due by _____ late submissions may be considered solely at the discretion of the Commission.

Notice of Required Background Check – Including Tax Compliance:

The Commission requires a background check on all prospective employees as a condition of employment.

Candidates should be aware of this requirement but should also know that such background check is not initiated until:

1. A candidate is invited to a second or subsequent interview, and
2. The candidate has signed the Background Check Authorization Form and related releases.

This background check includes a Criminal Offender Record Information (CORI) check, Federal IRS and Department of Revenue state tax compliance on all prospective employees as a condition of their employment.

Candidates with advanced degrees and professional licenses may have these credentials verified. Individuals other than those references provided by a candidate may be contacted in the course of completing a full background and qualification check.

Those candidates invited to interview will be contacted by the Commission. Unfortunately, due to the anticipated high volume of applicants for this vacancy, we are unable to provide status updates to specific individuals.

Administrative Order

Requiring Licensees to Submit Full Panel Test Sample for Required Compliance Testing

G.L. c. 94G, G.L. c. 94I

935 Code Mass. Regs. §§ 500.105, 500.120, 500.130, 500.140, 500.141, 500.146, 500.147, 500.200, 500.160 and

935 Code Mass. Regs. §§ 501.105, 501.120, 501.130, 501.140, 501.141, 501.146, 501.147, 501.200, 500.160

The Cannabis Control Commission, acting through its Acting Executive Director, issues this Administrative Order No. 4 (Administrative Order) to ensure proper testing of Marijuana and Marijuana Products sold or otherwise marketed to Patients and Consumers consistent with its statutory mandate under G.L. c. 94G and G.L. c. 94I, and applicable adult- and medical-use regulations, 935 Code Mass. Regs. (CMR) §§ 500.000 and 501.000.

In compliance with this Administrative Order, licensed Marijuana Establishments and Medical Marijuana Treatment Centers (MTCs) (collectively, "Licensees"), shall submit one (1) Test Sample Package to a single Independent Testing Laboratory for all compliance testing of Adult-use Marijuana and Marijuana Products and Medical-use Marijuana and Marijuana Products (collectively, "Marijuana and Marijuana Products") in accordance with 935 CMR 500.160, 935 CMR 501.160, and the *Protocol for the Sampling and Analysis of Finished Marijuana Products and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers, and Colocated Marijuana Operations* and associated exhibits (collectively, the "Protocol").

The Commission, acting through its Acting Executive Director, hereby **ORDERS** as follows:

1. "Originating Independent Testing Laboratory" is the Independent Testing Laboratory that receives a Test Sample Package from a Licensee for compliance panel testing.
2. "Test Sample Package" is a representative sample of Marijuana or Marijuana Products collected by a Licensee to complete all required compliance panel testing in accordance with the Protocol.
3. As of the effective date of this Administrative Order, until its rescission or amendment, Licensees shall submit all Marijuana and Marijuana Product Test Sample Packages for all required compliance testing to one (1) Independent Testing Laboratory.
4. The Originating Independent Testing Laboratory may subcontract with another Independent Testing Laboratory to perform compliance testing if the Originating Independent Testing Laboratory is incapable of performing certain required testing, and subject to the following conditions:
 - a. Prior to transferring any Test Sample Packages to another Independent Testing Laboratory, the Originating Independent Testing Laboratory must notify the Commission that it is seeking to subcontract certain compliance panel testing by submitting a subcontracting approval form, developed by the Commission, that must specify the contract term, reason(s) for why the Originating Independent Testing Laboratory must

subcontract the compliance panel(s), and testing services to be provided by the subcontracted Independent Testing Laboratory;

- b. All subcontracting agreements must be approved by Commission staff before the Originating Independent Testing Laboratory transfers any Test Sample Packages to the subcontracted Independent Testing Laboratory;
 - c. The Commission shall only approve subcontracting agreements when the Originating Independent Testing Laboratory is incapable of performing certain required tests due to a hardship relative to its facilities, instrumentation, personnel, or required consumable materials or in the event of an actual or potential conflict of interest;
 - d. The Commission's approval of said subcontracting agreement shall be limited to approval that the Originating Independent Testing Laboratory has met the conditions required pursuant to this Administrative Order, and shall not be considered to be a certification of compliance with any other statutory or regulatory requirements;
 - e. The Originating Independent Testing Laboratory may only subcontract with one (1) other Independent Testing Laboratory at a time;
 - f. The subcontracted Independent Testing Laboratory must have the capacity to conduct full panel compliance testing required by the Commission;
 - g. The Originating Independent Testing Laboratory shall update any Standard Operating Procedures, as applicable, and send to Commission staff within five (5) business days of implementing such procedures; and
 - h. The Originating Independent Testing Laboratory shall upload all testing results to the Seed-to-Sale System of Record within 72 hours of receipt of any testing results and ensure that all Certificates of Analysis contain all required testing results, including any testing completed by the subcontracted Independent Testing Laboratory.
5. The Licensee shall not direct the Originating Independent Testing Laboratory to subcontract any required compliance testing. Subcontracting shall only be determined by the Originating Independent Testing Laboratory and subject to Commission approval in accordance with clause a. of paragraph 4 of this Administrative Order.
 6. Licensees shall not create multiple Test Sample Packages from the same Marijuana or Marijuana Product source package for compliance testing panels; provided, however, Licensees may create one (1) additional Test Sample Packages per source package for the purposes of Quality Control Samples pursuant to *Section 5.4* of the Protocol.
 7. Failure to comply with the above conditions may result in disciplinary action against Licensees and its agents up to and including a fine, suspension, and/or revocation of licensure or registration.
 8. Nothing herein should be construed as precluding or limiting the Commission's authority to take additional administrative action to protect the public health, safety, and welfare.

9. The provisions of this Administrative Order as severable. If a court of competent jurisdiction declares any provision to be unconstitutional or invalid, the validity of the remaining provisions shall not be affected.

This Administrative Order No. 4 shall take effect on April 1, 2025, at 12:00 A.M.

This Administrative Order No. 4 shall remain in effect until the date the Commission rescinds or amends this order, whichever occurs first. The Commission may amend or modify this order as applicable to one particular licensee, a group of licensees, or all Commission Licensees. The Commission, in coordination with Metrc, will issue further technical bulletins or guidance documents to clarify required processes through the Seed-to-Sale System of Record.

Questions about this order may be directed in writing to the above address, by phone (744-415-0200) on Monday – Friday from 9:00 A.M. – 5:00 P.M., or by email at Commission@CCCMass.com.

Signed this 17th day of December 2024.

Commonwealth of Massachusetts Cannabis Control Commission

Debra Hilton-Creek, Acting Executive Director



COMMONWEALTH OF MASSACHUSETTS

Protocol for the Sampling and Analysis of Finished Marijuana Products and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers, and Colocated Marijuana Operations

Implemented March 11, 2021 and Revised December 30, 2021

Massachusetts Cannabis Control Commission

Steven J. Hoffman, Chairman
Nurys Camargo, Commissioner
Ava Callender Concepcion, Commissioner
Kimberly Roy, Commissioner
Bruce Stebbins, Commissioner

Shawn Collins, Executive Director

This document is issued by the Cannabis Control Commission. The applicable Marijuana laws, which include M.G.L. c. 94I, 94G, 935 CMR 500.000 and 935 CMR 501.000, should be reviewed as they may provide or clarify the legal requirements related to this document. This protocol document should be checked periodically for revisions. Questions with regards to this document may be directed to Commission@CCCMass.com.



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1.0 Purpose and Applicability

1.1 Purpose

The purpose of this protocol is to provide Massachusetts Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations (herein referred to collectively as “Licensees”) with required and recommended best practices for the collection and analysis of plant material and other finished adult-use and medical Marijuana products and Marijuana-infused products (MIPs) to comply with Massachusetts Cannabis Control Commission’s (“Commission”) regulations: 935 CMR 500.000: *Adult Use of Marijuana* and 935 CMR 501.000: *Medical Use of Marijuana*.

This protocol is subject to revision based on evolving best practices, updated scientific information or standards/guidelines, or other information relevant to the contents of the protocol.

1.2 Applicability

This protocol applies only to Massachusetts Licensee operations, and not hardship cultivation operations. Testing requirements in this protocol apply only to adult and medical-use Marijuana and Marijuana products cultivated, manufactured, or otherwise intended to be dispensed or sold by Massachusetts Licensees, including finished Marijuana and Marijuana products (i.e., plant material, resin, concentrates and MIPs) made with finished Marijuana ingredients. This protocol only addresses sampling and analysis to characterize cannabinoid identity and content profiles, and biological (microbial and fungal) and chemical (e.g., solvents, pesticides, growth enhancers, metals) contaminants introduced through cultivation of Marijuana plants and post-harvest processing and handling of Marijuana products and ingredients.

This protocol does not apply to nutritional product testing, allergen testing, or characterization of non-Marijuana ingredients in MIPs except as noted for vaporizer products. It does not address sampling and analysis to verify compliance with state regulations or best practices for production and handling of food products, pharmaceuticals, or dietary supplements, except for criteria for biological and chemical contaminants that may be introduced through inclusion of Marijuana as an ingredient.

Sampling and analysis of environmental media used for cultivation are addressed in a companion protocol, [*Protocol for Sampling and Analysis of Environmental Media for Marijuana Establishments, Medical Marijuana Treatment Centers, and Colocated Marijuana Operations.*](#)



2.0 Definitions and Acronyms

Terms listed in italic typeface are those defined in 935 CMR 500.002: *Definitions* and 935 CMR 501.002: *Definitions*. Additional terms defined for this protocol are underlined and not in italic typeface. Capitalized terms not defined here are defined in 935 CMR 500.002 or 935 CMR 501.002.

Cannabinoid means any of several compounds produced by Marijuana plants that have medical and psychotropic effects.

Cannabinoid Profile means amounts, expressed as the dry-weight percentages, of delta-nine-tetrahydrocannabinol, cannabidiol, tetrahydrocannabinolic acid, and cannabidiolic acid in a Marijuana Product. Amounts of other cannabinoids may be reported but are not required.

Certificate of Registration means a certificate formerly and validly issued by the Department of Public Health (DPH) or currently and validly issued by the Commission, that confirms an MTC, ITL, individual or entity has met all applicable requirements pursuant to and 935 CMR 501.000: *Medical Use of Marijuana* and is licensed by the Commission. An MTC or ITL may have been issued a provisional or final Certificate of Registration. After November 1, 2019, new or renewal Licenses, as applicable, may be issued to MTCs and Independent Testing Labs.

Colocated Marijuana Operations (CMO) means an MTC operating under a License pursuant to 935 CMR 501.000: *Medical Use of Marijuana* and a Marijuana Establishment operating under at least one License pursuant to 935 CMR 500.000 on the same Premises. Colocated Marijuana Operations pertain to cultivation, product manufacturing, and retail licenses, but not any other adult-use License.

Commission means the Massachusetts Cannabis Control Commission as established by M.G.L. c. 10, § 76, or its representatives. The Commission has authority to implement the state Marijuana laws which include, but are not limited to, St. 2016, c. 334, The Regulation and Taxation of Marijuana Act, as amended by St. 2017, c. 55, An Act to Ensure Safe Access to Marijuana; M.G.L. 10, § 76, M.G.L. c. 94G; M.G.L. c. 94I; 935 CMR 500.000: *Adult Use of Marijuana*, and 935 CMR 501.000: *Medical Use of Marijuana*.

Consumer means a person who is 21 years of age or older.

Cultivation Batch means a collection of Cannabis or Marijuana plants from the same seed or plant stock and that are cultivated and harvested together and receive an identical propagation and cultivation treatment. including, but not limited to growing media, ambient conditions, watering, and light regimes, agricultural or hydroponic inputs. Clones that come from the same plant are one batch. The Licensee shall assign and record a unique, sequential alphanumeric identifier to each Cultivation Batch for the purposes of production tracking, product labeling, and product recalls.



Department of Public Health (DPH) means the Massachusetts Department of Public Health, unless otherwise specified. DPH is the agency that administered the Medical Use of Marijuana Program prior to 2019.

Duplicate Samples means two samples taken from and representative of the same material that are carried through all steps of the sampling and analytical procedures in an identical manner. Duplicate samples may be used to evaluate variance in the assessment method, including sampling and analysis.

Edibles means a Marijuana Product that is to be consumed by humans by eating or drinking. These products, when created or sold by a Marijuana Establishment or an MTC, shall not be considered a food or a drug as defined in M.G.L. c. 94, § 1.

First Amended Quarantine Order means the *First Amended Quarantine Order Applying To Vaporizer Products With Conditions* M.G.L. c.94I, M.G.L., c. 94G, § 4(a)(xix) and (a^{1/2})(xxx), 935 CMR 500.340: *Quarantine Order*, and 935 CMR 501.340: *Quarantine Order* issued by the Massachusetts Cannabis Control Commission on December 12, 2019.”

Finished Marijuana means Usable Marijuana, Cannabis resin, or Cannabis concentrate.

Finished Plant Material means usable Marijuana that has been trimmed and dried. Trimming includes removing the leaves immediately subtending the buds as well as any dead leaves or stems.

Flowering means the gametophytic or reproductive state of Cannabis or Marijuana in which the plant produces flowers, trichomes, and Cannabinoids characteristic of Marijuana.

Hardship Cultivation Registration means a registration issued to a Registered Qualifying Patient under the requirements of 935 CMR 501.027.

Independent Testing Laboratory (ITL) means a laboratory that is licensed or registered by the Commission and is:

- a) Currently and validly licensed by the Commission;
- b) Accredited to ISO 17025:2017 or the *International Organization for Standardization 17025* by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Accrediting Cooperation mutual recognition arrangement or that is otherwise approved by the Commission;
- c) Independent financially from any MTC Marijuana Establishment or Licensee; and
- d) Qualified to test Marijuana and Marijuana Products, including MIPs, in compliance with M.G.L. c. 94C, § 34; M.G.L. c. 94G, § 15; 935 CMR 500.000: *Adult Use of Marijuana*; and 935 CMR 501.000: *Medical Use of Marijuana*; and Commission protocol(s).

Licensee means a person or entity on the application and licensed by the Commission to operate a Marijuana Establishment, Marijuana Treatment Center or ITL under St. 2016, c. 334, as amended



by St. 2017, c. 55, M.G.L. c. 94G, 935 CMR 500.000: *Adult Use of Marijuana* and 935 CMR 501.000: *Medical Use of Marijuana*. Any person or entity that solely provides initial capital to establish or operate the establishment and to whom, in return for the initial capital, requires only repayment of the loan and does not have any ownership or direct or indirect authority to control the Marijuana Establishment or ITL, will not be a Licensee. For the purposes of this Guidance Document, *Licensee* will be referred to as Marijuana Establishments, Marijuana Treatment Centers and Colocated Marijuana Operations collectively.

Marijuana (or Cannabis) means all parts of any plant of the *genus Cannabis*, not excepted in 935 CMR 500.002: *Marijuana* (a) through (c) and whether growing or not; the seeds thereof; and resin extracted from any part of the plant; Clones of the plant; and every compound, manufacture, salt, derivative, mixture or preparation of the plant, its seeds or resin including tetrahydrocannabinol as defined in M.G.L. c. 94G, § 1; provided that Cannabis shall not include:

- a) the mature stalks of the plant, fiber produced from the stalks, oil, or cake made from the seeds of the plant, any other compound, manufacture, salt, derivative, mixture or preparation of the mature stalks, fiber, oil, or cake made from the seeds of the plant or the sterilized seed of the plant that is incapable of germination;
- b) Hemp; or
- c) the weight of any other ingredient combined with Cannabis or Marijuana to prepare topical or oral administrations, food, drink, or other products.

Marijuana Establishment (ME) means a Marijuana Cultivator (Indoor or Outdoor), Craft Marijuana Cooperative, Marijuana Product Manufacturer, Marijuana Microbusiness, ITL, Marijuana Retailer, Marijuana Transporter, Delivery Licensee, Marijuana Research Facility, Social Consumption Establishment or any other type of licensed Marijuana-related business, except a Medical Marijuana Treatment Center (MTC).

Marijuana-Infused Product (MIP) means a Marijuana Product infused with Marijuana that is intended for use or consumption, including but not limited to Edibles, ointments, aerosols, oils, and tinctures. A MIP when created or sold by a Marijuana Establishment or MTC, shall not be considered a food or a drug as defined in M.G.L. c. 94, s. 1. MIPs are a type of Marijuana Product.

Medical Marijuana Treatment Center (MTC), (Formerly Known as a Registered Marijuana Dispensary (RMD)), means an entity licensed under 935 CMR 501.101 that acquires, cultivates, possesses, Processes (including development of related products such as Edibles, MIPs, Tinctures, aerosols, oils, or ointments), Repackages, transports, sells, distributes, delivers, dispenses, or administers Marijuana, products containing Marijuana, related supplies, or educational materials to Registered Qualifying Patients or their Personal Caregivers for medical use. Unless otherwise specified, MTC refers to the site(s) of dispensing, cultivation, and preparation of Marijuana for medical use.

Mycotoxin means a secondary metabolite of a micro-fungus that is capable of causing death or



illness in humans and other animals. For the purposes of 935 CMR 500.000: *Adult Use of Marijuana* and 935 CMR 501.000: *Medical Use of Marijuana*, Mycotoxins shall include aflatoxin B1, aflatoxin B2, aflatoxin G1, aflatoxin G2, and ochratoxin A.

Pesticide means a substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, and any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant; provided that Pesticide shall not include any article that is a "new animal drug" within the meaning of § 201(v) of the Federal Food, Drug and Cosmetic Act (21 U.S.C. § 321(v)), or that has been determined by the Secretary of the United States Department of Health and Human Services not to be a new animal drug by a regulation establishing conditions of use for the article, or that is an animal feed within the meaning of § 201(w) of such act (21 U.S.C. § 321(w)).

Production Batch means a batch of finished plant material, Cannabis resin, Cannabis concentrate, or Marijuana-infused Product made at the same time, using the same methods, equipment, and ingredients. The Licensee shall assign and record a unique, sequential alphanumeric identifier to each Production Batch for the purposes of production tracking, product labeling, and product recalls. All Production Batches shall be traceable to one or more Cannabis or Marijuana Cultivation Batches.

Propagation means the reproduction of Cannabis or Marijuana plants by seeds, cuttings, or grafting.

Residual Solvent means a volatile organic chemical used in the manufacture of a Marijuana Product that is not completely removed by practical manufacturing techniques.

Seed-to-sale System of Record means the electronic tracking system designated and required by the Commission to perform a process (Metrc).

Tincture means a Cannabis-infused alcohol or oil concentrate administered orally in small amounts using a dropper or measuring spoon. Tinctures are not considered an Edible under 935 CMR 500.000: *Adult use of Marijuana* and 935 CMR 501.000: *Medical Use of Marijuana* and are not subject to the dosing limitations applicable to Edibles under 935 CMR 500.150(4).

Trichome means a cannabinoid-producing glandular structure that grows on the plant surface of Marijuana plants, particularly on the buds of the female plant.

Usable Marijuana means the fresh or dried leaves and flowers of the female Marijuana plant and any mixture or preparation thereof, including Marijuana, Marijuana Products or MIPs, but does not include the seedlings, seeds, stalks, roots of the plant, or Marijuana rendered unusable in accordance with 935 CMR 500.105(12)(c) and 935 CMR 501.105(12)(c).

Vegetation means the sporophytic state of the Cannabis or Marijuana plant, which is a form of



asexual reproduction in plants during which plants do not produce resin or flowers and are bulking up to a desired production size for Flowering.



3.0 Applicable Regulations

This protocol was developed to provide Licensees with guidance on complying with 935 CMR 500.000: *Adult Use of Marijuana* and 935 CMR 501.000: *Medical Use of Marijuana*. In particular, the detailed steps outlined in this protocol address requirements of the following sections of the regulations. Licensees should be familiar with the applicable regulations to ensure full compliance.

- 935 CMR 500.105(1)(h), 935 CMR 501.105(1)(h): Plans for quality control, including Marijuana product testing for contaminants.
- 935 CMR 500.105(3), 935 CMR 501.105(3): Handling of Marijuana.
- 935 CMR 500.105(5), 935 CMR 501.105(5): Labeling of Marijuana and Marijuana Products.
- 935 CMR 500.120(6), 935 CMR 500.130(4), 935 CMR 501.120(6) and 935 CMR 501.130(4): Selling and Transferring of Marijuana and Marijuana Products between Licensees.
- 935 CMR 500.160, 935 CMR 501.160 - Testing of Marijuana and Marijuana Products.



4.0 Sampling and Analysis Requirements

Sampling and analysis requirements apply to all Marijuana-containing products dispensed or sold by Massachusetts Licensees, which may include finished plant material, Cannabis resin, Cannabis concentrates (including vaporizer products), and MIPs. Because the nature and concentrations of contaminants and cannabinoid compounds may change throughout the production process, from cultivation through packaging, this section identifies the types of sampling and analysis that are required for each type of product. The results of the sampling and analysis are required for both quality control and labeling requirements (e.g., cannabinoid profile, testing certification).

Licensees must ensure and be able to demonstrate to the Commission, that product label information complies with all applicable sections of 935 CMR 500.105(5): *Labeling of Marijuana and Marijuana Products* and 935 CMR 501.105(5): *Labeling of Marijuana and Marijuana Products*.

4.1 Overview of Marijuana Products and their Production

Marijuana products that may be dispensed by Licensees in Massachusetts include finished plant material, Cannabis resin, Cannabis concentrates, and a variety of MIPs. Marijuana for all of these product categories must originate with plants cultivated by a Licensee and all product labeling must include a batch number to identify the batch associated with manufacturing and processing (935 CMR 500.105(5) and 935 CMR 501.105(5)). Therefore, Licensees are responsible for carefully tracking Marijuana throughout the production cycle, from cultivation through dispensing to consumers and patients. Marijuana and Marijuana Products procured by a Licensee from another Licensee pursuant to 935 CMR 500.120(6), 935 CMR 500.130(4), 935 CMR 501.120(6) and 935 CMR 501.130(4) must be tested by the supplying Licensee and documentation of testing consistent with this protocol must be provided to the receiving Licensee by the supplying Licensee, along with chain-of-custody documentation.

[Exhibit 1. Overview of Marijuana Production](#)

Exhibit 1 provides an overview of the adult and medical-use Marijuana production process as regulated in Massachusetts by the Commission. During cultivation, plants are typically grown from seed, cuttings, or through a tissue culture method called micropropagation (AHP 2013). Under 935 CMR 500.002: *Definitions* and 935 CMR 501.002: *Definitions*, an MIP is defined as a Marijuana Product infused with Marijuana that is intended for use or consumption including, but not limited to Edibles, ointments, aerosols, oils, and Tinctures. A Marijuana-infused Product (MIP) when created or sold by a Marijuana Establishment or MTC, shall not be considered a food or a drug as defined in M.G.L. c. 94, § 1.

Plants may be grown in soil, other solid growth media, or in hydroponic systems. All cultivation methods place the plants in contact with environmental media and other inputs, such as soil or agricultural products, which have the potential to introduce chemical or biological contaminants.¹



Because active compounds are at their highest concentration on the inflorescences of the female plant, Marijuana plants are harvested when the plants reach peak maturity. Post-harvest handling steps include drying and trimming, which should be managed carefully to avoid mold and bacterial growth and to preserve active compounds. For further details on medical Marijuana cultivation and post-harvest handling methods, refer to AHP (2013).

Harvested and dried Marijuana plants can be used directly to produce any of the three finished Marijuana types:

1. Dried and trimmed usable Marijuana, the inflorescences (i.e., “buds”), may be used directly (e.g., smoked) without further processing. It also may be used as a source material for other finished Marijuana products or as an ingredient in MIPs.
2. Cannabis resin, commonly referred to as “hashish” or “hash,” is formed by collecting and compressing cannabinoid-containing resin glands (i.e., trichomes). Cannabis resin also includes “bubble hash,” which is made by extracting the resin glands using cold water and physical separation.
3. Concentrates, which include various oils, waxes, and solids, are produced with solvent extraction methods. Vape products that heat Cannabis oils fall under this classification. Concentrates have higher cannabinoid concentrations than other finished Marijuana products, but also may contain residuals of potentially harmful solvents if not manufactured properly. In addition, any contaminants present in the source plant material may be concentrated in a resin or concentrate product.

4.2 Commission Marijuana Testing Requirements

Testing for finished Marijuana and Marijuana products includes screening for chemical and biological contaminants (Section 4.2.1) and cannabinoid profile testing (Section 4.2.2). Section 4.2.3 discusses methods for determining the amount of usable Marijuana contained within a dispensed or sold product, as required for product labeling. Sections 5.0 through 7.0 further describe the detailed sampling frequency, sample collection procedures, and analyses required for contaminant and cannabinoid profile testing.

This protocol defines the minimum testing required to conform with 935 CMR 500.000: *Adult Use of Marijuana* and 935 CMR 501.000: *Medical Use of Marijuana*. Licensees have discretion to perform analysis beyond these requirements.

¹ Testing for media used in Marijuana cultivation is discussed in the companion *Protocol for Sampling and Analysis of Environmental Media for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations*.



Product problems should be reported to the Commission when there is a concern about the quality, authenticity, performance, or safety of any finished Marijuana or Marijuana product. Problems with product quality may occur during manufacturing, shipping, or storage. These may include:

- suspected counterfeit product;
- product contamination;
- defective components;
- poor packaging or product mix-up;
- questionable stability;
- labeling concerns; and
- unknown fillers and cutting agents

Testing laboratories and Licensees are often the first to recognize a product quality problem. Individuals shall report any concerns to the Commission by phone: (774) 415-0200; email: Commission@CCCMass.com; or via Mail to:

Cannabis Control Commission
ATTN: DIRECTOR OF INVESTIGATIONS
2 Washington Square Union Station 2nd Floor Worcester, MA 01604

4.2.1 Contaminant Testing

Contaminant testing requirements are based on the contaminants potentially introduced at each stage of production. [Exhibit 2](#) identifies the potential contaminants of concern during each stage of Marijuana production and the testing requirements for each product type.

Cultivation

Cultivation is not in the scope of testing of this protocol but is included in Exhibit 2 to identify the contaminants of concern potentially introduced during cultivation. These include non-organic pesticides, metals, and other synthetic organic compounds in environmental media or other cultivation inputs (e.g., soil amendments, hydroponic products), as well as fungal and bacterial growth on the plants. Environmental media must be tested, as described in the Protocol for Sampling and Analysis of Environmental Media for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations, to reduce the introduction of chemical contaminants during cultivation. However, this testing will not necessarily ensure that the Marijuana plants are free of chemical contaminants and does not address fungal/bacterial infestation. Therefore, Marijuana products must be tested for chemical contamination before they can be distributed, dispensed, or sold and consumed.

Marijuana should be cultivated and harvested in traceable “cultivation batches,” such that all Marijuana within a cultivation batch has been produced with the same seed or plant stock, soil or



other solid growing media, water, other agricultural/hydroponic inputs, and growing conditions. Cultivation batches should be sequentially numbered and traced throughout post-harvest production steps, and manufacturing/processing batch numbers must be included on the labels of all products to facilitate product recalls.

Finished Plant Material

Finished plant material dispensed or sold to patients or consumer consists of usable Marijuana that has been trimmed and dried. Trimming includes removing the leaves immediately subtending the buds as well as any dead leaves or stems. A “production batch” of finished plant material must be traceable to one or more cultivation batch(es). All production batches of finished plant material must be tested for pesticides and metals, which may be introduced during cultivation. Production batches intended for dispensing and direct use as adult use or medical product must also be tested for biological contaminants (bacteria, fungi, and mycotoxins), as shown in Exhibit 2.

Finished plant material is tested instead of living or freshly harvested plants because drying and trimming may affect the concentrations of contaminants and because fungal/bacterial growth may occur during finishing.

Finished plant material that exceeds a limit (see Section 7.0) for any contaminant included in the required testing cannot be distributed as finished Marijuana without first being reanalyzed and/or remediated pursuant to 935 CMR 500.160(13) and 935 CMR 501.160(12). The Commission may require additional contaminant screenings to ensure compliance.

Cannabis Resins and Concentrates

Cannabis resins and concentrates may be produced from the finished plant material of one or more cultivation batches. If the finished plant material fails to meet a required testing requirement, but the finished plant material is not dispensed or sold to a patient or consumer, then it may be used to derive resins and concentrates. The resins and concentrates may be dispensed or sold as long as they meet the respective concentration limit identified in Section 7.0. Each production batch of Cannabis resin or concentrate must be given a sequential identifier for product tracking and labeling. The Licensee must keep records of the Marijuana cultivation batch(es) used for each production batch and include the manufacturing/processing batch number on product labels.

Testing requirements for Cannabis resins and concentrates are summarized in Exhibit 2. Because these products may be made only from plant material that has already tested below limits for pesticides, testing for these contaminants is not required again. However, Cannabis concentrates must be tested for metals, as well as residual solvents if solvents were used in their production. If Cannabis concentrates are produced or extracted with solvent free processes, a solvent screening is not required. Specifically, testing is required for any solvent used to make a Cannabis concentrate production batch.

All Cannabis resin or concentrate production batches intended for distribution to patients and consumers as finished Marijuana products must be tested for bacteria, fungi, and mycotoxins.



Testing for these biological contaminants is not required for Cannabis resin or concentrate production batches that will be used only to manufacture MIPs.

If required testing finds that a production batch of Cannabis resin or concentrate exceeds any applicable contaminant limit (see Section 7.0), the production batch cannot be dispensed or sold as a finished Marijuana product without first being reanalyzed and/or remediated followed by additional required contaminant screening to ensure compliance.

Marijuana Vaporizer Products

The provisions set forth in this protocol, in conjunction with 935 CMR 500.105(5)(c)(7), 935 CMR 500.140(13), 935 CMR 500.160(2), 935 CMR 501.105(5)(c)(7), 935 CMR 501.160(2) and 935 CMR 501.140(11), aim to mitigate the known risks associated with Marijuana vaporizer products that utilize concentrated marijuana oils (vape products). At the time of adoption of this protocol there remain many unknown factors and variables regarding the long-term use and overall effects of using vape products. This section of the guidance protocol addresses several issues and challenges faced when regulating legal vape products in the Commonwealth.

The Commission will continue to facilitate the availability of regulated, legal vape products while also taking steps toward mitigating potential health risks associated with vape products. The Commission understands the need to continue to develop and implement regulations and guidance informed by scientific research that will reflect additional studies into the health effects of utilizing vape products. This Guidance Protocol document shall be updated as new information becomes available to the Commission through its ongoing investigations and findings, as well as through industry research and scientific studies.

Marijuana-Infused Products

The Commission assumes that all MIP production batches will be destined to be either dispensed or sold for patient or consumer use. Therefore, all MIP production batches must be tested for biological contaminants (bacteria, fungi, and mycotoxins). Production batches must be discarded and not dispensed or sold to patients or consumers if any biological contaminant limit is exceeded.

MIPs may be made only with finished Marijuana products that have passed applicable metals, pesticide, and solvent testing requirements. For this reason, testing MIPs for metals, pesticide, and solvent contaminants is not required. However, Licensees have discretion to perform this testing of MIPs voluntarily.

Each MIP production batch must be given a sequential identifier (ID) for product tracking and labeling. Records must be kept that identify the cultivation batch(es) and finished Marijuana production batches associated with each MIP production batch. The manufacturing/processing batch number must be included on product labels to aid in product tracking and recalls.



4.2.2 Cannabinoid Profile Testing

All Marijuana products, shown in Exhibit 1, including any finished Marijuana or MIP, must bear a label that identifies the list of ingredients, including the cannabinoid profile of the Marijuana contained within the product, including the THC level (935 CMR 500.105(5), 935 CMR 501.105(5)). Therefore, for the purposes of labeling Marijuana products in Massachusetts, the cannabinoid profile must include, at a minimum, the percentage by dry weight (i.e., the weight of the material remaining after it has been thoroughly dried) of D9- tetrahydrocannabinol (D9-THC), cannabidiol (CBD), tetrahydrocannabinolic acid (THCa), and cannabidiolic Acid (CBDa). Medicinal benefits have been attributed to other cannabinoids, and these compounds may be included in the cannabinoid profile at the discretion of the Licensee

It is important to note that heat (including combustion) can cause chemical reactions that convert cannabinoids to more or less potent forms. For example, combustion (e.g., during smoking) causes non-psychoactive cannabinoid acids, abundant in the plant material, to be converted to psychoactive forms.

Because production of finished Marijuana products and MIPs may affect cannabinoid chemistry, as well as the concentration or dilution of active ingredients, each product type must be tested to characterize the cannabinoid content and profile.

4.2.3 Usable Marijuana Content

935 CMR 500.105(5)(a)(4), (b)(4),(c)(4),(d)(5) and 935 CMR 501.105(5)(a)(4), (b)(4), (c)(4), (d)(5) require labels of Marijuana products to identify the net weight, which does not include packaging, or volume of usable Marijuana contained within the product expressed in U.S. customary units and metric units. Massachusetts has determined that 10 (ten) ounces of finished plant material is the maximum 60-day supply allowed for medical marijuana patients. While the 60-day supply defaults to 10 (ten) ounces of finished plant material, the 60-day supply may be modified by a Certifying Healthcare Provider.

When finished plant material is used to derive Cannabis resin or concentrates, processing alters the physical form and quantity (i.e., weight and volume) of the usable Marijuana. To enable the comparison of usable Marijuana in the various product types, DPH originally developed assumptions that should be used to express the quantity of usable Marijuana in Cannabis resins or concentrates in terms of the equivalent ounces of plant material. Based on Colorado Department of Revenue (2015) sources previously reviewed by DPH, it can be assumed that the yield of a Cannabis resin or concentrate is 19 percent of the starting weight of plant material.

This is based on the assumption that a typical butane extraction from 28.4 g (1 oz.) of flower will yield 5.5 g of oil.

When the weight of Cannabis resin or concentrate in a dispensed product is known, the quantity of usable Marijuana, expressed in equivalent plant material weight, should be calculated by



multiplying the resin or concentrate weight by 5.3 (i.e., $1 \div 0.19$). For example, the quantity of usable Marijuana in 1.9 ounces of Cannabis oil is 10 ounces (1.9 ounces of Cannabis oil x 5.3 = 10 ounces of usable Marijuana). Therefore, 1.9 ounces of Cannabis oil is equivalent to the maximum 60-day supply of useable plant material, unless otherwise modified by a Certifying Healthcare Provider.

The amount of usable Marijuana in a MIP is equal to the amount of usable Marijuana included in the product ingredients, measured before mixing, baking, or other processing or manufacturing steps. If more than one type of finished Marijuana ingredient is used to prepare a MIP, the amount of usable Marijuana in the MIP is the sum of the usable Marijuana in the ingredients.



5.0 Sampling Program Design

Under 935 CMR 500.160(2) and 935 CMR 501.160(2), Marijuana and Marijuana products must be tested for the cannabinoid profile and contaminants. The Marijuana products to be tested include: finished plant material (i.e., inflorescences or “buds”), Cannabis resin, Cannabis concentrates, and various types of MIPs. The purpose of testing is to ensure product quality and safety, and to provide information needed for product labeling requirements.

Because it is not possible to test all Marijuana, Licensees must collect representative samples to provide to one of the Commission’s licensed Independent Testing Laboratories. Specifically, each Marijuana production batch must be sampled and analyzed, and the samples collected for a production batch must be representative of all of the Marijuana in the batch. The protocol provides the following definition of production batch:

Per 935 CMR 500.002 and 935 CMR 501.002, Production Batch means a batch of finished plant material, Cannabis resin, Cannabis concentrate, or Marijuana-infused Product made at the same time, using the same methods, equipment, and ingredients. The Licensee shall assign and record a unique, sequential alphanumeric identifier to each Production Batch for the purposes of production tracking, product labeling, and product recalls. All Production Batches shall be traceable to one or more Cannabis or Marijuana Cultivation Batches.

Samples from each Production Batch must be collected in a ready-to-use condition. For Production Batches that will be dispensed or sold to patients or consumers, ready-to-use means ready for packaging or post-packaging. For other Production Batches, ready-to use means ready for use as an intermediate or ingredient in making other products. After samples are collected, the entire Production Batch must be stored in a secure, cool, and dry location until analytical results are returned by the laboratory.

Sampling frequency is dictated by the production schedules, which may vary among Licensees due to scale, product types dispensed and sold, and patient and consumer demand. The Licensee is responsible for implementing a Production Batch tracking approach that meets the regulatory needs and definitions as well as ensuring representative sample collection and analysis of those batches. The Licensees must be able to demonstrate to the Commission that the production tracking, sampling, and analysis procedures are capable of obtaining representative samples. The guidelines below are provided to aid Licensees in developing an approach that meets Commission requirements for representativeness.

To perform required testing, Licensees will collect samples to be analyzed by licensed and appropriately certified ITL, as noted in Section 7 of this protocol. The amounts of sample required for cannabinoid or contaminant testing may vary by analytical method and laboratory- specific procedures, therefore the Licensee should confer with the ITL to determine the minimum sample size required for evaluation. In all cases, the amount of sample supplied to the laboratory should be large enough and sufficiently homogenized to provide a representative sample of the Production



Batch but not in excess to raise issues with possible diversion or waste disposal.

5.1 Representative Sampling

Specific procedures for collecting representative samples of Marijuana Production Batches are likely to vary depending on several attributes of the products and production methods:

Homogeneity – A sample is more likely to accurately represent the Production Batch if the material is homogenous (i.e., well mixed). Mixing or other homogenization steps help to homogenize the product before sample collection.

Physical Form – Production Batches will vary in physical form (e.g., liquids, solids), density, and viscosity. Physical form can affect homogeneity, homogenization steps, and sample collection methods. For example, liquid products can be homogenized by stirring. Grinding and other methods described further below can be used to homogenize solid products.

Quantity – Because Production Batches may vary in scale (i.e., volume or weight), varying numbers or sizes of samples may be required to promote representativeness.

In addition, sample representativeness can be affected by the timing and frequency of sample collection. Because of variation among production schedules (e.g., due to product type, production scale, patient, and consumer demand), sampling frequencies will vary among Licensees and Production Batches. However, representativeness will be ensured by the requirement that all Production Batches are tested.

5.2 Representative Sampling by Physical Form and Quantity

[Exhibit 3](#) provides instructions for representative sampling of Marijuana Production Batches, including finished Marijuana products and MIPs. These instructions were developed based on sampling guidance for food products and herbal medicines developed by the United States Pharmacopeia Chapter 561 (USP, Undated-b), and account for differences in the physical forms of the Production Batches as they relate to homogeneity and quantity. If application of these guidelines is impractical for specific products, it is the responsibility of the Licensee to develop and document a scientifically defensible sampling approach.

Homogeneity plays an important role in methods for representative sampling. While liquid products such as Cannabis oil and liquid MIPs can be stirred or mixed to homogenize the product before sampling, other products such as Cannabis resin, baked goods, or hard candies cannot. Homogenization of some solid products, such as ground plant material or semi-solid resin is possible. Because of its importance, further guidance on homogenization methods is provided in Section 5.3.



5.3 Sampling Guidance by Matrix

Finished Marijuana products and MIPs can be in varied physical states or matrix (e.g., liquids to hard solids). To better understand the specific requirements the following guidance is provided based on the matrix of the material to be characterized.

Liquids (Cannabis Oil and Some MIPs)

Liquid products such as Cannabis oil or liquid MIPs should be thoroughly stirred or mixed before sampling to ensure homogenization of the sample. Cannabis oil or other liquid Cannabis from each Production Batch should be sampled using units of volume. Samples of concentrates or oils should be collected following each Production Batch if they are to be dispensed or sold, and before any further processing into MIPs.

Finished Plant Material or Friable MIPs

Sampling shall be performed such that the dried and trimmed inflorescences, or buds, of the Marijuana plant that are collected are representative in maturity and composition of the entire production Batch of finished plant material. The sampling timeframe for Marijuana buds should be after the completion of the finishing (i.e., drying and trimming) of the plant material Production Batch.

Homogenization of the finished plant material may be difficult to accomplish prior to sampling due to the heterogeneous nature of the finished plant material. Recommendations from ISO 1839-1980 guidelines for sampling loose leaf tea (i.e., a material similar in nature to Cannabis plant material) state that in most cases it is “impracticable and purposeless” to re-blend the contents of a large container of tea in order to obtain a representative sample. USP guidance for sampling articles of botanical origin (USP Chapter <561>) recommends that, for items with component parts larger than 1 cm in any dimension, samples should be withdrawn by hand, then combined and mixed prior to analysis. ISO 1839-1980 also states that if the primary samples consist of loose material, they should be combined to constitute the bulk sample for evaluation.

Quartering is a method to promote the representativeness of a homogenized Marijuana sample. Quartering involves heaping the adequately mixed and homogenized ground product into a square shape, dividing the heap into four equal quarters, and selecting samples from two of the opposite quarters, which are mixed and sampled (Sexton and Ziskind, 2013; USP Chapter <561>; WHO, 2007). The remaining quarters may then be combined and mixed, then used for microbiological and contaminant testing (Sexton and Ziskind, 2013; USP Chapter <561>; WHO, 2007). The quartering process may be repeated until the required quantity is obtained, and the remaining material may be returned to the batch if possible (USP Chapter <561>; WHO, 2007).



Solids and semi-solids (Cannabis Resin and Some MIPs)

Solid and semi-solid products such as resin should be ground and thoroughly mixed, if possible, to be homogenized (USP Chapter <561>; WHO, 2007). A grinding device that minimizes loss (e.g., leaching of resins from finished plant material) should be used, and the grinding device should be cleaned thoroughly after each use. Once ground, quartering, as described above, can be used to collect the sample.

If grinding is impracticable, subsamples of the product should be taken from different areas of the product mass. For example, it might be possible to slice the product mass in sections prior to collection of subsamples or take the subsamples directly from different locations on the product surface (e.g., lower, middle, and upper).

Resin and other solids should not be melted as a means of homogenization. Heating the product may alter the cannabinoid profile or contaminant levels (WHO, 2005) thereby rendering the sample unrepresentative of the source product.

When subsamples are required, subsamples should be composited (combined), if possible, and mixed to obtain a quantity sufficient for evaluation. The quantity sufficient for evaluation may vary by analytical method and laboratory-specific procedures, therefore the Licensee should confer with the ITL to determine the minimum sample quantity required for evaluation.

Compositing subsamples may be impractical for some product types (e.g., hard candies or other products in discrete solid units). In these cases, individual product units can be provided to the ITL as samples for analysis. In some cases, the ITL may combine extracts or digestates prepared from the solid subsamples and analyze the volumetrically combined extract/digestate as a composite.

5.4 Quality Control (QC) Samples

Duplicate samples shall be collected to provide verification of sampling and laboratory procedures. Specifically, a duplicate should be collected for 5 percent (1 per 20) of the samples collected for each Marijuana product type. Duplicate samples shall not be identified to the ITL (this is considered blind quality control). Duplicate samples are used to evaluate any variance in the sampling and analysis procedures. To ensure authenticity, it should be noted that QC samples should be taken on the same day and be derived from the same batch.



6.0 Sample Collection Procedures

This section describes sample collection procedures that are generally applicable to any Marijuana product that Licensees may dispense or sell, including, but not limited to, finished plant material; liquid concentrates or MIPs; resins, waxes, creams, or other semi-solid products; or solid concentrates or MIPs; or vape products. Because of the wide range of Marijuana products that Licensees may offer, particularly MIPs, these sample collection procedures may require adaptation in some cases.

In all cases, sample collection must be conducted in a manner that provides analytically sound and representative samples so that all Marijuana products dispensed or sold are safe, effective, and accurately labeled. The Licensee must document every sampling event and provide this documentation to the Commission upon request.

Prior to Sample Collection, the Licensee should assemble all equipment and information needed before beginning. Items to assemble before sampling include, but are not limited to, the following:

- Sample collection plan for each product type;
- Logbook or sample collection forms;
- Chain-of-custody forms (COCs);
- Disposable gloves;
- Decontaminated tool(s), such as a spatula, knife, sampling spear, or pipette;
- Stainless steel bowl and implement to homogenize the product (e.g., by stirring, chopping, or grinding);
- Clean decontaminated surface for sample processing;
- Sample containers appropriate for the analyses required;
- Container labels and pen with indelible ink;
- Supplies to thoroughly clean, decontaminated, and dry sampling equipment between samples; and
- A cooler with ice to keep samples cool until refrigeration or shipment to the laboratory.

Sample collection personnel should create a new entry for each sampling event in a sample collection logbook or prepare sample collection forms for documentation of sample collection. Sample collection documentation should identify the sample collection date and start time, participating personnel, a general description of the product type and batch number sampled, a description of the sampling procedures used, and a record of batches that would potentially be impacted should analysis results indicate unacceptable contamination levels.

Sample collection personnel shall identify or determine the Cultivation Batch number, Production Batch, and number of samples to be collected based on the guidance provided in Section 5, as well as further guidance obtained in consultation with the ITLs. The number of samples taken from each Cultivation and/or Production Batch must be recorded in the sample collection logbook or



forms. Record the sample Cultivation and/or Production batch identifiers (ID) for each sample.

The batch IDs will be included on sample labels. In addition to the batch ID, create a unique sample ID for each sample. Sample identifiers should be unique for a given sample event.

Record the batch and sample IDs in the sample collection logbook.

Any tools that contact the samples should be made of stainless steel or other inert material to avoid potential contamination of the sample. Appropriate sample containers should be made of suitable materials.

Preparing sample labels and affixing them to sample containers immediately before sampling is recommended. Information to include on the label includes at a minimum the batch and sample IDs and date/time of collection and by whom. Additional information that must be recorded in documentation, if not on the label, includes sample collector's name, product type, collection method, and other details about the product, such as MIP type or production method.

Sample Collection. Collect the planned samples from each cultivation or production batch one at a time. Follow these basic steps for each sample:

1. Wear disposable gloves to mitigate potential for contamination of samples.
2. Ensure that the sampling area is clean and decontaminated and lay out any tools and equipment needed.
3. Collect the sample using an appropriate tool. Do not touch the sample with your hands or allow the sample to touch anything that might cause cross contamination.
4. If necessary, place the sample in the stainless-steel bowl or on a decontaminated cutting surface for homogenizing the sample using either the sample collection tool or separate clean, decontaminated implement.
5. Record the time each sample was collected and record any difficulties, inconsistencies with the sampling plan, or other remarks (e.g., environmental conditions) that might be relevant to data analysis or quality assurance.
6. To avoid cross contamination of samples, any tools or equipment that comes in contact with the finished plant material or other Marijuana products should be cleaned before collecting the next sample.
7. All samples should be placed in clean, airtight sample containers that are large enough to hold the prescribed sample quantity with minimal headspace. Sample containers must be firmly closed and appropriately labeled.
8. To preserve the chemical and biological composition of the samples, they should be refrigerated or maintained on ice until shipped to the analytical laboratory.
9. Chain-of-custody paperwork should be completed immediately prior to shipment to the analytical laboratory.

Marijuana products and MIPs, especially solids or semi-solids such as finished plant material, may be heterogeneous with respect to distribution of cannabinoids or contaminants. To obtain a



representative sample, liquid products should be thoroughly stirred or mixed before sampling. Solid and semi-solid products must be ground and thoroughly mixed. A grinding device that minimizes loss (e.g., leaching of resins) should be used, and the grinding device should be cleaned thoroughly after each use.

Another method to promote the representativeness of a ground Marijuana product is quartering. Quartering involves heaping the ground product, dividing the heap into four equal quarters, and selecting samples from two of the quarters, which are combined and mixed (Sexton and Ziskind, 2013). The remaining quarters may then be combined and mixed, then used for microbiological and contaminant testing (Sexton and Ziskind, 2013).

Resin and other solids should not be melted as a means of homogenization. Heating the product may alter the cannabinoid profile or contamination levels (WHO, 2005) thereby rendering the sample unrepresentative of the source product.

Edible products tend to be relatively homogeneous (Sexton and Ziskind, 2013), so a selection of packaged or ready-to-dispense MIPs may be provided to the analytical laboratory to represent a given production batch (Sexton and Ziskind, 2013). MIPs may be either liquid or solid, and the solid MIPs may be of varying density (e.g., baked goods and candies). Laboratory samples of MIPs shall be homogenized prior to testing such that the sample is representative of the whole product. Homogenized samples should be mixed and quartered similar to the procedure described above. If production batches of individually packaged MIPs are sampled, multiple packaged products should be sampled such that they are representative of the production batch size.



7.0 Sample Analysis

All sample analyses described in this protocol shall be conducted by an Independent Testing Laboratory (ITL) that is either:

1. Accredited to International Organization for Standardization (ISO) 17025 by a third-party accrediting body such as A2LA or ACLASS, or
2. Certified, registered, or accredited by an organization approved by the Massachusetts Department of Public Health.
3. Licensed with the Commission pursuant to 935 CMR 500.050(7) and 935 CMR 501.052.

Further requirements concerning the eligibility and responsibilities of analytical laboratories are provided in 935 CMR 500.029 and 935 CMR 501.029.

In addition to the regulatory qualifications and requirements referenced above, the ITL should have a demonstrated ability to perform the specific analytical methods required and to provide defensible documentation and quality assurance.

The sections below identify the analytical methods and analyses required for characterizing the cannabinoid profile of Marijuana products, as well as the presence and levels of potential contaminants, including metals, pesticides and plant growth regulators, microbiological contaminants and mycotoxins, and residual solvents.

7.1 Cannabinoid Profile

Although many cannabinoids and related compounds are present in the Cannabis plant, characterization of the cannabinoid profile should include, at a minimum, the dry-weight percentage of delta-nine-tetrahydrocannabinol (D9-THC) and cannabidiol (CBD).

Because target cannabinoid contents and ratios may vary depending on the desired dosage and other use considerations, minimum profile standards are not mandated. However, the cannabinoid profile must be included in product labeling under 935 CMR 500.105(5) and 935 CMR 501.105(5). Analytical procedures for determining cannabinoid profiles are available in AHP (2013).

7.2 Metals

Finished Marijuana products must be tested for the four metals listed in [Exhibit 4](#). Quantification of metals must be performed with a validated method. A production batch of finished Marijuana products (e.g., finished plant material, Cannabis resin, or Cannabis concentrate) may only be dispensed or sold to patients or consumer if all four of the metals are below the upper limits for the respective product and intended use specified in Exhibit 4 (e.g., ingestion only or all other uses). These limits are in micrograms (μg) of contaminant per kilogram (kg) of product



If the quantification of metals in finished Marijuana is below the upper limits specified for “Ingestion Use Only”, as described in Exhibit 4 (b), the production batch of finished Marijuana must bear the additional label:

“THIS PRODUCT HAS BEEN EVALUATED FOR IMPURITIES BASED ON ORAL CONSUMPTION ONLY. DO NOT INHALE THIS PRODUCT.”

7.2.1 Metals and Marijuana Vape Products

Heavy metal accumulations are an issue of particular concern when analyzing and assessing the potential health impacts associated with the use of vape products. Instances of elevated levels of heavy metals have been identified in vape products tested by the Commission that have been subject to quarantine in accordance with the *First Amended Quarantine Order Applying to Vaporizer Products with Conditions* (“First Amended Quarantine Order”), issued on December 12, 2019. In some cases, the sampled vape product(s) failed testing due to heavy metal concentrations in excess of allowable limits. The upper allowable limit for heavy metals in Marijuana and Marijuana products is 500 parts per billion (ppb) for all uses and 1,000 ppb for ingestion only as stated in Exhibit 4.

The leaching of heavy metals into vape products may be due to a number of factors including time, device composition, temperature, and usage. The factor of time is particularly concerning because it is not known how long leaching occurs after vape devices are filled with cannabis oil. In the absence of sufficient information developed over the course of long-term studies regarding vape devices that all potential contributing factors that impact the leaching of metals into vape products will continue to be monitored and investigated by the Commission. Accordingly, Licensees shall continue to conduct a second heavy metal screening requirement on all finished vape products subject to the First Amended Quarantine Order.

Every vape product sold must be accompanied with a written insert at the point of sale which identifies the manufacturer of the device and its known components, including the battery, and discloses materials used in the device’s atomizer coil (e.g. titanium, titanium alloy, quartz, copper, nichrome, Kanthal, or other specified materials). Specific additives used in the production of the vape product, including thickening agents, thinning agents, and terpenes, shall also be disclosed along with their Certificates of Analysis. The Commission will continue to gather information



regarding the manufacturing and design specifications of the vape cartridge and devices and will update this Guidance Protocol regarding heavy metal accumulations in vape products accordingly.

7.3 Pesticides Residues and Plant Growth Regulators

Non-organic pesticides may not be used to cultivate Marijuana in Massachusetts (935 CMR 500.120(5) and 935 CMR 501.120(5)). As discussed in Section 5, all production batches of finished plant material must be tested for residues of prohibited pesticides. At a minimum, samples of finished plant material must be tested for the pesticides, including plant growth regulators, listed in [Exhibit 5](#). Exhibit 5 identifies appropriate analytical methods for each of the listed pesticides.

A production batch of finished plant material may be dispensed to consumers, patients or be used to make other Marijuana products if no individual pesticide or plant growth regulator is detected above 10 ppb. A laboratory that is unable to perform the required testing of pesticide residues at or below the 10 parts per billion (ppb) criteria may determine compliance by ensuring that any pesticide residues are present at a level less than or equal to 5 percent of the US EPA tolerance for the specific residue. EPA pesticide tolerances are available from Title 40 of the Code of Federal Regulations (CFR). In such circumstances, DPH should be notified regarding the specific pesticides to which this method is being applied.

Marijuana and Marijuana products shall be tested for contaminants specified by the Commission but not limited to any plant growth regulators and the presence of pesticide. State law prohibits use of pesticides on marijuana cultivation. The Commission applies a 10 parts per billion (10 ppb) threshold to determine detection of pesticides for purposes of compliance with pre-market testing requirements. Any product that obtains a true value at the limit of detection (LOD) concentration means there is at least a 99% probability of reporting a detection. Pesticide detection above the LOD but below the quantification limit (BQL) is also considered out of compliance.

The ITL's shall report the pesticide levels in Marijuana products that are detected in the certificate of analysis. If a sample is found to contain pesticides or is above the permissible limits in the pesticides table (exhibit 5), it is considered out of compliance and or a failure. Under 935 CMR 500.120(5) and 935 CMR 501.120(5) licensees are required to immediately report to the Commission any test result indicating pesticide noncompliance. The associated product batch may not be released for retail sale and may not be remediated.

Exhibit 5 requires Marijuana and Marijuana products to be tested for the following pesticides:

1. Bifenazate (Miticide)
2. Bifenthrin (Insecticide)
3. Cyfluthrin (Insecticide)
4. Extoxazole (Insecticide/Insect Growth Regulator)
5. Imazalil (Fungicide)
6. Imidacloprid (Insecticide)



7. Myclobutanil (Fungicide)
8. Spiromesifen (Insecticide)
9. Trifloxystrobin (Fungicide)

Acknowledging that no method currently exists that analyzes all registered pesticides efficiently (USDA, 2012a), USDA developed a “target” analyte list of 195 prohibited pesticides (USDA, 2011). Under USDA procedures for pesticide residue testing in organic food (USDA, 2013; USDA, 2014), Specifically, pesticide testing should be performed consistent with the following sections of National Organic Program Handbook: Guidance and Instructions for Accredited Certifying Agents and Certified Operations (USDA, 2014):

NOP 2611: Laboratory Selection Criteria for Pesticide Residue Testing NOP 2611-1: Prohibited Pesticides for NOP Residue Testing
NOP 2613: Responding to Results from Pesticide Residue Testing

A further discussion of the application of this testing approach is available in USDA’s 2010 - 2011 Pilot Study Pesticide Residue Testing of Organic Produce (USDA, 2012b).

7.4 Microbiological Contaminants and Mycotoxins

Analytical requirements for microbiological contaminants and mycotoxins are listed in [Exhibit 6](#). Requirements for total viable aerobic bacteria, total yeast and mold, total coliforms, and bile-tolerant gram-negative bacteria are given in colony forming unit (CFU) counts per mass of product sample. The requirement for pathogenic *E. coli* and *Salmonella* spp. is based on detection in a one-gram sample, and the requirement for mycotoxins is based on the concentration per kilogram of sample. Analytical methods for enumerating and identifying specific microbiological contaminants must be consistent with the following United States Pharmacopeia (USP) chapters:

- USP Chapter <61>: Microbiological Examination of Nonsterile Products: Microbial Enumeration Tests. USP 36, Chapter <61>
- USP Chapter <62>: Microbiological Examination of Nonsterile Products: Tests for specified Microorganisms. USP 36, Chapter <62>

Analytical methods for mycotoxins must be consistent with USP chapter:

- USP Chapter <561>: Articles of Botanical Origin. USP 36, Chapter <561>

7.5 Residual Solvents

As discussed in Section 4.2.1, residual solvents testing is required only for Cannabis resins and concentrates where solvents have been used in the production process. In particular, a production batch of Cannabis oil may be dispensed or sold as a finished Marijuana product or used to make



another Marijuana product only if:

- Laboratory analysis verifies that all solvents used at any stage of Cannabis oil production, except in cleaning equipment, are below the limits provided in Exhibit 6; and
- The production batch passes all other applicable testing requirements.

Only solvents listed in [Exhibit 7](#) may be used in the production of Cannabis oil. A Licensee is required to test only for those solvents used, and it is not required to test for any residual solvents if it can document that no solvents were used in the Cannabis oil production process.

The upper limits for residual solvents in Exhibit 7 are given as milligrams of residual solvent per kilogram of Cannabis oil. The upper limits are based on residual solvent standards provided by the United States Pharmacopeia (USP Chapter <467>), the International Conference on Harmonization (ICH, 2011), and AHP (2013). Consistent with the standards provided by these sources, “Class 1” solvents including benzene, carbon tetrachloride, 1,2- dichloroethane, 1,1-dichloroethene, and 1,1,1-trichloroethane may not be used in the production of any Marijuana product.

Analyses to determine residual solvent concentrations in Marijuana products must be performed in accordance with the methods identified in USP Chapter <467>.

7.6 Vitamin E Acetate

Vitamin E Acetate (VEA) is a contaminant of concern that has been linked to unregulated vape products acquired on the illicit market. The Center for Disease Control and Prevention has previously identified VEA as a potential contributor to the 2019 EVALI (e-cigarette or vaping product use associated lung injury) outbreak. While results from tests ordered by the Commission show that no licensed vape product tested positive for VEA, the Commission will continue to require mandatory VEA testing on final, ready-to-sell vape products until a final determination between VEA and EVALI has been reached by the CDC or until the Commission amends its First Amended Quarantine Order and issues any further administrative order apply to vaporizer products.

The Marijuana vape product guidance protocol recommends that for a final, ready-to-sell vape product, a test sample of the finished product containing at least one (1) gram of marijuana oil must be sent to one of the Commission’s licensed ITLs for heavy metal and VEA testing. A one (1) gram test sample will provide the ITLs with enough source material to run the required tests in addition to any duplicative screenings if needed. The one (1) gram sample size amount takes into consideration the inherent challenges and difficulties with extracting marijuana oil from final, ready-to-sell vape products.

Marijuana vape products will continue to receive all required contaminant testing for concentrates as required under 935 CMR 500.160 and 935 CMR 501.160. Additionally, per the Commission’s First Amended Vape Order and 935 CMR 500.160 and 501.160, final ready-to- sell vape products



must also pass a second heavy metal screen in addition to a Vitamin E Acetate (VEA) screen.

To date, a standardized method for opening Marijuana vape products and extracting the oil contents has not been developed by any of the Commission's licensed ITLs. The Marijuana oil from the pre-filled vape products must first be carefully extracted from the device or cartridge before conducting the heavy metal and VEA tests to prevent introducing contaminants. Many of the vaporizer product devices are not constructed in a manner that easily allows them to be reopened after being sealed. These vaporizer products are not easily opened once sealed partly due to concerns with tampering of finished devices. Care must be taken during the extraction process such as not to introduce metal fragments that may inadvertently become loose from tools or instruments. The Commission will continue to work with the ITLs and vape product device manufacturers in efforts to eventually create standardized instructions for extracting marijuana oils from final, ready-to-sell vape products.



8.0 Data Evaluation

Licensees are required to reanalyze or remediate failed Marijuana and Marijuana products pursuant to 935 CMR 500.160(13)(a),(b), and (c) and 935 CMR 501.160(12)(a),(b) and (c). Upon receiving notification that Marijuana or Marijuana product has failed any test for contaminants, the Licensee shall either reanalyze the Marijuana or Marijuana product, shall take steps to remediate the Marijuana or Marijuana product or destroy the Marijuana and Marijuana product. Licensees must ensure that any failed Marijuana and Marijuana product are properly remediated through the Commission's Seed-to-sale System of Record (Metrc).

Reanalysis

If the Licensee chooses to reanalyze the sample, the same sample shall be submitted for reanalysis at the ITL that provided the initial failed result. If the sample passes all previously failed tests at the original ITL, an additional sample representing the same sample set previously tested shall be submitted to an ITL other than the original ITL for a Second Confirmatory Test. To be considered passing and therefore safe for sale, the sample shall have passed the Second Confirmatory Test at an ITL other than the ITL that provided the initial failed result. Any Marijuana and Marijuana product that fails the Second Confirmatory Test shall not be sold, transferred, or otherwise dispensed to consumers, patients, or Licensees. Any such product is subject to an Order of Destruction to be issued by the Commission at its discretion.

Remediation

If the Licensee chooses to remediate, a new test sample shall be submitted to any licensed ITL, which may include the ITL that provided the initial failed result, for a full-panel test. Any failing Marijuana or Marijuana product may be remediated a maximum of two times. Any Marijuana or Marijuana product that fails any test after the second remediation attempt shall not be sold, transferred, or otherwise dispensed to consumers, patients, or Licensees. Any such product is subject to an Order of Destruction to be issued by the Commission at its discretion.

Destruction

If the Licensee chooses to destroy the failed Marijuana and Marijuana product it shall do so in accordance with 935 CMR 500.105(12) and 935 CMR 501.105(12). Licensees are required under 935 CMR 500.160(4) and 935 CMR 501.160(4) to "have a written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols." The analytical results provided by the ITLs, including those for finished Marijuana and Marijuana products discussed in this protocol, will be a primary means for Licensees to ensure compliance with this requirement.

- The ITL results must include, at a minimum, the following in the laboratory data package:
- Case Narrative:
 - The narrative, written on laboratory letterhead, shall describe any sample receipt, preparation, or analytical issues encountered as well as any method non-



- conformance or exceedance of QA/QC criteria used by the laboratory.
- The narrative shall identify the preparation and analytical methods utilized by the laboratory.
- The narrative shall include a signed statement by an authorized laboratory representative as to the accuracy, completeness, and compliance with the methods of the results presented.
- Chains-of-custody (COC) information or other paperwork indicating requested analyses and documentation of sample collection and receipt.
- Summary of analytical results including sample identifier, methods performed, target analytes analyzed for, result or reporting limit, proper qualifier according to laboratory standard procedures, units of measure, preparation date(s), where applicable, and analysis date(s).

It is highly recommended that the laboratory data package also includes sufficient data to evaluate the laboratory results, including a summary of laboratory QA/QC results. The type of applicable QA/QC results differ by analysis method, but can include surrogates or deuterated monitoring compounds, laboratory QC samples such as spikes, blanks, and duplicates, and calibration summaries. It is the responsibility of the Licensee to provide information sufficient to demonstrate that the results are accurate and precise, and in line with method capabilities and project data quality objectives (DQOs).

Depending on the outcome of the analysis, the Licensee may need to take action to address unacceptable levels of contamination or to perform follow-up investigation. [Exhibit 8](#) is a flowchart Licensees should use to determine the correct course of action in response to each laboratory analytical data package. As discussed above, if any analysis fails to meet all applicable DQOs, then the finished Marijuana product or MIP cannot be dispensed. In this case, the production batch may be resampled for follow-up testing. A production batch may be retested once and records of the original analysis must be retained. If applicable DQOs are not met, the production batch cannot be dispensed or sold to consumers or patients or used in the production of MIPs.

If a batch of finished plant material fails to meet a metal or a bacteria/fungi/mycotoxin standard described in Exhibits 4 and 6, the finished plant material cannot be dispensed or sold to a patient or consumer as finished Marijuana without first being reanalyzed and/or remediated pursuant to 935 CMR 500.160(13) or 935 CMR 501.160(12). Finished plant material that fails to meet a metal, or a bacteria/fungi/mycotoxin standard may be used to derive other finished Marijuana products (e.g., resins, concentrates). While the finished plant material or finished Marijuana product may be treated in a manner to reduce the concentration of metals or bacteria/fungi/mycotoxin contaminants, the finished plant material or finished Marijuana product may not be treated to bind or restrict the availability of the metals or bacteria/fungi/mycotoxin in an analysis without reducing the total contaminant content.

If a batch of finished plant material fails to meet a pesticide residue and plant growth regulator



limit described in Exhibit 5 and Section 7.3, it cannot be dispensed to consumers or patients, or used to derive other products. Marijuana and Marijuana products that fail for pesticides or plant growth regulators may not be remediated and the associated batch will be subject to an Order of Destruction issued by the Commission at its discretion.

If a concentrate or resin exceeds the residual solvent requirements described in Exhibit 7 and Section 7.5 it cannot be dispensed to consumers or patients without first being reanalyzed and/or remediated pursuant to 935 CMR 500.160(12) and/or 935 CMR 501.160(11). If upon reanalysis and/or remediation the concentrate/resin meets the residual solvent standard, the ultimate finished Marijuana product may be dispensed to consumers and patients as long as all applicable limits are met.

As required by 935 CMR 500.160(5) and 935 CMR 501.160(5), the Licensee must maintain the results of all testing for no less than one year. These records must be available for inspection by the Commission upon request.



9.0 References

AHP. 2013. Cannabis Inflorescence, Cannabis spp., Standards of Identity, Analysis, and Quality Control. American Herbal Pharmacopoeia. 2013. Available at: <https://herbal-ahp.org/online-ordering-cannabis-inflorescence-qc-monograph/>

Colorado Pot Guide. 2014. “Different types of Marijuana concentrates available in Colorado,” Website: Colorado Pot Guide, February 6, 2014. Available at: <https://potguide.com/blog/2014/february/06/different-types-of-marijuana-concentrates-available-in-colorado/>

Colorado Department of Revenue. 2015. “Marijuana Equivalency in Portion and Dosage”. August 10, 2015. Available at: https://www.colorado.gov/pacific/sites/default/files/MED%20Equivalency_Final%2008102015.pdf

FDA. 2011. Analysis of Foods for As, Cd, Cr, Hg and Pb by Inductively Coupled Plasma-Mass Spectrometry (ICP-MS). United States Food and Drug Administration, Center for Food Safety and Applied Nutrition, Current Method CFSAN/ORS/DBC/CHCB April 25, 2011.

Mechtler, K., Bailer, J., and de Hueber, K. 2004. Variations of Δ^9 -THC Content in Single Plants of Hemp Varieties. *Industrial Crops and Products*. 19 (1): 19-24.

Sexton, M. and Ziskind, J. 2013. Sampling Cannabis for Analytical Purposes. BOTEC Analysis Corp. I-502 Project #430-1e.

USDA. 2014. National Organic Program Handbook: Guidance and Instructions for Accredited Certifying Agents and Certified Operations, U.S. Department of Agriculture, National Organic Program. Available at: <https://www.ams.usda.gov/rules-regulations/organic/handbook>

USDA. 2013. “Periodic Residue Testing of Organic Products,” memorandum from Miles McElvoy, Deputy Administrator, U.S. Department of Agriculture, National Organic Program, to National Organic Program Accredited Certifying Agents, February 28, 2013. Available at: <https://www.ams.usda.gov/sites/default/files/media/NOP-Notice-ResidueTesting.pdf>

USDA. 2012a. “Laboratory Selection Criteria for Pesticide Residue Testing,” Document NOP 2611 of “National Organic Program Handbook: Guidance and Instructions for Accredited Certifying Agents and Certified Operations.” U.S. Department of Agriculture, National Organic Program, Effective November 8, 2012. Available at: <https://www.ams.usda.gov/sites/default/files/media/2611.pdf>

USDA. 2012b. 2010—2011 Pilot Study Pesticide Residue Testing of Organic Produce. U.S.



Department of Agriculture, National Organic Program and National Science and Technology Programs. November 2012. Available at: <https://www.ams.usda.gov/reports/2010-2011-pilot-study-pesticide-residue-testing-organic-produce>

USDA. 2011. “Prohibited Pesticides for NOP Residue Testing,” Document NOP 2611-1 of “National Organic Program Handbook: Guidance and Instructions for Accredited Certifying Agents and Certified Operations.” U.S. Department of Agriculture, National Organic Program, Effective July 22, 2011. Available at: <http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5088987>

U.S. FDA. 1999. Pesticide Analytical Manual, Volume I: Multiresidue Methods (3rd ed., updated October 1999). Center for Food Safety and Applied Nutrition, Office of Plant, Dairy Foods, and Beverages. Available at: <http://www.fda.gov/Food/FoodScienceResearch/LaboratoryMethods/ucm2006955.htm>

United States Pharmacopeia. 2008. “Microbiological Examination of Nonsterile Products: Microbial Enumeration Tests.” USP 31, Chapter <61>.

United States Pharmacopeia. 2008. “Microbiological Examination of Nonsterile Products: Tests for specified Microorganisms.” USP 31, Chapter <62>. Available at: <https://www.usp.org/frequently-asked-questions/microbial-enumeration-nonsterile-products-tests-specified-microorganisms>

United States Pharmacopeia. 2015. General Chapter <232> Elemental Impurities – Limits: To be Published in 2nd Supplement of USP 38-NF 33. April 17, 2015. Available at: <https://www.usp.org/sites/default/files/usp/document/our-work/chemical-medicines/key-issues/232-40-35-1s.pdf>

United States Pharmacopeia. General Chapter <232> Elemental Contamination in Dietary Supplements. Available at: <https://www.usp.org/sites/default/files/usp/document/our-work/chemical-medicines/key-issues/ei-implementation-faq-2015-03-27.pdf>

United States Pharmacopeia. 2015. “Elemental Impurities -- Procedures.” USP 36, Chapter <233>. April 17, 2015. Available at: <https://www.usp.org/sites/default/files/usp/document/our-work/chemical-medicines/key-issues/c233.pdf>

United States Pharmacopeia. Undated-a. “Residual Solvents.” First Supplement to USP 36–NF 31, Chapter <467>. Available at: <https://www.usp.org/frequently-asked-questions/residual-solvents>

United States Pharmacopeia. 2008. “Microbial Examination of Nonsterile Products: Acceptance Criteria for Pharmaceutical Use.” USP 31, Chapter <1111>.



Available at:

[https://www.drugfuture.com/Pharmacopoeia/USP32/pub/data/v32270/usp32nf27s0_c1111h.html#:~:text=1111 microbiological examination of nonsterile products: acceptance criteria, to adversely affect the health of the patient.](https://www.drugfuture.com/Pharmacopoeia/USP32/pub/data/v32270/usp32nf27s0_c1111h.html#:~:text=1111%20microbiological%20examination%20of%20nonsterile%20products%3A%20acceptance%20criteria,%20adversely%20affect%20the%20health%20of%20the%20patient.)

United States Pharmacopeia. Undated-b. "Articles of Botanical Origin." USP 36, chapter <561>. Available at: <https://www.usp.org/sites/default/files/usp/document/our-work/DS/2015-dsc-chapters-561-616-1010-1092.pdf>

WHO. 2005. Annex 4: WHO Guidelines for sampling of pharmaceutical products and related materials. WHO Technical Report Series, No. 929. World Health Organization, Geneva, Switzerland.

WHO. 2007. WHO Guidelines for Assessing Quality of Herbal Medicines with Reference to Contaminants and Residues. World Health Organization, Geneva, Switzerland. Available at: https://apps.who.int/iris/bitstream/handle/10665/43510/9789241594448_eng.pdf?sequence=1&isAllowed=y





News / Bulletin | Duplicate Sampling | November 6, 2024

Bulletin | Duplicate Sampling | November 6, 2024

To: Licensees (Marijuana Establishments, Medical Marijuana Treatment Centers)
From: Investigations and Enforcement Department
Date: November 6, 2024
Subject: Bulletin – Duplicate Sampling

The Cannabis Control Commission (“Commission”) issues this bulletin to all Marijuana Establishments and Medical Marijuana Treatment Centers (collectively, “Licensees”).

This bulletin is intended to serve as a reminder of Licensees obligation to collect and submit duplicate samples for testing in accordance with Section 5.4 of the **Protocol for the Sampling and Analysis of Finished Marijuana Products and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers, and Colocated Marijuana Operations**.

Duplicate samples are collected to provide verification of representative sampling and laboratory procedures. As such, Licensees must adhere to the following processes:

- Licensees must collect a duplicate sample for 5 percent—one out of every 20—of the representative samples collected for each Marijuana product type.
- Duplicate samples must be taken on the same day from the same product batch.
- Licensees must not identify the samples as duplicates to the Independent Testing Laboratory, for purposes of blind quality control.

The Commission may periodically review testing results, including duplicate samples, to evaluate any variance in the sampling and analysis procedures. This review may be used to inform future policy development to improve current Protocols or lead to enforcement action in instances of noncompliance.

Questions?

If you have additional questions, please contact the Commission at (774) 415-0200 or Testing@CCCMass.com.

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Cannabis Control Commission

Public Meeting

March 13, 2025 at 10:00 am
Hybrid via Microsoft Teams



Agenda

1. Call to Order
2. Commissioner Comments and Updates
3. Minutes
4. Executive Director and Commission Staff Report
5. Staff Recommendations on Renewal Licenses
6. Staff Recommendations on Provisional Licenses
7. Staff Recommendations on Final Licenses
8. Staff Recommendations on Responsible Vendor Training Renewals
9. Commission Discussion and Votes
10. Executive Session
11. New Business Not Anticipated at Time of Posting
12. Next Meeting Date
13. Adjournment



Executive Director and Commission Staff Report



Executive Director Onboarding

March 13, 2025

Onboarding – First Two Weeks

- **Week 1 (Week of March 3rd): Onboarding**
 - Meeting with All Staff & Commissioners on March 4 (Hybrid)
 - Meeting(s) with All-Chiefs (In-Person) & Commissioners
 - Programmatic Reviews from Chiefs & Directors Completed
 - Medical Program & Constituent Services
 - Legal Orientation
 - IT Infrastructure & Strategy
 - Investigations & Enforcement (Licensing & Testing)
 - Communications & Media / Digital & Creative Services / Social Equity Program / Government Affairs
 - Human Resources & DEIJB
 - Finance – Accounting & Budgeting (FY25/26)
 - Visit to Stem Haverhill on Friday, March 7
 - CCC Team with Licensee, Municipal Officials, State Senator and Representative



Onboarding – First Two Weeks

- **Week 2 (Week of March 10th):**
 - Budget Presentation to Joint Committee on Ways & Means (JWM) on Monday, March 10
 - Video available online (great Q&A from Committee Members)
 - Sunset of June 13, 2024 Motion to Delegate Certain Responsibilities to Chiefs/Directors
 - Sunset as of onboarding of Executive Director, per original motion
 - Public Meeting, March 13th
- **Next Steps:**
 - Visit Boston Office, timed with outreach to appointing authorities, legislative contacts, and state agencies for meet/greet, relationship building, and future collaboration
 - Continued meetings with all Directors, Managers, Staff





Licensing Data Updates

Highlights from Licensing Data

- 1 application awaiting first review
- 7 applications awaiting supplemental review
- 1 application for Provisional License consideration
- 3 licensees for Final License consideration
- 82,083 certified active patients



Licensing Applications | March 13, 2025

The totals below are number of approvals by stage.

Type	#
Pre-Certified/Delivery Endorsed Microbusiness	225
Provisionally Approved	128
Provisional License	490
Final License	49
Commence Operations	725
Total	1,617

➔ + 13.8%

* Note: This represents the percent increase since March 2024.

Provisionally approved means approved by the Commission but has not submitted license fee payment yet – provisional license has not started



Licensing Applications | March 13, 2025

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Craft Marijuana Cooperative	2	N/A	0	0	4	0	0	6
Marijuana Courier License	12	N/A	0	4	12	3	10	41
Marijuana Courier Pre-Certification	18	105	0	N/A	N/A	N/A	N/A	123
Independent Testing Laboratory	1	N/A	0	2	2	0	16	21
Marijuana Cultivator	45	N/A	2	41	189	14	144	435
Marijuana Delivery Operator License	11	N/A	0	6	19	0	18	54
Marijuana Delivery Operator Pre-Certification	12	115	0	N/A	N/A	N/A	N/A	127
Marijuana Microbusiness	5	N/A	0	4	17	1	14	37
Marijuana Product Manufacturer	37	N/A	1	40	132	20	119	349
Marijuana Research Facility	6	N/A	0	1	0	1	0	8
Marijuana Retailer	58	N/A	2	31	111	11	393	606
Marijuana Transporter with Other Existing ME License	3	N/A	0	2	4	0	4	14
Microbusiness Delivery Endorsement	1	5	0	0	0	0	2	8
Third Party Transporter	9	N/A	0	0	0	0	5	14
Standards Laboratory	0	N/A	0	0	0	0	0	0
Total	220	225	5	128	490	49	725	1,842



Cultivation Applications (Active Only) | March 13, 2025

Type	Pending Application	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Microbusiness w/ Tier 1 Cultivation (up to 5,000 sq. Ft.)	0	0	0	16	1	11	28
Cultivation Tier 1 (Up to 5,000 sq. ft.)	0	0	0	12	5	20	37
Cultivation Tier 2 (5,001-10,000 sq. ft.)	0	0	0	25	2	35	62
Cultivation Tier 3 (10,001-20,000 sq. ft.)	0	0	0	13	1	30	44
Cultivation Tier 4 (20,001-30,000 sq. ft.)	0	0	0	5	2	9	16
Cultivation Tier 5 (30,001-40,000 sq. ft.)	0	0	0	0	0	10	10
Cultivation Tier 6 (40,001-50,000 sq. ft.)	0	0	0	3	0	9	12
Cultivation Tier 7 (50,001-60,000 sq. ft.)	0	0	0	1	0	2	3
Cultivation Tier 8 (60,001-70,000 sq. ft.)	0	0	0	0	0	3	3
Cultivation Tier 9 (70,001-80,000 sq. ft.)	0	0	0	1	0	0	1
Cultivation Tier 10 (80,001-90,000 sq. ft.)	0	0	0	0	0	6	6
Cultivation Tier 11 (90,001-100,000 sq. ft.)	0	0	0	3	0	6	9
Total	N/A	N/A	N/A	79	11	141	231
Total Maximum Canopy (Sq. Ft.)	N/A	N/A	N/A	1,390,000	130,000	3,695,000	5,215,000

+61.9%

+6.9%

* Note: percentage is of Total, Active Cultivation commence operations licenses



Cultivation Applications (Active Only) | March 13, 2025

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Marijuana Cultivator (Indoor)	N/A	N/A	N/A	N/A	59	10	109	177
Marijuana Cultivator (Outdoor)	N/A	N/A	N/A	N/A	4	0	21	26
Total	N/A	N/A	N/A	N/A	63	10	130	203



Cultivation Applications Commence Ops 2022-2025 | March 13, 2025

Tier	FY22	FY23	FY24	FY25
1 (Up to 5,000 sq. ft.)	13	18	23	25
2 (5,001-10,000 sq. ft.)	20	25	33	32
3 (10,001-20,000 sq. ft.)	11	18	21	31
4 (20,001-30,000 sq. ft.)	7	9	12	14
5 (30,001-40,000 sq. ft.)	7	8	10	10
6 (40,001-50,000 sq. ft.)	3	6	6	8
7 (50,001-60,000 sq. ft.)	3	4	4	3
8 (60,001-70,000 sq. ft.)	1	2	2	34
9 (70,001-80,000 sq. ft.)	2	2	2	42
10 (80,001-90,000 sq. ft.)	4	6	6	26
11 (90,001-100,000 sq. ft.)	5	6	8	9
Total	76	104	127	144
Total Maximum Canopy	2,395,000 (sq. ft.)	3,270,000 (sq. ft.)	3,830,000 (sq. ft.)	4,415,000 (sq. ft.)



Host Community Agreements Data | March 13, 2025

Overview	Total	SEP & EEA	DBE
The total number of applications received since March 1, 2024, containing an HCA	885	146	96
Number of Model HCAs received	233	23	28
Compliant Model HCAs	226	23	28
Number of Model HCA Waivers received	95	18	9
Compliant HCAs	626	103	65
Non-Compliant HCAs	205	33	21

130 Towns with Compliant HCAs

Abington, Adams, Amesbury, Ashburnham, Ashby, Athol, Attleboro, Avon, Ayer, Barre, Belmont, Berkley, Bernardston, Beverly, Blackstone, Bolton, Boston, Bridgewater, Brimfield, Brockton, Brookfield, Brookline, Cambridge, Charlton, Chelsea, Cheshire, Chicopee, Clinton, Colrain, Cummington, Danvers, Dartmouth, Deerfield, Douglas, Dracut, Eastham, Easthampton, Egremont, Fairhaven, Fall River, Fitchburg, Framingham, Franklin, Gardner, Gill, Gloucester, Grafton, Great Barrington, Greenfield, Groton, Hadley, Halifax, Hanson, Hatfield, Haverhill, Holliston, Holyoke, Hopedale, Hudson, Hull, Lee, Littleton, Lowell, Lynn, Mansfield, Marblehead, Marlborough, Marshfield, Mashpee, Maynard, Medford, Medway, Melrose, Mendon, Merrimac, Middleborough, Milford, Millbury, Monson, Montague, Natick, New Bedford, Newton, North Adams, North Brookfield, Northampton, Norton, Norwood, Orange, Orleans, Palmer, Pittsfield, Plainfield, Plymouth, Quincy, Rehoboth, Rockland, Royalston, Rutland, Salem, Sandisfield, Sharon, Sheffield, Shrewsbury, Somerville, Southwick, Springfield, Sterling, Sturbridge, Sunderland, Swansea, Taunton, Templeton, Tewksbury, Tyngsborough, Wakefield, Ware, Wareham, Webster, Wellfleet, West Springfield, West Tisbury, Westfield, Whately, Whitman, Williamstown, Winchendon, Woburn, Worcester.



Host Community Agreements Data | March 13, 2025

HCA Review Status	Total
Number of HCAs reviewed	858
Number of HCAs currently under review	19
Number of Host Community Agreement Determination Notices sent out	649

Extensions	Total
Extension requests received	1,420
Extension requests that received conditional pre-approval	111
Extension requests granted	1,337
Average number of days requested	86



Workforce Report . Welcome to Our Team!

DIVISION DEPARTMENT	TEAM MEMBERS AND JOB ROLES
Information Technology & Innovation	Zachary Preville IT Support Analyst 1/27/2025 Nearly 4 years experience supporting a <i>nationwide</i> network encompassing 1600 locations.
Investigation & Enforcement	Timothy Barwise Interim Director, Testing B.S. Natural Resources Conservation, University of MA, Amherst NCIT Certified Investigator
Executive Offices	Travis Ahern Executive Director Northeastern University Masters (MA) in Public Administration Hobart College Bachelor of Arts (BA) in Political Science



Workforce Report – Recruitment Update – Current

OPEN POSITIONS	<u>I</u> = Interviewing <u>OP</u> = Offer Pending <u>P</u> = Posted <u>RR</u> – Resumes in Review
2025 IN RECRUIT	<ul style="list-style-type: none">▪ 2 - Associate Enforcement Counsel – On-Boarding – 3/24/2025▪ Associate General Counsel – Resumes in Review▪ 4 - Investigator(s) – Interviewing▪ Fiscal Specialist x 2: 1 - Offer Pending; 1 - Interviewing▪ Licensing Specialist – Offer Pending▪ <u>INTERNAL PROMOTIONAL OPPORTUNITIES</u><ul style="list-style-type: none">Director of Enforcement Training – Offer Pending1st EC – Offer PendingLicensing Manager - Posted



Workforce Report – 2024 Employee Demographics

ETHNICITY	2024 TOTAL EMPLOYEE POPULATION = 128/139
ASIAN	8%
BLACK/AFRICAN AMERICAN	26%
HISPANIC	6%
UNSPECIFIED	3%
WHITE	57%
FEMALES	53%
MALES	45%
UNSPECIFIED	2%
2024 TURNOVER RATE	12%



Workforce Report – Exit Interviews

2024

EXIT REASONS CITED

SAMPLE SIZE = 14

**TURNOVER RATE
12%**



Workforce Report – Exit Interviews

2024

LEAST LIKEABLE EXPERIENCE AT THE COMMISSION

SAMPLE SIZE = 14

TURNOVER RATE

12%



Workforce Report – Exit Interviews

2023

EXIT REASONS CITED

SAMPLE SIZE = 16

TURNOVER RATE

14%

Exit Reasons



#/% Respondents = 7/44%



Workforce Report – Exit Interviews

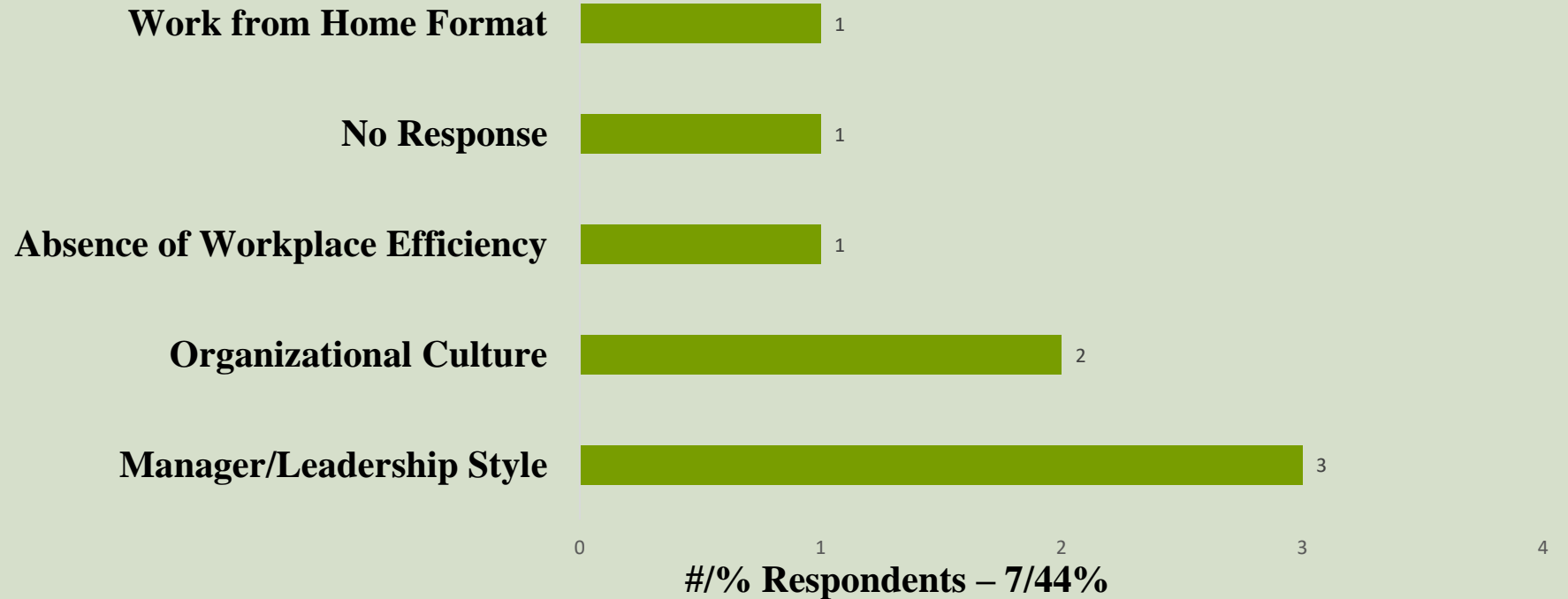
2023

LEAST LIKEABLE EXPERIENCE AT THE COMMISSION

SAMPLE SIZE = 16

TURNOVER RATE

14%



Workforce Report – Exit Interviews

2025	CANNABIS CONTROL COMMISSION – DEIJB STATEMENT
<p>CCC’s COMMITMENT to DIVERSITY</p> <p>DEIJB – Diversity, Equity, Inclusion, Justice, and Belonging</p>	<p>The Cannabis Control Commission is committed to the principles of Diversity, Equity, Inclusion, Social Justice, and Belonging. The Commission strives to create and sustain a diverse, equitable, and inclusive workplace, and supports all staff and employees with resources, tools and professional development to uphold the equity mandates of the Commission.</p>



Workforce Report – Exit Interviews

2025	CANNABIS CONTROL COMMISSION – DEIJB INITIATIVES
<p>2025 DIVERSITY INITIATIVES</p> <p>DEIJB – Diversity, Equity, Inclusion, Justice, and Belonging</p>	<p>Employee Engagement:</p> <ul style="list-style-type: none">• Employee Resource Groups: DEIJB Employee Resource Group (Culture and Community) and DEIB Committee• DEI Communications: DEIJB Dispatch; Conversation Hours <p>Trainings and Professional Development:</p> <ul style="list-style-type: none">• Annual DEIJB Staff Trainings;• Quarterly Professional Development Workshops• DEIJB Tools and Resource Library <p>Workplace Policies and Practices:</p> <ul style="list-style-type: none">• HR Policies and Practices; DEIJB Policy <p>Advise and Support:</p> <ul style="list-style-type: none">• Leadership DEIJB Steering Committee• Equity and Inclusion Initiatives Content and Assessment Guidance





Staff Recommendations: Licensing Renewals

Staff Recommendations: Renewals

1. ARL Healthcare Inc. (#MRR207015)
2. Ashli's Extracts, Inc. (#MPR244243)
3. Ashli's Farm, Inc. (#MCR140818)
4. Ashli's, Inc. (#MRR207027)
5. Baked Beans Farm LLC (#MPR244189)
6. Beacon Compassion, Inc. (#MRR207219)
7. Berkshire Roots, Inc. (#MXR126678)
8. Berkshire Roots, Inc. (#MCR140901)
9. Berkshire Roots, Inc. (#MPR244314)
10. Buudda Brothers LLC (#MCR140750)
11. Buudda Brothers LLC (#MPR244194)
12. CannaVanna, Inc. (#MRR207148)
13. CommCan, Inc. (#MRR206877)
14. Coyote Cannabis Corporation (#MCR140913)
15. Coyote Cannabis Corporation (#MPR244316)
16. Elevated Roots II LLC (#MRR206913)
17. Elevated Roots, LLC (#MRR206907)
18. ELEVATION RETAIL II LLC (#MRR207116)
19. FFD Enterprises MA (#MRR206977)
20. Gan Or LLC (#MDR272573)
21. Gan Or LLC (#MPR244211)
22. Gas Bus LLC (#MDR272579)
23. Green Era LLC (#MRR207080)
24. Greenjeans Farms, LLC (#COR129715)



Staff Recommendations: Renewals

25. GTE Taunton LLC (#MRR207191)
26. Holistic Health Group Inc. (#MRR207004)
27. Holistic Industries, Inc. (#MRR207213)
28. JMK Gardening, LLC DBA Wonderland-Cannabis Co (#MRR207161)
29. Leaf Lux Group Inc. (#MRR207082)
30. New Dia, LLC (#MRR207136)
31. Pudding Hill Farm LLC (#MCR140863)
32. Resinate, Inc. (#MRR207151)
33. Rooted In, LLC (#MRR207206)
34. Sanctuary Medicinals, Inc. (#MPR244300)
35. Slang, Inc. (#MRR207147)
36. Solar Therapeutics, Inc. (#MRR206955)
37. Sweetgrass Botanicals Extractions LLC (#MPR244207)
38. Sweetgrass Botanicals LLC (#MRR206965)
39. T. Bear Inc. (#MPR244277)
40. The Heirloom Collective, Inc. (#MRR207214)
41. True East Leaf LLC (#MCR140756)
42. True East Leaf LLC (#MRR206950)
43. Western Front, LLC (#MRR207125)
44. Alternative Compassion Services, Inc. (#RMD3320)
45. Green Gold Group, Inc. (#RMD786)





Staff Recommendations: Provisional Licensure

Staff Recommendations: Provisional Licenses

1. Ember Gardens Boston, LLC (#MRN284206), Marijuana Retailer





Staff Recommendations: Final Licensure

Staff Recommendations: Final Licenses

1. Haze of Grafton, LLC (#MR282399), Marijuana Retailer
2. Lazy River Products – Tewksbury, LLC (#MR284805), Marijuana Retailer
3. Richards Flowers, LLC (#MB282225), Marijuana Microbusiness
4. Green Gold Group, Inc. (#RMD4217-R), Medical Marijuana Treatment Center





Staff Recommendations: Responsible Vendor Training Renewal Licenses

Staff Recommendations: Responsible Vendor Training Renewal

1. 420 Trainers LLC (#RVR453152)





Commission Discussion & Votes

Commission Discussion and Votes

1. Delivery Exclusivity Working Group Recommendation





Delivery Exclusivity Working Group Recommendation

Michael Baker, Deputy General Counsel

Working Group Overview

Purpose of Working Group

The Working Group is charged with collecting required data under 935 CMR 500.050 (10)(b) and is further charged with developing recommendations for the Commission's consideration regarding whether to extend the exclusivity period.

Timeframe

Launched on April 4, 2024, the Delivery Exclusivity Working Group was initiated under the leadership of Commissioner Ava Concepcion, with Silea Williams, Director of Equity Programming and Community Outreach as the Project Lead.



Working Group: Overview of Work

The working group was tasked with the following: |

- **Reviewing Regulatory & Economic Factors:** Analyzing state regulations, business feasibility, and competitive market conditions to assess whether adjustments to the exclusivity period would enhance long-term viability for delivery licensees.
- **Analyzing Market Performance & Licensing Data:** Conducting a comprehensive assessment of delivery license issuance, business activity, and revenue trends during the exclusivity period, leveraging quantitative metrics such as delivery license approvals, active operators, consumer adoption rates, and revenue growth to evaluate the effectiveness of the exclusivity model and inform data-driven recommendations.
- **Gathering Stakeholder & Industry Feedback:** Engaging with licensees, regulators, and industry experts through surveys, focus groups, and public forums to understand challenges, opportunities, and best practices related to delivery exclusivity.
- **Developing Policy Recommendations:** Synthesizing findings into actionable recommendations for Commission review additional support mechanisms, and strategies to promote a more sustainable delivery marketplace.
- **Evaluating the Impact of the Exclusivity Period:** Conducting data analysis and industry assessments to determine how the exclusivity period has influenced market participation, business sustainability, and equitable access for delivery operators.



Regulations Regarding Delivery Exclusivity

935 CMR 500.050(10)(b) and 935 CMR 500.050(11)(f):

Delivery Courier/Delivery Operator Licenses shall be limited on an exclusive basis to businesses controlled by and with majority ownership comprised of Economic Empowerment Priority Applicants or Social Equity Program Participants for a period of 36 months from the date the first Delivery Operator Licensee receives a notice to commence operations; provided, however, that the Commission may vote to extend that period following a determination that the goal of the exclusivity period to promote and encourage full participation in the regulated Marijuana industry by people from communities that have previously been disproportionately harmed by Marijuana prohibition and enforcement of the law has not been met; and the Commission may vote to expand eligibility for Delivery Licenses during the exclusivity period pursuant to 935 CMR 500.050(10)(b)4./935 CMR 500.050(11)(f)4.

935 CMR 500.050(5)(e):

Delivery Endorsements shall be subject to the exclusivity provisions for Delivery Licensees established in 935 CMR 500.050(10)(b).



Regulations Regarding Delivery Exclusivity (con't.)

935 CMR 500.050(10)(b) and 935 CMR 500.050(11)(f):

2. The Commission shall collect and report on data measuring the criteria throughout the exclusivity period. The Commission shall begin evaluating whether the goals of the exclusivity period have been met at least eight months before the end of the 36-month period to provide adequate time to consider whether an extension of the 36-month period is necessary prior to the conclusion of that time period.

3. The licenses shall generally be available to applicants after the 36-month period *unless the Commissioners affirmatively votes to extend the period of exclusivity by a period of 12 months after the first 36-month period*. Any subsequent extension of the exclusivity period would require the Commission affirmatively to find that the goals and objectives of the exclusivity period have not been met.



Recommendation: 12 Month Extension

Additional time is recommended to incorporate the following into the report:

- 1) Understand the impact on the industry from the changes to the delivery licenses (e.g. 2 to 1 agents in a vehicle, expanded delivery hours, digitalization of records);
- 2) Examine the effect of the ongoing implementation of the HCA statutory and regulatory amendments.
- 3) Examine the effect of cities' and towns' bylaws/ordinances derived from Chapter 180 and the corresponding Municipal Equity regulations;
- 4) Assess the impact of the creation of the Cannabis Social Equity Trust Fund on Marijuana Establishments;
- 5) Collect additional data as requested by the Commission; and
- 6) Incorporate Delivery Exclusivity into regulations before April 2026.



Potential Delivery Exclusivity Timeline*

**If the board votes to extend for an additional 12 months.*

March 13, 2025

Commissioners vote on 12-month extension.

March-July/August

Working Group continues to collect and analyze data.

By September 11

Working Group presents report to Commissioners at Public Meeting.

By September 11

Commission Votes on the question of whether the goals of the Exclusivity Period have been met.

September-April

- If the Commissioners vote to approve an extended term, the Commission would direct Legal to begin the promulgation process to implement the amendments into Commission regulations.
- If the Commissioners do not vote to approve, the exclusivity period would expire after 12 months and general applicants could apply for delivery licensure.



Recommended Motion Language

1. Move to extend the Delivery Exclusivity period for an additional 12 months as provided under 935 CMR 500.050(10)(b)3. and 935 CMR 500.050(11)(f)3.
2. Move to direct the Executive Director, in consultation with the sponsoring Commissioner, to work with the members of the Delivery Exclusivity Working Group to finalize the report and present the report at public meeting no later than September 11, 2025.



Commission Discussion and Votes

2. Job Description: Data Analyst



Commission Discussion and Votes

3. Tipline Update





Tipline Update

Commissioner Kimberly Roy,
Chief Technology and Innovation Officer Paul Clark,
Chief of Investigations and Enforcement Nomxolisi Jones

Complaint Process Regulation

500.300: Complaints Process

- (1) In a time and manner determined by the Commission, a dedicated telephone number, email address or other means shall be provided for members of the public or Consumers to notify the Commission of complaints regarding Marijuana Establishments, Marijuana Establishment Agents, or Host Communities.
- (2) The Commission may, at its discretion, investigate or decline to investigate any complaint or refer a complaint to another law enforcement or regulatory authority.



Background & Current Process

Input Sources:

- **Investigations Mailbox:** investigations@cccmass.com
- Commission General Mailbox: commission@cccmass.com
- Commission Main Phone Line: 774-415-0200
- Constituent Services Call Center: 833-869-6820
- U.S. Mail



Background & Current Process

Other Sources:

- Commissioners
- Commission Staff (Investigators, Testing Team, Legal, HR, Enforcement Counsel, EPCO)
 - Email
 - Phone
 - In-Person
- Public Meeting Listening Sessions
- Other State Agencies (MDAR, DOR, IG, SAO, AG)
- Media



Background & Current Process

Complaint Handling:

- Each Complaint is Routed to appropriate team based on nature of the complaint by the receiving party
- Currently there is no central tracking, triage, reporting
- Each team has appropriate SOPs for handling, however no single overall SOP across the Commission
- The Inspection Team in 2024 received 303 complaints via email (does not include other sources)
- The Licensing Team received 52 complaints in January 2025
- Chapter 180 introduced need for an additional reporting mechanism for HCA and Municipal Equity complaints



Project Goals

- **Implement a single tips and compliant reporting process through-out the Commission**
 - Single Phone Number
 - Single Email Address
 - Website page outlining Tip & Complaint Process
 - Webform capable of receiving attachments such as documents and photos
 - Central triage, distribution and tracking mechanism
 - Commission-wide SOP for handling
 - Review team specific SOPs for alignment with central SOP
 - Testing
 - Launch

Project Status & Next Steps

Status

- Webform development work is complete, undergoing review this week
- Legal and Communications is reviewing Webform

Next Steps

- Tipline Landing Page to be developed
- Commission SOP and Policies
- Development of Position Description for Complaint Traffic Manager & Approval by Commission
- Complaint Central Tracking Mechanism development
- Testing
- Communications Plan
- Launch



Commission Discussion and Votes

4. Recommendation to Amend Section 5.4 of the Testing Protocol and Amend Administrative Order No. 4 Requiring Licensees to Submit Full Panel Test Sample for Required Compliance Testing



Commission Discussion and Votes

5. Executive Session Minutes

1. September 14, 2023
2. September 29, 2023
3. October 10, 2023
4. October 25, 2023
5. November 1, 2023
6. November 7, 2023
7. November 14, 2023





Commission is in Executive Session



Upcoming Meetings & Adjournment

Upcoming Meetings and Important Dates

Next Meeting Dates

March 27, 2025

Public Meeting
Hyrbid via Teams
10:00 am

Public Meeting dates are tentative and subject to change

2025 Public Meetings*

April 10	September 11
May 8	September 23
May 22	October 9
June 12	October 23
July 10	November 13
August 14	December 11





Additional Licensing Data

Licensing Applications | March 13, 2025

The totals below are all license applications received to date.

Type	#
Pending	220
Withdrawn	1,482
Incomplete	8,390
Denied	5
Approved: Delivery Pre-certifications	220
Approved: Delivery Endorsements	5
Approved: Licenses	1,383
Total	11,705



Licensing Applications | March 13, 2025

The totals below are number of licenses approved by category.

Type	#
Craft Marijuana Cooperative	4
Marijuana Courier	25
Marijuana Delivery Operator	37
Independent Testing Laboratory	20
Marijuana Cultivator	387
Marijuana Microbusiness	36
Marijuana Product Manufacturer	311
Marijuana Research Facility	2
Marijuana Retailer	546
Marijuana Third Party Transporter	5
Marijuana Transporter with Other Existing ME License	10
Total	1,383



Licensing Applications | March 13, 2025

Status	#
Application Submitted: Awaiting Review	1
Application Reviewed: More Information Requested	220
Application Deemed Complete: Awaiting 3rd Party Responses	4
All Information Received: Awaiting Commission Consideration	1
Applications Considered by Commission (includes Delivery Pre-Cert)	1,616
Total	1,842



Licensing Applications | March 13, 2025

The totals below are applications that have submitted all four packets and are pending review.

Type	#
Craft Marijuana Cooperative	2
Delivery-Only Provisional Licensure (Part 2)	12
Delivery-Only Pre-Certification (Part 1)	18
Independent Testing Laboratory	1
Marijuana Cultivator	45
Marijuana Delivery Operator Provisional License (Part 2)	11
Marijuana Delivery Operator Pre-Certification (Part 1)	12
Marijuana Microbusiness	5
Marijuana Product Manufacturer	37
Marijuana Research Facility	6
Marijuana Retailer	58
Marijuana Transporter with Other Existing ME License	3
Microbusiness Delivery Endorsement	1
Third Party Transporter	9
Total	220



Cultivation Applications | March 13, 2025

Type	Pending Application	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Microbusiness w/ Tier 1 Cultivation (up to 5,000 sq. Ft.)	5	0	4	13	1	14	37
Cultivation Tier 1 (Up to 5,000 sq. ft.)	13	0	3	39	5	25	85
Cultivation Tier 2 (5,001-10,000 sq. ft.)	6	0	7	60	3	32	108
Cultivation Tier 3 (10,001-20,000 sq. ft.)	7	2	7	44	1	31	92
Cultivation Tier 4 (20,001-30,000 sq. ft.)	1	0	3	11	2	14	31
Cultivation Tier 5 (30,001-40,000 sq. ft.)	1	0	9	6	1	10	27
Cultivation Tier 6 (40,001-50,000 sq. ft.)	3	0	4	7	0	8	22
Cultivation Tier 7 (50,001-60,000 sq. ft.)	2	0	1	4	1	3	11
Cultivation Tier 8 (60,001-70,000 sq. ft.)	0	0	0	1	0	4	5
Cultivation Tier 9 (70,001-80,000 sq. ft.)	3	0	1	3	0	2	9
Cultivation Tier 10 (80,001-90,000 sq. ft.)	0	0	1	0	0	7	8
Cultivation Tier 11 (90,001-100,000 sq. ft.)	9	0	5	14	0	9	37
Total	50	2	45	202	14	158	472
Total Maximum Canopy (Sq. Ft.)	1,770,000	40,000	1,625,000	4,610,000	240,000	4,505,000	12,790,000

+60.4%

+10.8%

* Note: percentage is of “Total” Cultivation commence operations licenses



Licensing Applications | March 13, 2025

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Marijuana Cultivator (Indoor)	35	N/A	1	36	171	13	119	375
Marijuana Cultivator (Outdoor)	10	N/A	1	5	18	1	25	60
Total	45	N/A	2	41	189	14	144	435



Licensing Applications | March 13, 2025

Of 1,617 applications approved by the Commission, the following applications have Economic Empowerment Priority Review, Social Equity Program Participant, and/or Disadvantaged Business Enterprise status. Please note, applicants may hold one or more statuses. **Please note that the end total represents the total number of applications/licenses at that step in the licensure process.**

Type	Economic Empowerment	Social Equity Program	Disadvantaged Business Enterprise	Total
Pre-Certified/Delivery Endorsed Microbusiness	44	180	30	254
Provisionally Approved	8	16	23	47
Provisional License	30	89	104	223
Final License	4	6	7	15
Commence Operations	31	66	90	185
Total	117	357	253	724

+3.54%

+9.51%

+2.43%

*Note: This represents the increase since March 2024



Licensing Applications | March 13, 2025

The totals below are distinct license numbers that have submitted all required packets.

The 1,842 applications represent 1,056 separate entities

Type	#
MTC Priority	260
Economic Empowerment Priority	137
Expedited Review	706
General Applicant	739
Total	1,842

Type	#
Expedited: License Type	79
Expedited: Social Equity Participant	357
Expedited: Disadvantaged Business Enterprise	179
Expedited: Two or More Categories	91
Total	706



Licensing Applications – EE Only | March 13, 2025

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Craft Marijuana Cooperative	0	N/A	0	0	0	0	0	0
Marijuana Courier License	4	N/A	0	0	4	0	4	12
Marijuana Courier Pre-Certification	3	30	0	N/A	N/A	N/A	N/A	33
Independent Testing Laboratory	0	N/A	0	0	0	0	0	0
Marijuana Cultivator	1	N/A	0	2	6	0	0	9
Marijuana Delivery Operator License	1	N/A	0	0	3	0	3	7
Marijuana Delivery Operator Pre-Certification	1	14	0	N/A	N/A	N/A	N/A	15
Marijuana Microbusiness	0	N/A	0	0	0	0	0	0
Marijuana Product Manufacturer	1	N/A	0	3	3	0	3	10
Marijuana Research Facility	1	N/A	0	0	0	0	0	1
Marijuana Retailer	7	N/A	0	2	13	4	21	47
Marijuana Transporter with Other Existing ME License	0	N/A	0	1	1	0	0	2
Microbusiness Delivery Endorsement	0	0	0	0	0	0	0	0
Third Party Transporter	1	N/A	0	0	0	0	0	1
Standards Laboratory	0	N/A	0	0	0	0	0	0
Total	20	44	0	8	30	4	31	137



Licensing Applications – SEP Only | March 13, 2025

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Craft Marijuana Cooperative	0	N/A	0	0	1	0	0	1
Marijuana Courier License	10	N/A	0	0	8	3	6	27
Marijuana Courier Pre-Certification	15	74	0	N/A	N/A	N/A	N/A	89
Independent Testing Laboratory	0	N/A	0	0	0	0	0	0
Marijuana Cultivator	5	N/A	0	5	21	0	8	39
Marijuana Delivery Operator License	9	N/A	0	0	16	0	16	41
Marijuana Delivery Operator Pre-Certification	10	101	0	N/A	N/A	N/A	N/A	111
Marijuana Microbusiness	2	N/A	0	0	5	0	2	9
Marijuana Product Manufacturer	9	N/A	0	6	17	1	9	41
Marijuana Research Facility	0	N/A	0	0	0	0	0	0
Marijuana Retailer	20	N/A	1	4	20	2	21	68
Marijuana Transporter with Other Existing ME License	1	N/A	0	1	1	0	2	5
Microbusiness Delivery Endorsement	1	5	0	0	0	0	2	8
Third Party Transporter	4	N/A	0	0	0	0	0	4
Standards Laboratory	0	N/A	0	0	0	0	0	0
Total	85	180	1	16	89	6	66	443



Non-Active Licenses By Stage | March 13, 2025

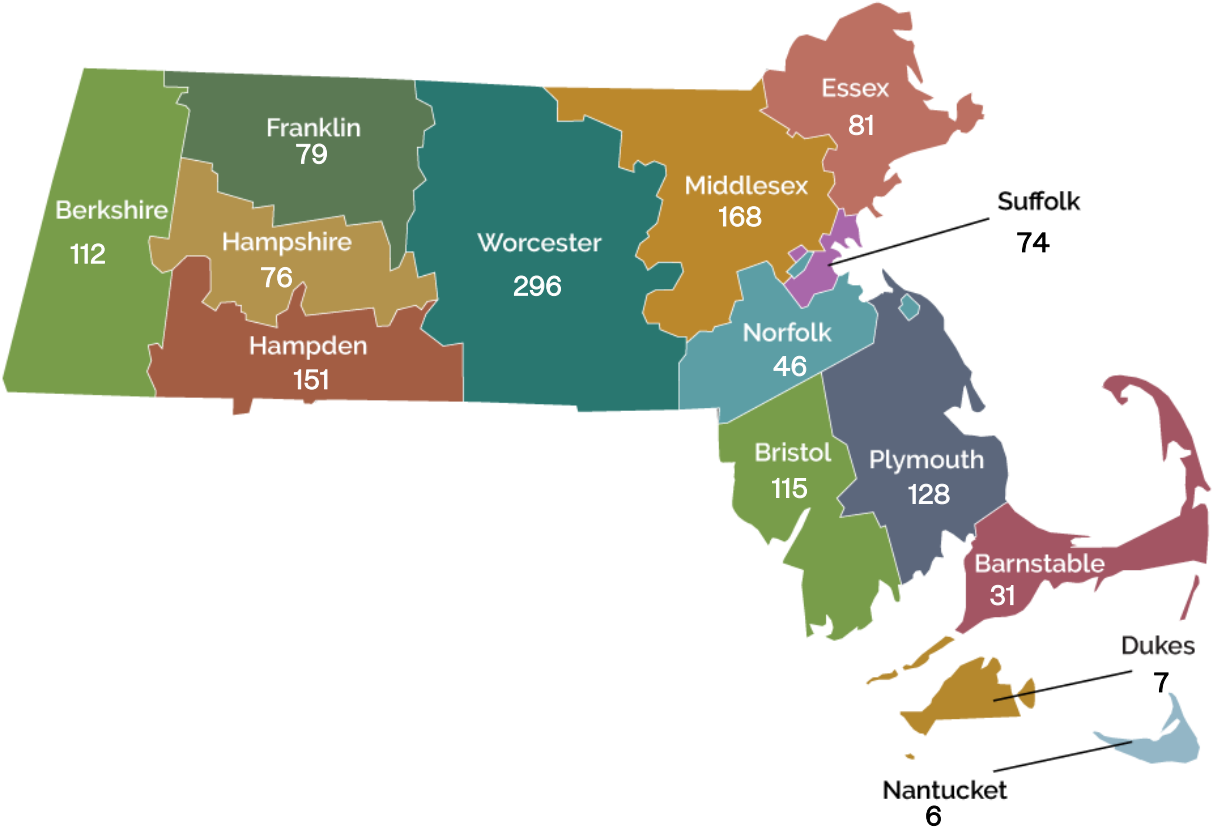
Type	Provisional License	Final License	Commence Operation	Total
Craft Marijuana Cooperative	3	0	0	3
Marijuana Courier License	8	1	4	13
Independent Testing Laboratory	2	0	2	4
Marijuana Cultivator	121	3	18	142
Marijuana Delivery Operator License	12	0	3	15
Marijuana Microbusiness	12	0	2	14
Marijuana Product Manufacturer	80	5	15	100
Marijuana Research Facility	0	0	0	0
Marijuana Retailer	53	1	18	72
Marijuana Transporter with Other Existing ME License	2	0	0	2
Third Party Transporter	0	0	1	1
Standards Laboratory	0	0	0	0
Total	293	10	63	366



Marijuana Establishment Licenses | March 13, 2025

The totals below represent entities in each county that have achieved at least a provisional license

County	#	+/-
Barnstable	31	0
Berkshire	113	1
Bristol	116	0
Dukes	7	0
Essex	82	1
Franklin	79	0
Hampden	152	1
Hampshire	76	0
Middlesex	172	2
Nantucket	6	0
Norfolk	46	0
Plymouth	129	0
Suffolk	77	0
Worcester	297	0
Total	1,383	5

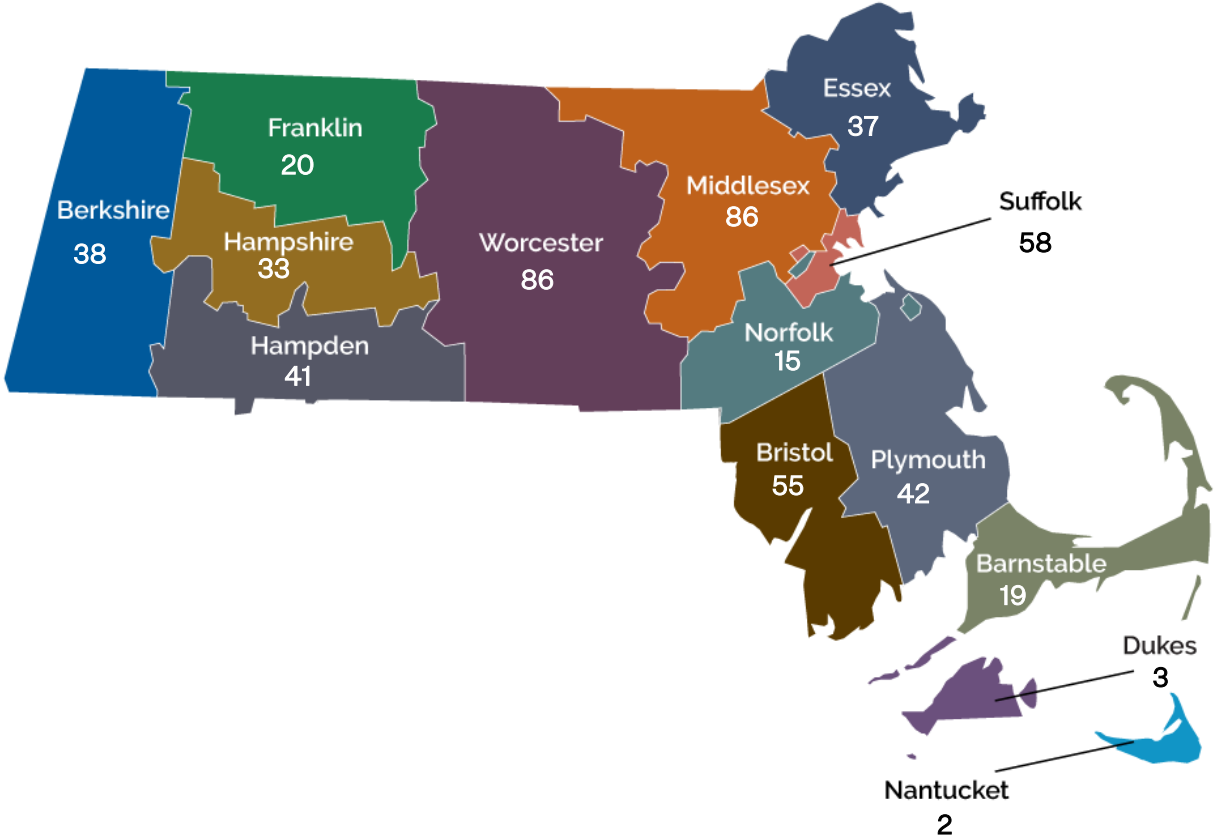


*As of 2/27/25

Marijuana Retailer Licenses | March 13, 2025

The totals below are the total number of retail licenses by county.

County	#	+/-
Barnstable	19	0
Berkshire	39	1
Bristol	56	0
Dukes	3	0
Essex	37	0
Franklin	21	0
Hampden	42	1
Hampshire	33	0
Middlesex	89	2
Nantucket	2	0
Norfolk	15	0
Plymouth	43	0
Suffolk	60	0
Worcester	87	0
Total	546	4

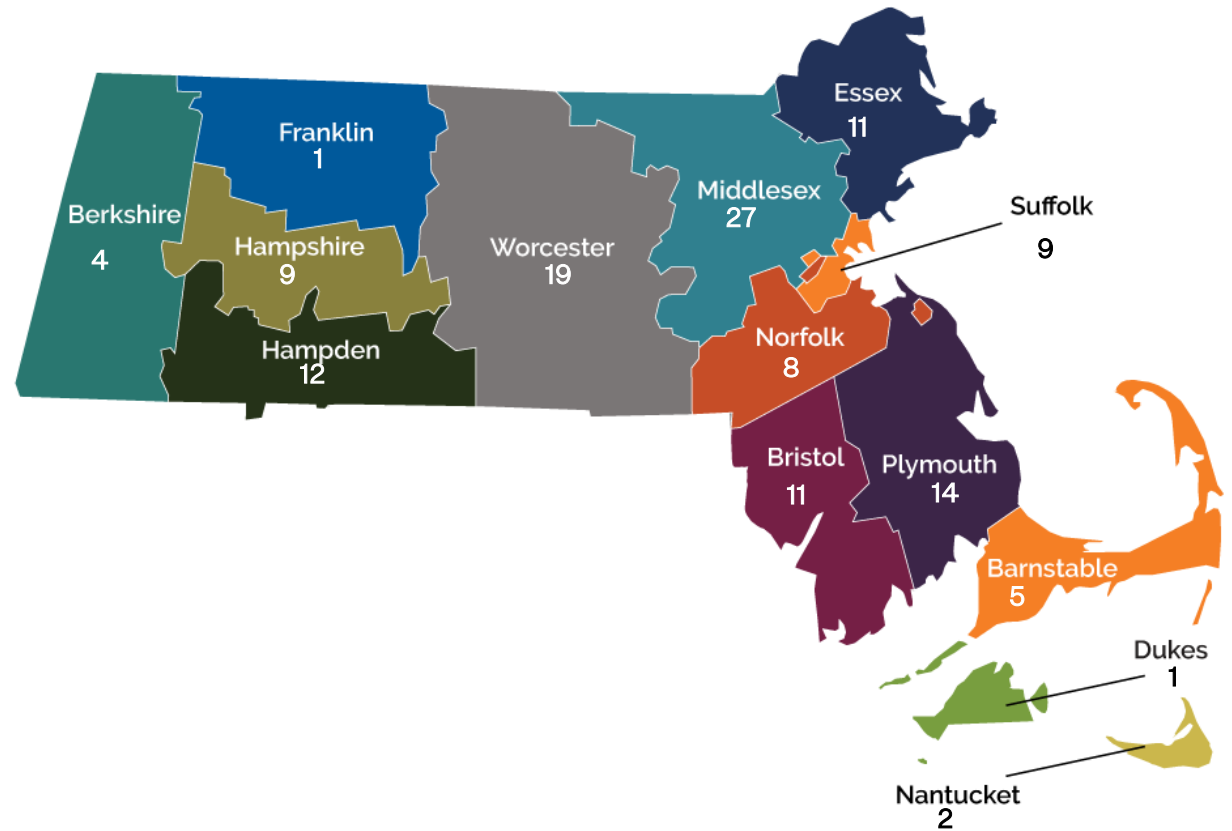


*As of 2/27/25

Medical Marijuana Treatment Center Licenses (Dispensing) March 13, 2025

The totals below are the total number of MTC (Dispensing) licenses by county.

County	#
Barnstable	5
Berkshire	4
Bristol	11
Dukes	1
Essex	11
Franklin	1
Hampden	12
Hampshire	9
Middlesex	27
Nantucket	2
Norfolk	8
Plymouth	14
Suffolk	9
Worcester	19
Total	133



MMJ Licensing and Registration Data | March 13, 2025

The numbers below are a snapshot of the program as of the month of February.

MTC Licenses	#
Provisional	8
Final	1
Commence Operations	97
License Expired	87
Total	193

MMJ Program	#
Certified Patients	86,916
Certified Active Patients	82,083
Active Caregivers	6,091
Registered Certifying Physicians	335
Registered Certifying Nurse Practitioners	124
Registered Physician Assistants	7
Ounces Sold	89,325

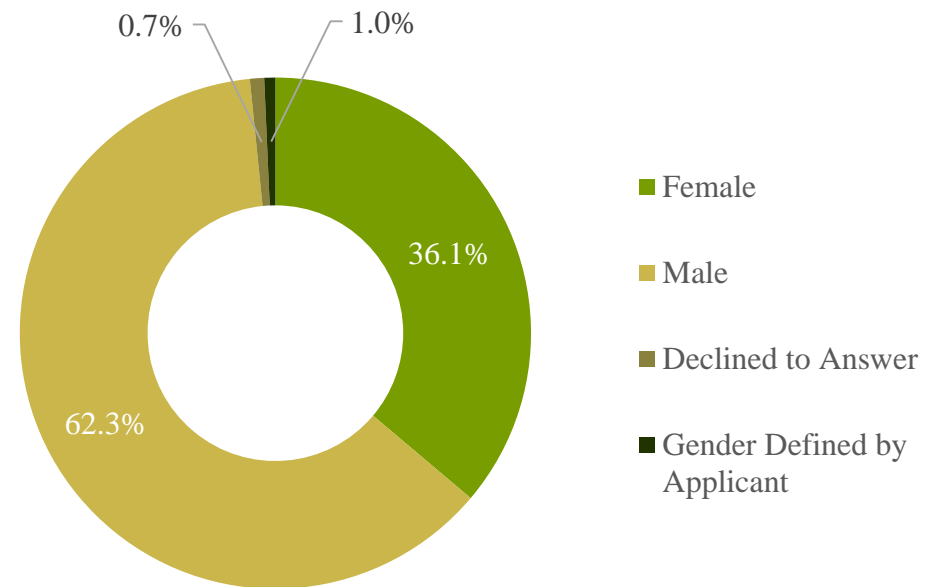


Agent Applications | March 13, 2025

Demographics of Approved and Pending Marijuana Establishment Agents

Gender	#	%
Female	7,920	36.1%
Male	13,671	62.3%
Declined to Answer	217	1.0%
Gender Defined by Applicant	147	0.7%
Total	21,955	100.0%

Gender of Approved and Proposed Agents

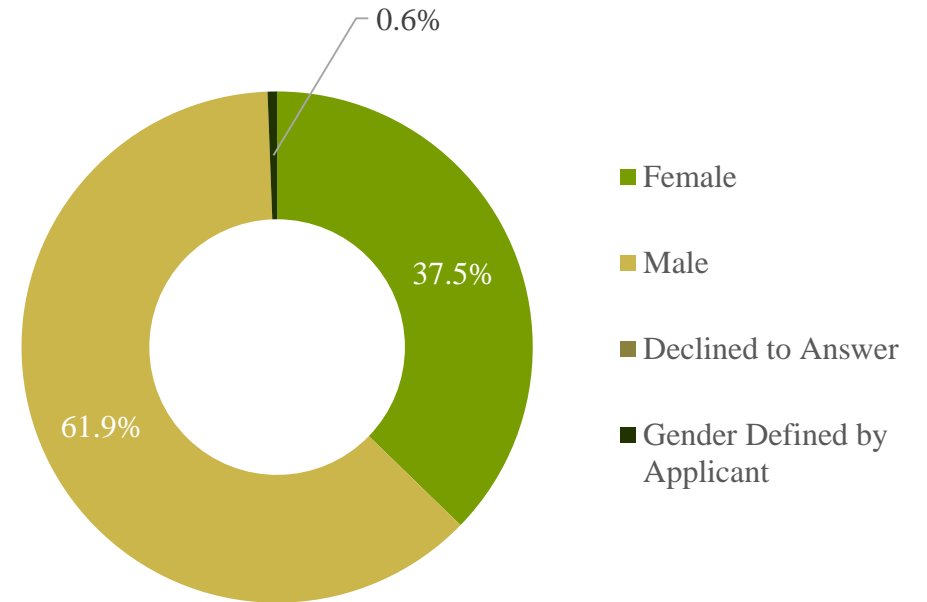


Agent Applications | March 13, 2025

Demographics of Approved and Pending Medical Marijuana Treatment Center Agents

Gender	#	%
Female	2,233	37.5%
Male	3,686	61.9%
Declined to Answer	0	0.0%
Gender Defined by Applicant	35	0.6%
Total	5,954	100.0%

Gender of Approved and Proposed MTC Agents

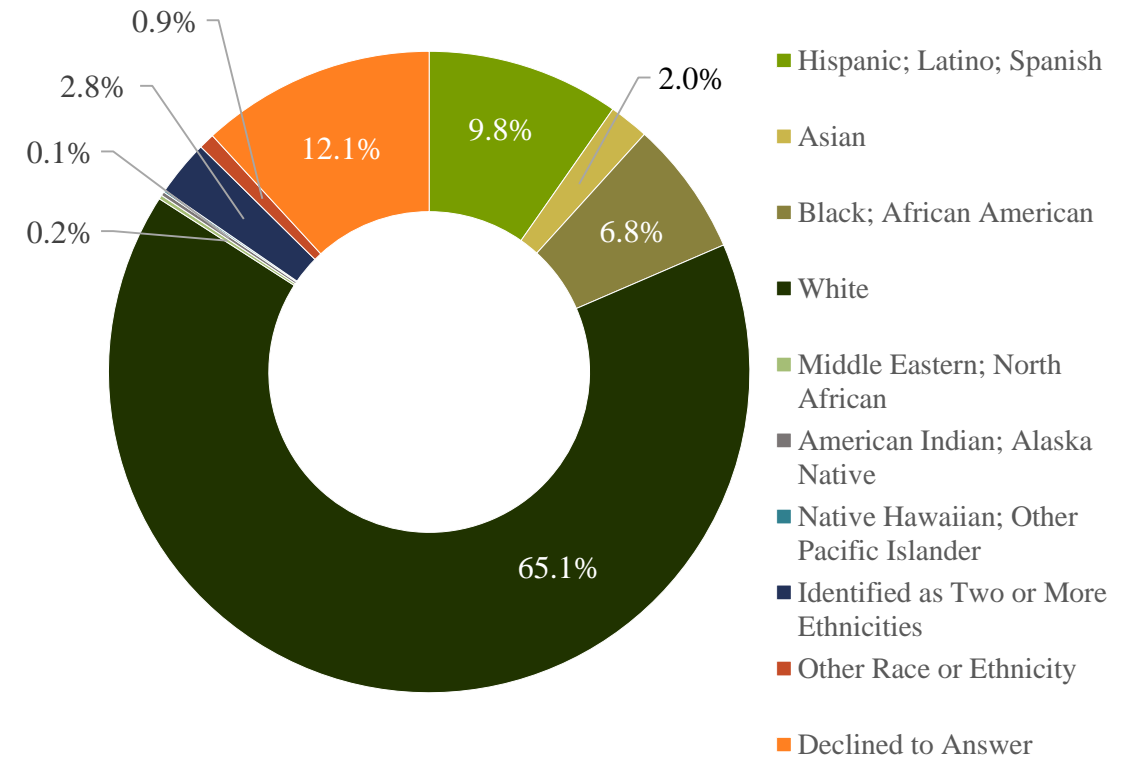


Agent Applications | March 13, 2025

Demographics of Approved and Pending Marijuana Establishment Agents

Race/Ethnicity	#	%
Hispanic; Latino; Spanish	2,151	9.8%
Asian	431	2.0%
Black; African American	1,492	6.8%
White	14,293	65.1%
Middle Eastern; North African	55	0.3%
American Indian; Alaska Native	51	0.2%
Native Hawaiian; Other Pacific Islander	16	0.1%
Identified as Two or More Ethnicities	623	2.8%
Other Race or Ethnicity	191	0.9%
Declined to Answer	2,652	12.1%
Total	21,955	100.0%

Race/Ethnicity of Approved and Proposed ME Agents

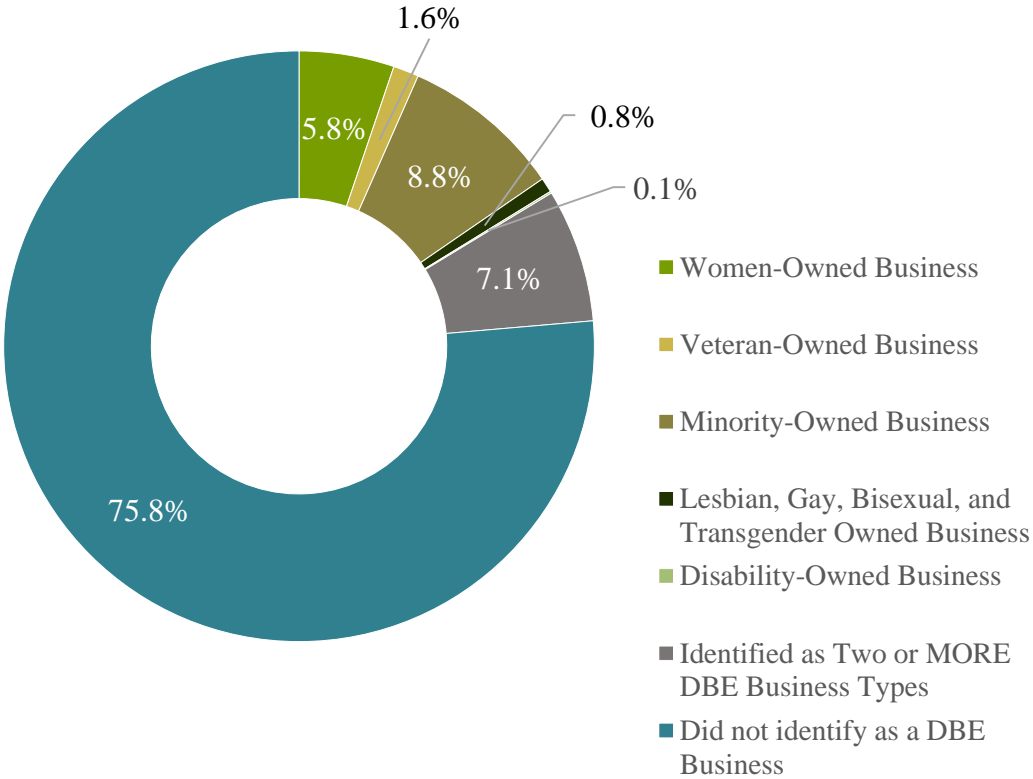


Licensing Applications | March 13, 2025

Disadvantaged Business Enterprise Statistics for Approved Licensees

Type	#	% of Group
Women-Owned Business	94	5.8%
Veteran-Owned Business	25	1.6%
Minority-Owned Business	141	8.8%
Lesbian, Gay, Bisexual, and Transgender Owned Business	13	0.8%
Disability-Owned Business	2	0.1%
Identified as Two or MORE DBE Business Types	114	7.1%
Did not identify as a DBE Business	1,219	75.8%
Total	1,608	100.0%

DBE Statistics Approved Licensees

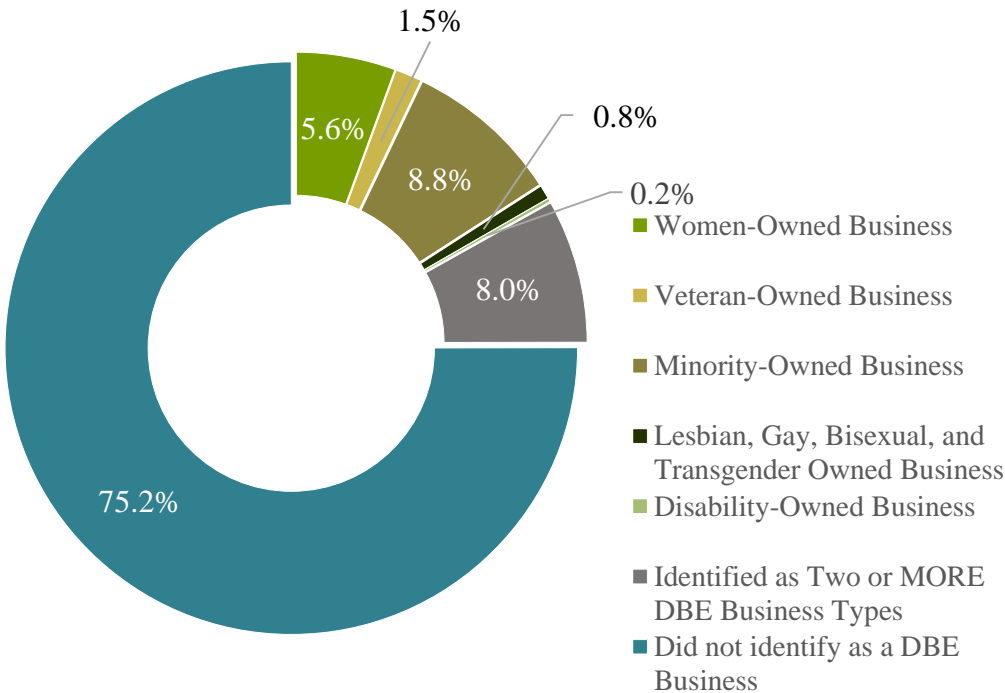


Licensing Applications | March 13, 2025

Disadvantaged Business Enterprise (DBE) Statistics for Pending and Approved License Applications

Type	#	% of Group
Women-Owned Business	101	5.6%
Veteran-Owned Business	27	1.5%
Minority-Owned Business	160	8.8%
Lesbian, Gay, Bisexual, and Transgender Owned Business	14	0.8%
Disability-Owned Business	4	0.2%
Identified as Two or MORE DBE Business Types	146	8.0%
Did not identify as a DBE Business	1,367	75.2%
Total	1,819	100.0%

DBE Statistics for Pending & Approved License Applications



*As of 2/27/25

Adult Use Agent Applications | March 13, 2025

Total Agent Applications: 84,841

- 177 Total Pending
 - 169 Pending Establishment Agents
 - 8 Pending Laboratory Agents
- 4,079 Withdrawn
- 2,973 Incomplete
- 7,013 Expired
- 48,813 Surrendered
- 6 Denied / 2 Revoked
- **21,778 Active**

Of the 177 Total Pending:

- 13 not yet reviewed
- 158 CCC requested more information
- 6 awaiting third party response
- 0 review complete; awaiting approval



Medical Use Agent Applications | March 13, 2025

The total number of MTC agent applications received by status.

MTC Agent Application	#
Pending MTC Agent Applications	0
Pending Laboratory Agent Applications	0
Incomplete	37
Revoked	13
Denied	31
Surrendered	21,401
Expired	3,548
Active	5,954
Total	30,984





The Commission is in recess