

8/13 Public Meeting Book - Cannabis Control Commission Public Meeting

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935_CMR_501_Redline_Ch65

Next Meeting Date & Adjournment

20260813 PPT.pdf

August 11, 2026

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

**August 13, 2026
10:00 AM**

**Remote via [Microsoft Teams](#)* and In-Person at Cannabis Control Commission,
Second Floor Public Meeting Room, Worcester Union Station, 2 Washington Square, Worcester**

PUBLIC MEETING AGENDA

- I. Call to Order
- II. Commissioners' Comments & Updates
- III. Minutes
 - 1. July 9, 2026
- IV. Executive Director and Commission Staff Report
 - 1. Social Equity Program Application Period Announcement
 - 2. Host Community Municipal Equity Update
 - 3. Social Consumption Regulatory Implementation Update
 - 4. Secret Shopper Pilot Report: Shelf Audit Notices
 - 5. Licensing Data Updates
- V. Staff Recommendations on Changes of Ownership
 - 1. Analytics Labs LLC
 - 2. Ascend Mass, LLC
 - 3. Southcoast Apothecary LLC
 - 4. Temescal Wellness of Massachusetts LLC
- VI. Staff Recommendations on Final Licenses
 - 1. 686 Cultivation LLC (#MC283899), Cultivator- Tier 2, Indoor
 - 2. ACMJ, Inc (#MC283322) Cultivator, Tier 1, Indoor
 - 3. Cedar Roots, LLC (#MP281872) Product Manufacturer
 - 4. Core Empowerment, LLC (#MR285081) Retail



5. Great Northern Wellness, LLC (#MR285477) Retail
6. Mellow Tiger, LLC (#MR285096) Retail
7. Porter Square Remedies, LLC (#MR284796) Retail
- VII. Staff Recommendations on Provisional Licenses
 1. GodsendHP, Inc. (#MRN285437) Retail
 2. Grateful Delivery, LLC (#DOA100192) Marijuana Courier
 3. Hardwick Mill Greenery, Inc. (#MPN282387) Product Manufacturer
 4. M1 Enterprises, LLC (MCN284013) Cultivator – Tier 3 Indoor
 5. Pioneer Valley Trading Company, Inc. (#MCN284021) Cultivator Tier 2, Indoor
 6. Pioneer Valley Trading Company, Inc. (#MCN284022) Cultivator Tier 6, Outdoor
 7. Pioneer Valley Trading Company, Inc. (#MPN282390) Product Manufacturer
 8. Route 133 Cannabis, LLC (#MRN285509) Retail
 9. Westfield Ultra Premium, LLC (#RMDA4445) Medical Marijuana Treatment Center
- VIII. Commission Discussion and Votes
 1. Administrative License Extension Discussion
 2. Tier Expansion Discussion
 3. Chapter 65 Emergency Regulations Policy Questions
 4. Discussion of Chapter 65 Fall Regulatory Round
 5. Triannual Review of Executive Session Minutes
- IX. Executive Session

The Commission may enter closed executive session under G.L. c. 30A, § 21(a)(3) to discuss strategy with respect to litigation if an open meeting may have a detrimental effect on the litigating position of the public body and the chair so declares.

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).
- X. New Business Not Anticipated at the Time of Posting
- XI. Next Meeting Date
- XII. 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

**July 9, 2026
10:00 AM**

Remote via [Microsoft Teams*](#) and In-Person at Cannabis Control Commission, Second Floor Public Meeting Room, Worcester Union Station, 2 Washington Square, Worcester

PUBLIC MEETING MINUTES

Documents:

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

In Attendance:

- Chair Christopher Harding
- Commissioner Xiomara DeLobato
- Commissioner Anthony Wilson

I. Call to Order

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

II. Chairman's Comments & Updates – 00:00:18

- Commissioner DeLobato shared updates regarding her work the last few weeks and how impressed she was with staff. She added she was eager for more conversations and had been focusing on Social Consumption (SC) implementation. Commissioner Wilson mentioned being sworn in by the Governor and how great it was to be part of the organization. The Chair mentioned that the State House gave free tours and how he looked forward to the conversations later in the meeting.

III. Minutes – 00:03:49

- June 11, 2026



- Commissioner DeLobato moved to approve the June 11, 2026, Commission Public Meeting minutes.
- Commissioner Wilson seconded the motion.
- The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
- The Commission unanimously approved the June 11, 2026, Commission Public Meeting minutes.
- June 17, 2026
- Commissioner DeLobato moved to approve the June 17, 2026, Commission Public Meeting minutes.
- Commissioner Wilson seconded the motion.
- The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
- The Commission unanimously approved the June 17, 2026, Commission Public Meeting minutes.

IV. Executive Director and Commission Staff Report – 00:04:38

- Executive Director (ED) Travis Ahern shared that more updates regarding Host Community Municipal Equity and the Secret Shopper Program were intended for the August Public Meeting (PM). He also noted that a general video being produced by the Digital and Creative Services team to introduce the new Commissioners to the public.

1. Social Consumption Regulation Implementation

- The ED presented a project overview with the project goals and background. He noted Commissioner DeLobato was the main sponsor. He provided an update on the phases on where they are in the project and highlighted phase three in terms of execution. He noted that tasks had been assigned and they were holding regular team meetings which also would include external consulting teams on specific questions. He presented the project process and noted that 90% of foundational deliverables were underway. He also presented next steps and added that the Responsible Vendor Training (RVT) application and launch was being finalized and actively worked on and that the local advisory engagement would be starting in July with Commissioner DeLobato. He added that the funding for public awareness was included in a supplemental budget, and they would see if they were able to achieve additional supplemental funding for operations. Commissioner DeLobato noted a lot of work had been done and that the Commission was working diligently to ensure that they were developing and implementing a strong foundation for Social Consumption. Commissioner DeLobato thanked Licensees and encouraged them to reach out to



have more conversations. She added that her biggest commitment was that municipal partners feel confident working with leadership here to provide economic value for their local economy.

2. Licensing Data Update

- Director of Licensing Olivia Koval (Director Koval) presented the licensing data update. She presented commence operations and Host Community Agreement (HCA) data. She noted they had received another 50 compliant HCAs, and they still had 100 non-compliant HCAs. Commissioner Wilson requested a total number of Licensees and compliant HCAs per county in the future. Director Koval also presented extension requests data from the time extensions were granted. Commissioner DeLobato invited municipal leaders to partner with the Commission to help the agency stay fully informed. Director Koval noted that more information was contained within the PM packet. Commissioner Wilson asked if she knew how many active extensions there were and she responded she would get the information. The ED added that they would have an October conversation around extensions.
- The Chair noted they would take the agenda item Enforcement Actions out of order.

V. Enforcement Actions – 00:26:26

1. Stipulated Agreements

i. Legal Greens LLC

- Enforcement Counsel Timothy Goodin (EC Goodin) explained the agenda item was a continuation of the June PM conversation. First Assistant Enforcement Counsel Jacob Nielson (First AEC Nielson) presented the revised Stipulated Agreement for the board's consideration. First AEC Nielson provided an overview of the modifications to the Stipulated Agreement since the last discussion. He explained the affirmative relief and noted he believed it addressed the Commissioner's concerns. Commissioner Wilson thanked him for their work on the revised document and expressed that sending it back for modifications was not a reflection of the work. He supported the current proposal. Commissioner DeLobato echoed Commissioner Wilson's comments and agreed to be in support.
- Commissioner DeLobato moved to approve the Stipulated Agreement.
- Commissioner Wilson seconded the motion.
- The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
- The Commission unanimously approved the Stipulated Agreement.

VI. Staff Recommendations on Change of Ownership – 00:33:08



- Commissioner Wilson asked about current entities who had Direct or Indirect Control and for an explanation of the zero percentage. Director Koval stated that often times they had difficulty quantifying and Director of Investigations Katherine Binkoski (Director Binkoski) confirmed Licensees have done their best to put an educated guess at their percentage of control, but if it was not tied to direct financial equity, it could be a gray area. She mentioned staff were working on a proposal for a more streamlined process. Commissioner Wilson asked about architectural review and what was the minimum and how it was conducted by staff. Director Binkoski explained that architectural review was done by the Investigations and Compliance team by License type. She noted they had a guidance document online. Commissioner Wilson mentioned there was no definition in the regulations and he suggested leaving them to municipalities. He also mentioned not needing the agricultural preservation restriction. He asked if the Consumer data system was in Metrc and what it recorded. Director Binkoski explained the process of authenticating identification and stated that the regulations prohibited retaining data beyond what was needed to confirm identification.
- Licensing Analyst Jaime Wakefield presented on behalf of the Licensing department the Staff Recommendations for Changes of Ownership, Renewals, Final Licenses, and Provisionals.

1. Cannabis Connection Inc. – add one individual and one entity.

- Commissioner DeLobato moved to approve the Change of Ownership.
- Commissioner Wilson seconded the motion.
- The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
- The Commission unanimously approved the Change of Ownership.

2. MCR Labs LLC – add three individuals and one entity.

- Commissioner DeLobato moved to approve the Change of Ownership.
- Commissioner Wilson seconded the motion.
- The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
- The Commission unanimously approved the Change of Ownership.

VII. Staff Recommendations on Renewal Licenses – 00:50:24

1. Patriot Care Corp. (#RMD165)

- Director Koval explained the case was brought before the board because the Licensee sold below the required canopy and in previous discussions and per regulations, they brought it before the board for their review and consideration if they wished to do a



- tier relegation. She added they inquired with the Licensee on why they were essentially below 70% and they responded that in the previous six months they were operating without a wholesale manager which had an immediate impact on their wholesales. Commissioner Wilson noted he was in favor of renewing the License and not doing the tier relegation and Commissioner DeLobato agreed. The Chair agreed and noted he did not understand why they would do that except in a real punitive situation or voluntary. The Chair confirmed they would not relegate down.
- Commissioner DeLobato moved to approve the renewal of Patriot Care Corp. (#RMD165).
 - Commissioner Wilson seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
 - The Commission unanimously approved the renewal of Patriot Care Corp. (#RMD165).

VIII. Staff Recommendations on Final Licenses – 00:53:38

1. Chief Cannabis, LLC (#MR285404), Retailer
 2. Pharmacannis Massachusetts, Inc. (#MC282047), Cultivator, Tier 7 / Indoor
 3. Pharmacannis Massachusetts, Inc. (#MP282063), Product Manufacturer
- Commissioner DeLobato moved to approve the Final Licenses.
 - Commissioner Wilson seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
 - The Commission unanimously approved the Final Licenses.

IX. Staff Recommendations on Provisional Licenses – 00:54:28

1. Legal Greens Boston LLC (#MRN285427), Retailer
 - Commissioner DeLobato moved to approve the Provisional License.
 - Commissioner Wilson seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
 - The Commission unanimously approved the Provisional License.
2. Legal Greens Boston LLC (#DOA100194), Courier



- Commissioner DeLobato moved to approve the Provisional License.
 - Commissioner Wilson seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
 - The Commission unanimously approved the Provisional License.
3. Lucky Green Ladies, LLC (#DOA100205), Courier
- Commissioner DeLobato moved to approve the Provisional License.
 - Commissioner Wilson seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
 - The Commission unanimously approved the Provisional License.
4. Morabeza LLC (#MPN282295), Product Manufacturer
- Commissioner DeLobato commented that their Positive Impact Plan Goal #2 was a creative option and she encouraged that type of creativity from Licensees and operators when engaging with their community. She added it was an awesome form of investment that could be life-changing and transformative.
 - Commissioner DeLobato moved to approve the Provisional License.
 - Commissioner Wilson seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
 - The Commission unanimously approved the Provisional License.
5. Emerald Grove, Inc. (#RMDA4025), Medical Marijuana Establishment
- Commissioner DeLobato moved to approve the Provisional License.
 - Commissioner Wilson seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
 - The Commission unanimously approved the Provisional License.
 - The Commission took a brief recess returning at 11:15 AM. (Returned at 01:14:04).

X. Hearing Officer Recommended Decisions



1. MassBiolytics

- General Counsel Kajal Chattopadhyay (GC Chattopadhyay) presented consideration of the Hearing Officer's recommended decision in the matter of MassBiolytics Corporation, an Independent Testing Laboratory (ITL). He noted the Hearing Officer granted the Commission's motion to dismiss for failure to file timely to a hearing request which resulted in the revocation of the License. He highlighted the board's options. The Chair asked if they could provide guidance and GC Chattopadhyay confirmed they could remand it for the Hearing Officer with parameters in terms of the things they thought needed to be more fully developed. The Chair shared his initial perception and takeaways around the offenses and revocation of the License. Commissioner Wilson confirmed there was no factual record as there was no hearing regarding the merits of the matter. He asked if they regained their ISO certification and GC Chattopadhyay confirmed they did. Commissioner DeLobato added that revocation seemed extreme to her and wanted to offer an alternative option that still held significant accountability that addressed the severity of the finds while still allowing the Licensee a chance to correct or choose to take a different direction in their business. The Chair agreed. Commissioner Wilson noted that the licensee did not have a hearing because they themselves did not engage with the process in a way where they could develop the hearing record in their favor. The ED noted that from his understanding that not all matters had been cured and that their accreditation lasted through the end of the month. The Chair explored next steps. Commissioner DeLobato noted there had been multiple attempts for transparency and being communicative and thought through the possibility of suspension for the operator to take care of things. Commissioner Wilson asked for a modification to reflect an extension and GC Chattopadhyay suggested choosing a specific time limit of suspension. Commissioner Wilson stated the proposal made sense to him and asked clarity around further deliberation. The ED mentioned that an ITL had been suspended in the past and provided examples of language and courses of action. GC Chattopadhyay provided context of the remand option. Commissioner DeLobato asked GC Chattopadhyay to describe the process for remanding and asked if it would restart the process of the Hearing Officer and Licensee. Commissioner Wilson noted he was leaning towards suspension. GC Chattopadhyay requested a quick break.
- The Commission took a brief recess returning at 12:30 PM. (Returned at 02:38:29).
- GC Chattopadhyay proposed draft motion language. He explained that the motion would immediately suspend MassBiolytics for a period of time that had yet to be determined upon issuance of the final decision. He added it would create that suspension subject to certain conditions which he outlined and further directed GC Chattopadhyay to take all the steps necessary to effectuate the final decision of the board. He added that the suspension would remain in effect until either the expiration of the time period of full compliance with all the conditions outlined in the language or in the event that the Licensee is unable to resolve all the violations by the end of the suspension, their License would be automatically revoked. The Chair suggested



90 days, and Commissioner Wilson agreed. The Chair asked if they were fully compliant prior to the 90 days, if they could be reinstated and back in business prior to the 90 days being over and GC Chattopadhyay confirmed. GC Chattopadhyay noted that number five of the conditions was intended to also cover the agents that were necessary for purposes of completing testing between now and the end of July. Commissioner Wilson asked that in order to cure the violations, under condition five, if they needed to have any other agent registrations. GC Chattopadhyay noted that the spirit of number five was intended to include what he had addressed. The Chair noted they were in agreement for the 90 days from the issuance of the Final Order.

- Commissioner DeLobato moved to modify the Hearing Officer's Recommended Decision in Enforcement Case No. ENF-2025-1787 regarding the Massbiolytics Corporation ("Licensee") to change the ordered relief from revocation of the License (IL 281290) to a suspension of the License for a period of 90 days subject to the conditions outlined below to provide Massbiolytics Corporation an opportunity to resolve all violations listed in the Order to Show Cause; and a further motion to direct the General Counsel to take necessary steps to effectuate these changes and issue a Final Decision consistent with the conditions below.
1. License # IL 281290 and all agent registrations affiliated with IL281290 shall be suspended effective upon issuance of the Commission's Final Decision;
 2. The Licensee shall post and maintain a copy of the Final Decision, in its entirety, on the outside of all public entrances to its establishment throughout the term of the suspension;
 3. Upon issuance of the Commission's Final Decision, the Licensee may not accept any new samples for testing;
 4. The Licensee may finalize the testing of any in-progress lab samples in its inventory prior to July 31, 2026, or return any such samples that are not completed by such date to the Marijuana Establishment or Medical Marijuana Establishment of origin, or transfer any such samples to another licensed ITL before such date. The Licensee shall report the true and accurate results for any in-progress lab samples to the Commission within 72 hours of analysis; and provide the underlying data and lab samples to other licensed ITLs on or before July 31, 2026
 5. Massbiolytics Corporation shall identify agents essential for the security and general maintenance of the laboratory and provide the names of those agents to Testing@CCCMass.com Attn: Director of Testing. Upon satisfactory review of the agents proposed by Massbiolytics Corporation, the Commission may approve reinstatement of their Agent Registrations for that limited purpose;
 6. Massbiolytics Corporation shall cooperate with the Commission as necessary and to facilitate any inspections by Commission staff on the Premises;

The Order shall take effect upon issuance of the Final Decision and shall remain in effect until expiration of the term of the suspension or demonstrated resolution of all violations listed in the Order to Show Cause and compliance of all conditions listed



herein, whichever comes first. Should Massbiolytics Corporation fail to resolve all violations listed in the Order to Show Cause within 90 days, the License (IL 281290) will be automatically revoked. Additionally, failure to comply with the conditions of the Order may result in further enforcement action against Massbiolytics Corporation up to and including the issuance of a monetary penalty, suspension or revocation of licensure.

- Commissioner Wilson seconded the motion.
- The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
- The Commission unanimously approved the motion.

XI. Commission Discussions and Votes – 02:51:58

1. Further 2026 Regulatory Round Discussion Topics

- The Chair explained that they would be discussing the proposed policy areas that the Commission would be reviewing during the fall round of regulatory amendments in response to Chapter 65 and other related policy areas. The ED presented an executive summary of regulatory amendments including the emergency regulatory package, fall regulatory promulgation package, and spring regulatory promulgation package. He noted at the August 13th PM they would bring specific timelines and begin the discussion of some policy questions for the board. He mentioned the planned August 25th PM and Public Hearing would be used to close out the emergency regulation process and to get feedback on testing. GC Chattopadhyay presented a Gantt chart with respect to the emergency regulations and the started the process. He noted the goal was to develop similar Gantt charts in the future for the subsequent regulatory rounds. He provided an overview of the emergency regulatory package process as current and next steps. He then provided an overview of the fall regulatory promulgation package and policy areas and noted it was going to be a very large package. He gave an overview of the topics that were either required by Chapter 65 or had been discussed by the Red Tape Removal Committee. GC Chattopadhyay mentioned the August 25th Public Hearing prior to making amendments to the testing regulations and that it would allow them to go into testing as part of the next regulatory round. The ED highlighted and explained the priorities, timelines and assumptions for the spring regulatory promulgation. He also noted that at the August 13th PM they would get more direction on some of the policy discussions they needed from the board.

2. Tier Relegation Discussion

- The Chair explained the topic up for discussion touched replacing canopy-based cultivation tiers with annual production weight tiers. He noted the memorandum was included in the PM packet and available to read. Commissioner Wilson presented a new process when it came to canopy opposed to the current system of granting



cultivation Licenses and tiers based on the square footage of their canopy. He noted the current definition for Canopy was ambiguous and there was not a single point of reference for Enforcement staff where the canopy should be referenced to. He added that canopy was a bad measure of production and that one of the main concerns the first board had was controlling the amount of Cannabis being produced in the state and not controlling production like they envisioned. He expressed that canopy was hard to measure and enforce and added the regulations did not allow you to change your tier until you produced a crop and the Commission knew what was produced. He noted that they already collected the data needed for a weight-based system within the harvest report. He noted it allowed them to be more consistent in the sense that they could change tiers if they found it necessary or could relegate individual operators depending on where they were. He noted that if they were to move forward with the type of proposal, they would not want to negatively impact any of the existing Licenses. Commissioner DeLobato noted she appreciated the memorandum as it was very helpful and she thought it made sense to explore a weight-based model. She added she thought it was one of the many areas that needed to be revisited to explore and modernize best practices. The Chair agreed it was very helpful and shared he thought there was merit. He mentioned he spoke with former Chair Steven Hoffman about the policy. Commissioner DeLobato noted it would allow them to be more finite in understanding how much product was being cultivated in a more accurately based way. She added she was interested in hearing feedback from Licensees and Operators. Commissioner Wilson expressed he wanted to proceed with the proposal in a way that didn't impact current licenses. Commissioner DeLobato noted the approach would allow them to forecast the environment and trends. The Chair explained that of the six motions Commissioner Wilson put forward there were three that he saw no issues. Commissioner DeLobato noted that long-term it was something that needed to be explored. She added it was another major project and that there were priorities more pressing. Commissioner Wilson suggested six motions and explained that none of the information committed the board to any regulatory change. The Chair felt he did not have enough information to approve three of the motions. Commissioner DeLobato suggested a working group. Commissioner Wilson mentioned that he heard from the industry that they wanted the Commission to address prices and the value of product. The ED suggested an informal comment period or running the proposal to ask for feedback from industry associations.

- Commissioner Wilson moved that the Executive Director, under the delegated authority to renew License applications, shall flag for the Commissioners any Cultivation License Renewal application that is below 70% of the existing tier relegation calculation per existing regulations, but shall not remove said License renewal application from the Executive Director's Renewal checklist on the basis of the 70% calculation alone.
- Commissioner DeLobato seconded the motion.
- The Chair took a roll call vote:
 - Commissioner DeLobato – Yes



- Commissioner Wilson – Yes
 - Chair Harding – Yes
- The Commission unanimously approved the motion.
- Commissioner Wilson moved that the Executive Director direct the Legal Department to draft modifications to 935 Code Mass. Regs. § 500.000 and 935 Code Mass. Regs. § 501.000 consistent with this memorandum for consideration by the Commission at its January 2027 meeting.
- Commissioner DeLobato seconded the motion.
- The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
- The Commission unanimously approved the motion.
- Commissioner Wilson moved that the Legal Department draft a penalty section imposing appropriate fines on Licensees that produce more Cannabis than their tier permits for the Board’s review at the January 2027 meeting.
- The Chair asked if this already existed. Commissioner Wilson noted that if the motion passed, the penalty was not meant to be onerous and merely meant to subtract the value of the excess Cannabis that was produced. Commissioner DeLobato said the Commission did not have fines for Licensees that were producing less or more. Commissioner Wilson explained that licensees who go beyond their tier are subject to certain penalties. The ED clarified that they did not have a fine schedule but had worked through fines within the Stipulated Agreements.
- Commissioner DeLobato seconded the motion.
- The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
- The Commission unanimously approved the motion.
- The Chair shared he had concerns around three other draft motions proposed by Commissioner Wilson. He read the first proposed draft motion: That the sections of the regulations defining the processes for “Tier Expansion” and “Tier Relegation” be deleted within the next round of regulatory promulgation with the exception of Licensees requesting voluntary relegation or expansion. The Commissioners discussed tier relegation and expansion. The Chair and Commissioner DeLobato shared concerns about making a final decision immediately. The Chair suggested working with staff for further discussion and the motion was tabled to be addressed at a future meeting. He also read the next proposed draft motion: That the Legal department review the regulations to remove the use of the term “canopy” and replace it with weight-based terms such as grams or kilograms of annual production, except where canopy remains relevant for non-tier purposes, and provide a red-line version



for the board's review at the September 2026 meeting. The Commissioners agreed to table the motion as it was too premature. Lastly, the Chair read the proposed motion language: That, upon the passage of revised regulations, the licensing schedule be modified to reflect the weight-based licensing scheme discussed in this memorandum, and further that the Executive Director direct the Licensing and Enforcement departments to prepare a memorandum explaining how this regulatory change will be implemented, specifically identifying how a weight based system will change the review of cultivation License applications. The Commissioners decided to table the motion. The Chair thanked Commissioner Wilson and staff for all their work and Commissioner Wilson appreciated the conversation.

XII. Next Meeting Date – 04:23:06

- The next meeting was scheduled for July 30, 2026.

XIII. Adjournment – 04:23:26

- Commissioner Wilson moved to adjourn.
- Commissioner DeLobato seconded the motion.
- The Chair took a roll call vote:
 - Commissioner DeLobato – Yes
 - Commissioner Wilson – Yes
 - Chair Harding – Yes
- The Commission unanimously approved to adjourn.



Social Consumption Regulatory Implementation Project

Project Status Updates: January – August 2026

Project Management Planning

- Finalized Charters, established governance, and developed planning tools and project documents
- Launched collaboration sites and established access permissions
- Conducted 4 individual working group kick-off meetings and initiated deliverable planning
- Prioritized deliverables, identified dependencies and risks, and established work sequence
- Established recurring collaboration meeting cadence
- Prepared stakeholder engagement approach.

Detailed Deliverable Planning

- Conducted detailed planning sessions for priority deliverables across all 4 working groups
- Developed process maps and operational workflows to support implementation
- Transitioned from 4 independent working groups to 1 collaborative project structure
- Produced recurring project reporting and public meeting materials
- Planned public education, communications, local advisory, and stakeholder engagement activities
- Reassessed deliverables and refined sequencing to focus resources on priority work

Project Execution & Implementation Readiness

- Facilitate project strategy sessions to align and plan implementation milestones
- Launched electronic municipality out-in form
- Collected EPCO requirements and incorporating into implementation timeline
- Initiated Public Education supplemental budget planning
- Conducted external stakeholder engagement for Local Advisory group
- Planning Public Education external engagement
- Reviewing existing operational processes and documentation to incorporate social consumption
- Responsible Vendor Training
 - Facilitated external stakeholder meetings to develop Social Consumption curriculum
 - Developed Trainer application and internal review checklist
 - Updated public-facing website content
 - Defined future-state RVT operational processes and improvement opportunities
 - Developing RVT Trainer compliance audit process
- Supplemental License
 - Developed license format, application materials, and system requirements aligned with existing licensing processes.
 - Defined automation needs and assessed implementation timelines.
 - Updating Model HCA template and associated guidance
 - Drafted license application
 - Built Supplemental License inspection framework, including scheduling procedures, operational requirements, safety considerations, and supporting resources.

Analytics Labs, LLC 0343-COO-01-0226

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Licensee Business Name:	Analytics Labs, LLC
Establishment Address:	28C Appleton Street, Suite 3, Holyoke, MA 01045
SEP or EEA?	No

2. License(s) Affected by this Change Request:

License Number	License Type
IL281280	Independent Testing Laboratory

3. The licensee has paid the applicable fees for this change request.

4. Current Person(s) who have Direct or Indirect Control:

Individual	Role	Ownership Percentage	Control Percentage
Tina Wae	Person with Direct or Indirect Control	49.43%	49.43%
Tiffany Madru	Person with Direct or Indirect Control	23.48%	23.48%
Ted Madru	Person with Direct or Indirect Control	25.95%	25.95%

5. The licensee proposes adding the following individuals as Persons Having Direct or Indirect Control:

Individual	Role	Proposed Ownership Acquired (%)
John Ferriter	Person with Direct or Indirect Control	25%
Alyssa Dube	Person with Direct or Indirect Control	25%

6. Background checks were conducted on all proposed parties within and no suitability issues were discovered.



7. Based on Commission information, the proposed parties do not exceed any ownership or control limits over any license type.
8. The proposed parties do not hold any ownership or control interests in any other Commission-issued licenses.

CHANGE OF OWNERSHIP 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. The licensee and proposed parties may now effectuate the approved change.
2. The licensee shall notify the Commission when the change has occurred.
3. The licensee shall submit a change of name request following this approval if any business or doing-business-as names associated with the license(s) will require modification.
4. The licensee is subject to inspection to ascertain compliance with Commission regulations.
5. The licensee shall remain suitable for licensure.
6. The licensee shall cooperate with and provide information to Commission staff.
7. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) and/or 935 CMR 501.105(1) after effectuating the change, if applicable, and shall give Commission staff 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.



Ascend Mass, LLC 0350-COO-03-0226

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Licensee Business Name:	Ascend Mass, LLC
Establishment Address:	268-274 Friend Street, Boston, MA 02114 and 1089 Washington Street, Newton, MA 02465
SEP or EEA?	No

2. License(s) Affected by this Change Request:

License Number	License Type
MR282077	Marijuana Retailer
MR282837	Marijuana Retailer

3. The licensee has paid the applicable fees for this change request.

4. Current Person(s) who have Direct or Indirect Control:

Individual	Role	Ownership Percentage	Control Percentage
Francis Perullo	Person with Direct or Indirect Control	0	100
Scott Swid	Person with Direct or Indirect Control	0	0
Joshua Gold	Person with Direct or Indirect Control	0	0
Shmuel Brill	Person with Direct or Indirect Control	0	0
John Hartmann	Person with Direct or Indirect Control	0	0
Roman Nemchenko	Person with Direct or Indirect Control	0	0
Julie Francis	Person with Direct or Indirect Control	0	0

5. Current Entity(ies) who have Direct or Indirect Control:

Entity	Role	Ownership Percentage	Control Percentage
Ascend Mass, Inc.	Entity with Direct or Indirect Control	100	100

COO Executive Summary 1



Ascend Wellness Holdings, LLC	Entity with Direct or Indirect Control	100	100
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6. The licensee proposes adding the following individuals as Persons Having Direct or Indirect Control:

Individual	Role	Proposed Ownership Acquired (%)
Abner Brill Kurtin	Person with Direct or Indirect Control	1.6

7. The licensee proposes adding the following as Entities Having Direct or Indirect Control:

Entity	Role	Proposed Ownership Acquired (%)
AGP Partners, LLC	Entity with Direct or Indirect Control	13.7

8. Background checks were conducted on all proposed parties within and no suitability issues were discovered.
9. Based on Commission information, the proposed parties do not exceed any ownership or control limits over any license type.
10. The following party(ies) hold ownership interests in the license(s) listed below:

Individual/Entity	Name of Establishment	License Number	License Type	Ownership Percentage	Control Percentage
Abner Brill Kurtin	MassGrow, LLC	MP281300	Marijuana Product Manufacturer	11.2	27.1
Abner Brill Kurtin	MassGrow, LLC	MC281255	Marijuana Cultivator	11.2	27.1
AGP Partners, LLC	MassGrow, LLC	MP281300	Marijuana Product Manufacturer	100	100
AGP Partners, LLC	MassGrow, LLC	MC281255	Marijuana Cultivator	10	10

11. Commission staff conducted an organizational and financial inspection into the parties associated with this request and found no issues or inconsistencies with the information provided to the Commission.

CHANGE OF OWNERSHIP 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. The licensee and proposed parties may now effectuate the approved change.
2. The licensee shall notify the Commission when the change has occurred.
3. The licensee shall submit a change of name request following this approval if any business or doing-business-as names associated with the license(s) will require modification.
4. The licensee is subject to inspection to ascertain compliance with Commission regulations.
5. The licensee shall remain suitable for licensure.
6. The licensee shall cooperate with and provide information to Commission staff.
7. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) and/or 935 CMR 501.105(1) after effectuating the change, if applicable, and shall give Commission staff 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.



Southcoast Apothecary, LLC 0349-COO-03-0226

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Licensee Business Name:	Southcoast Apothecary, LLC
Licensee d/b/a Name:	Ascend
Establishment Address:	95 Coggeshall Street, Bedford, MA 02746
SEP or EEA?	No

2. License(s) Affected by this Change Request:

License Number	License Type
MR283075	Marijuana Retailer

3. The licensee has paid the applicable fees for this change request.

4. Current Person(s) who have Direct or Indirect Control:

Individual	Role	Ownership Percentage	Control Percentage
Francis Perullo	Person with Direct or Indirect Control	0	100
Steven Rohlfing	Person with Direct or Indirect Control	0	0
Christopher Leavy	Person with Direct or Indirect Control	0	0
Scott Swid	Person with Direct or Indirect Control	0	0
Shmuel Brill	Person with Direct or Indirect Control	0	0
John Hartmann	Person with Direct or Indirect Control	0	0
Joshua Gold	Person with Direct or Indirect Control	0	0

5. Current Entity(ies) who have Direct or Indirect Control:

Entity	Role	Ownership Percentage	Control Percentage
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Ascend Wellness Holdings, LLC.	Entity with Direct or Indirect Control	100	100
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6. The licensee proposes adding the following individuals as Persons Having Direct or Indirect Control:

Individual	Role	Proposed Ownership Acquired (%)
Abner Brill Kurtin	Person with Direct or Indirect Control	1.6

7. The licensee proposes adding the following as Entities Having Direct or Indirect Control:

Entity	Role	Proposed Ownership Acquired (%)
AGP Partners, LLC	Entity with Direct or Indirect Control	13.7

8. Background checks were conducted on all proposed parties within and no suitability issues were discovered.
9. Based on Commission information, the proposed parties do not exceed any ownership or control limits over any license type.
10. The following party(ies) hold ownership interests in the license(s) listed below:

Individual/Entities	Name of Establishment	License Number	License Type	Ownership Percentage	Control Percentage
Abner Brill Kurtin	MassGrow, LLC	MP281300	Marijuana Product Manufacturer	11.2	27.1
Abner Brill Kurtin	MassGrow, LLC	MC281255	Marijuana Cultivator	11.2	27.1
AGP Partners, LLC	MassGrow, LLC	MP281300	Marijuana Product Manufacturer	100	100
AGP Partners, LLC	MassGrow, LLC	MC281255	Marijuana Cultivator	10	10

11. Commission staff conducted an organizational and financial inspection into the parties associated with this request and found no issues or inconsistencies with the information provided to the Commission.

CHANGE OF OWNERSHIP 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. The licensee and proposed parties may now effectuate the approved change.
2. The licensee shall notify the Commission when the change has occurred.
3. The licensee shall submit a change of name request following this approval if any business or doing-business-as names associated with the license(s) will require modification.
4. The licensee is subject to inspection to ascertain compliance with Commission regulations.
5. The licensee shall remain suitable for licensure.
6. The licensee shall cooperate with and provide information to Commission staff.
7. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) and/or 935 CMR 501.105(1) after effectuating the change, if applicable, and shall give Commission staff 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.



Temescal Wellness of Massachusetts, LLC 0338-COO-02-1225

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Licensee Business Name:	Temescal Wellness of Massachusetts, LLC
Licensee d/b/a Name:	n/a
Establishment Address:	10 Callahan Drive, Pittsfield, MA 01201; 665 Cochituate Road, Suite 1B, Framingham, MA 01701; 252 Coolidge Street, Hudson, MA 01749; and 141 SW Cutoff, Worcester, MA 01604;
SEP or EEA?	No

2. License(s) Affected by this Change Request:

License Number	License Type
MR281588	Marijuana Retailer
MR282033	Marijuana Retailer
MR281309	Marijuana Retailer
MP281402	Marijuana Product Manufacturer
MME705	Medical Marijuana Treatment Center
MME985	Medical Marijuana Treatment Center
MME965	Medical Marijuana Treatment Center

3. The licensee has paid the applicable fees for this change request.

4. Current Person(s) who have Direct or Indirect Control:

Individual	Role	Ownership Percentage	Control Percentage
Edward Rebholz	Person with Direct or Indirect Control	36.5	0
Gerald Lindenmuth	Person with Direct or Indirect Control	15	20



Gary Pieringer	Person with Direct or Indirect Control	2.2	20
Edward Rebholz, Sr.	Person with Direct or Indirect Control	12	20
Kristopher Krane	Person with Direct or Indirect Control	0	20
David Carver	Person with Direct or Indirect Control	0.6	20
David Billitier	Person with Direct or Indirect Control	0	0

5. Current Entity(ies) who have Direct or Indirect Control:

Entity	Role	Ownership Percentage	Control Percentage
Temescal Wellness of Massachusetts Holdings, LLC	Entity with Direct or Indirect Control	100	100
Temescal Wellness, LLC	Entity with Direct or Indirect Control	0	41

6. The licensee proposes adding the following as Entities Having Direct or Indirect Control:

Entity	Role	Proposed Ownership Acquired (%)
Inferno Products LLC	Entity with Direct or Indirect Control	100

7. Background checks were conducted on all proposed parties within and no suitability issues were discovered.
8. Based on Commission information, the proposed parties do not exceed any ownership or control limits over any license type.
9. The proposed parties do not hold any ownership or control interests in any other Commission-issued licenses.
10. Commission staff conducted an organizational and financial inspection into the parties associated with this request and found no issues or inconsistencies with the information provided to the Commission.

CHANGE OF OWNERSHIP 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.

COO Executive Summary 2



1. The licensee and proposed parties may now effectuate the approved change.
2. The licensee shall notify the Commission when the change has occurred.
3. The licensee shall submit a change of name request following this approval if any business or doing-business-as names associated with the license(s) will require modification.
4. The licensee is subject to inspection to ascertain compliance with Commission regulations.
5. The licensee shall remain suitable for licensure.
6. The licensee shall cooperate with and provide information to Commission staff.
7. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) and/or 935 CMR 501.105(1) after effectuating the change, if applicable, and shall give Commission staff 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.



686 Cultivation, LLC

MC283899

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	686 Cultivation, LLC
Licensed Location:	686 Clark Road, Tewksbury, MA 01876

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

License Type(s) Sought:
Marijuana Cultivator, Tier 2, Indoor (5,001 – 10,000 sq. ft.)

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

Type	Status	Location
Marijuana Product Manufacturing	Provisional License	Tewksbury

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
Jeffrey Derby	Person Having Direct/Indirect Control / Capital Contributor	50%	50%
Michael Saccone	Person Having Direct/Indirect Control / Capital Contributor	50%	50%

5. List of all required entities and their roles:

No other entity appears to have ownership or control over this license applicant business.

LICENSING OVERVIEW

6. The licensee was approved for provisional licensure for the above-mentioned license(s) on April 11, 2024.

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7. The licensee has paid all applicable license fees.
8. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
9. 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

10. Commission staff inspected the licensee's facility on the following date(s): June 17, 2026.
11. 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.
12. 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.
13. 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. Transportation

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

FINAL LICENSE CONDITIONS

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

1. The licensee may cultivate, harvest, possess, 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.



ACMJ, Inc.
MC283322

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	ACMJ, Inc.
Licensed Location:	532 Main Street, Holyoke, MA 01040

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

License Type(s) Sought:
Marijuana Cultivator, Tier 1, Indoor (up to 5,000 sq.ft.)

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

Type	Status	Location
Marijuana Product Manufacturing	Provisionally Approved	Holyoke
Marijuana Product Manufacturing	Application Submitted	Holyoke

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
Steven Fontana	Person Having Direct/Indirect Control / Capital Contributor	30%	30%
William Monaghan	Person Having Direct/Indirect Control / Capital Contributor	30%	30%

5. List of all required entities and their roles:

Entity	Role	Ownership Percentage	Control Percentage
Indigold, LLC	Entity Having Direct/Indirect Control / Capital Contributor	30%	30%



LICENSING OVERVIEW

6. The licensee was approved for provisional licensure for the above-mentioned license(s) on June 17, 2021.
7. The licensee has paid all applicable license fees.
8. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
9. 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

10. Commission staff inspected the licensee's facility on the following date(s): May 26, 2026.
11. 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.
12. 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.
13. 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. Transportation

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

FINAL LICENSE CONDITIONS

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

1. The licensee may cultivate, harvest, possess, 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.



Cedar Roots, LLC

MP281872

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Cedar Roots, LLC
Licensed Location:	50 East Main Street, Ware, MA 01082

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

License Type(s) Sought:
Marijuana Product Manufacturer

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

Type	Status	Location
Marijuana Cultivator, Tier 1/Indoor (up to 5,000 sq. ft.)	Commence Operations	Ware

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
Christina McCue	Person Having Direct/Indirect Control / Capital Contributor	13%	25%
Kyle Stevens	Person Having Direct/Indirect Control / Capital Contributor	12%	25%
Frederick Lotuff	Person Having Direct/Indirect Control / Capital Contributor	37%	25%
Mary Feeny	Person Having Direct/Indirect Control / Capital Contributor	38%	25%

5. List of all required entities and their roles:

No other entity appears to have ownership or control over this license applicant business.

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LICENSING OVERVIEW

6. The licensee was approved for provisional licensure for the above-mentioned license(s) on October 8, 2020.
7. The licensee has paid all applicable license fees.
8. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
9. 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

10. Commission staff inspected the licensee's facility on the following date(s): June 15, 2026.
11. 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.
12. 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.
13. 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. 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.

d. Transportation

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

FINAL LICENSE CONDITIONS

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

1. The licensee may 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.



Core Empowerment, LLC

MR285081

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Core Empowerment, LLC
Licensee d/b/a Name:	Seed
Licensed Location:	500 Medford Street, Somerville, MA 02145

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 Retail	Commence Operations	Boston

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
April Arrasate	Person Having Direct/Indirect Control / Capital Contributor	46.36%	46.36%

5. List of all required entities and their roles:

No other entity appears to have ownership or control over this license applicant business.

LICENSING OVERVIEW

6. The licensee was approved for provisional licensure for the above-mentioned license(s) on June 12, 2025.
7. The licensee has paid all applicable license fees.

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8. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
9. 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

10. Commission staff inspected the licensee's facility on the following date(s): June 30, 2026.
11. 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 as applicable.
12. 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.
13. 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. 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.

d. Transportation

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

FINAL LICENSE CONDITIONS

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

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.



Great Northern Wellness, LLC

MR285477

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Great Northern Wellness, LLC
Licensed Location:	180 Elm Street, Unit E, Pittsfield, MA 01201

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.

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
James Bronson	Person Having Direct/Indirect Control / Capital Contributor	100%	100%

5. List of all required entities and their roles:

No other entity appears to have ownership or control over this license applicant business.

LICENSING OVERVIEW

6. The licensee was approved for provisional licensure for the above-mentioned license(s) on March 26, 2026.
7. The licensee has paid all applicable license fees.



8. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
9. 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

10. Commission staff inspected the licensee's facility on the following date(s): July 21, 2026.
11. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.10] through 935 CMR 500.160 as applicable.
12. 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.
13. 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. 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.

d. Transportation

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

FINAL LICENSE CONDITIONS

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

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.



Mellow Tiger, LLC

MR285096

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Mellow Tiger, LLC
Licensee d/b/a Name:	Mellow Tiger Cannabis Company
Licensed Location:	67 Central Street, Southbridge, MA 01550

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.

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
Michael Gwynn	Person Having Direct/Indirect Control / Capital Contributor	40%	70%
Andrew Boles	Person Having Direct/Indirect Control / Capital Contributor	29%	30%

5. List of all required entities and their roles:

Entity	Role	Ownership Percentage	Control Percentage
Erbaccia LLC	Entity Having Direct/Indirect Control / Capital Contributor	30%	0%



LICENSING OVERVIEW

6. The licensee was approved for provisional licensure for the above-mentioned license(s) on January 15, 2026.
7. The licensee has paid all applicable license fees.
8. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
9. 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

10. Commission staff inspected the licensee's facility on the following date(s): July 16, 2026.
11. 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.
12. 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.
13. 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. 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.

d. Transportation

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

FINAL LICENSE CONDITIONS

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

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.



Porter Square Remedies, LLC
MR284796

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Licensee Business Name:	Porter Square Remedies, LLC
Licensee d/b/a Name:	CannaDeli
Licensed Location:	1908 Massachusetts Avenue, Cambridge, MA 02140

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.

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
Laxmi Pradhan	Person Having Direct/Indirect Control / Capital Contributor	100%	51%

5. List of all required entities and their roles:

Entity	Role	Ownership Percentage	Control Percentage
Cambridge Gardens LLC	Entity Having Direct/Indirect Control / Capital Contributor	0%	49%

LICENSING OVERVIEW



6. The licensee was approved for provisional licensure for the above-mentioned license(s) on November 9, 2023.
7. The licensee has paid all applicable license fees.
8. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
9. 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

10. Commission staff inspected the licensee's facility on the following date(s): December 4, 2025, April 28, 2026, and July 22, 2026.
11. 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 as applicable.
12. 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.
13. 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. 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.

d. Transportation

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

FINAL LICENSE CONDITIONS

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

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.



GodsendHP, Inc.

MRN285437

APPLICATION OF INTENT REVIEW

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

License Applicant Business Name:	GodsendHP, Inc.
Proposed Location:	4R General Edwards Hwy, Sharon, MA 02067

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	Ownership Percentage	Control Percentage
George Lang	Person Having Direct/Indirect Control / Capital Contributor	90%	90%
David Wluka	Person Having Direct/Indirect Control / Capital Contributor	10%	10%

5. List of all required entities and their roles:

No other entity appears to have ownership or control over this license applicant business.

6. License Applicant's Status:

General Applicant



7. The license applicant and host community executed a Host Community Agreement (“HCA”) on December 18, 2025. 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 June 29, 2026 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 proposed hiring 50% of individuals from the following Commission identified Areas of Disproportionate Impact: Brockton
2	The license applicant proposed to engage with at least one (1) SE-owned ancillary business and one (1) SE-owned operating licensee.

BACKGROUND CHECK REVIEW

10. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
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 proposed hiring the following: 40% Women, 20% People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, 10% Veterans, 10% Persons with Disabilities, and 10% LGBTQ+ People.
2	The license applicant proposed to engage with at least one (1) diverse supplier owned by women, veterans, people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people; LGBTQ+ individuals, or persons with disabilities, representing a minimum of twenty percent (20%) of total supplier engagements within the first year of operation.

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.



Grateful Delivery, LLC

DOA100192

APPLICATION OF INTENT REVIEW

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

License Applicant Business Name:	Grateful Delivery, LLC
Proposed Location:	723 Washington St, Quincy, MA 02169

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

License Type(s) Sought:
Marijuana Courier

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. The license applicant was pre-certified by the Commission on April 18, 2025. Pursuant to 935 CMR 500.101(2)(b)(2), the applicant demonstrated a propensity to successfully operate a license.

5. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Ownership Control
Matthew Little	Person Having Direct/Indirect Control	51%	51%
Ronald Affsa	Person Having Direct/Indirect Control	25%	25%
Martin Egan	Person Having Direct/Indirect Control	24%	24%

6. List of all required entities and their roles:

No other entity appears to have ownership or control over this license applicant business.

7. License Applicant's Status:

Expedited Applicant (Social Equity Program Participant)

Provisional License Executive Summary 1



Matthew Little / 51% / SE307025)

8. The license applicant and host community executed a Host Community Agreement (“HCA”) on December 31, 2025. The license applicant submitted or resubmitted their application on or after March 1, 2024 and provided a compliant HCA Waiver that was certified by Commission staff pursuant to 935 CMR 500.180(3) and/or comparable medical regulations.
9. The Commission received a municipal response from the host community on July 28, 2026 stating the applicant was in compliance with all local ordinances or by-laws.
10. The license applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	The license applicant proposes to hire 25% of individuals from the following Commission identified Areas of Disproportionate Impact: Quincy and/or MA Residents with Parents or Spouses with Past Drug Convictions.
2	The license applicant proposed to donate \$1,000.00 to The Recovered Souls Foundation.

BACKGROUND CHECK REVIEW

11. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
12. There were no concerns arising from background checks on the individuals or entities associated with the application.

MANAGEMENT AND OPERATIONS PROFILE REVIEW

13. 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.
14. The license applicant proposed the following goals for its Diversity Plan:

#	Goal
1	The license applicant proposed to hire the following: 35% Women, 10% People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, 5% Veterans, 5% Persons with Disabilities, and 15% LGBTQ+ People.
2	Foster a workplace culture that is inclusive, respectful, and supportive, with a focus on employee retention and engagement.
3	The license applicant proposed to partner with suppliers owned/managed by 35% women, 10% People of color, particularly Black, African American, Hispanic, Latinx,



	and Indigenous peoples, 5% Veterans, 5% People with Disabilities, 15% LGBTQ+-owned businesses.
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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.



Hardwick Mill Greenery, Inc.

MPN282387

APPLICATION OF INTENT REVIEW

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

License Applicant Business Name:	Hardwick Mill Greenery, Inc.
Proposed Location:	94 Main St., Hardwick, MA 01031

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

License Type(s) Sought:
Marijuana Product Manufacturer

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

Type	Status	Location
Marijuana Cultivator, Tier 3/Indoor (10,001 – 20,000 sq. ft.)	Provisional License	Hardwick

4. List of all required individuals and their roles:

Individual	Role
George Lang	Person Having Direct/Indirect Control / Capital Contributor

5. List of all required entities and their roles:

No other entity appears to have ownership or control over this license applicant business.

6. License Applicant's Status:

General Applicant

7. The license applicant and host community executed a Host Community Agreement ("HCA") on April 28 2025 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.

Provisional License Executive Summary 1



8. The Commission sent a municipal notice with a copy of the application to the host community on April 7, 2026. The Commission did not receive a response within 60 days pursuant to 935 CMR 500.102(1)(d).
9. The license applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	The license applicant proposed to hire 50% of individuals from the following Commission identified Areas of Disproportionate Impact: Holyoke and Amherst.
2	The license applicant proposed to engage with at least one (1) SE-owned ancillary business annually and on SE owned operating licensee.

BACKGROUND CHECK REVIEW

10. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
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 proposed to hire the following: 40% Women, 20% People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, 10% Veterans, 10% Persons with Disabilities, and 10% LGBTQ+ People.
2	The license applicant proposed to engage with at least one (1) diverse supplier owned by women, veterans, people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people; LGBTQ+ individuals, or persons with disabilities, representing a minimum of twenty percent (20%) of total supplier engagements within the first year of operation.

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.



M1 Enterprises, LLC

MCN284013

APPLICATION OF INTENT REVIEW

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

License Applicant Business Name:	M1 Enterprises, LLC
Proposed Location:	1 Industrial Road, Milford, MA 01757

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

License Type(s) Sought:
Marijuana Cultivator, Tier 3, Indoor, (10,001 – 20,000 sq. ft.)

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

Type	Status	Location
Marijuana Cultivator, Tier 2/Indoor (5,001 – 10,000sq. ft.)	Commence Operations	Milford
Marijuana Product Manufacturing	Commence Operations	Milford

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
John Rogue	Person Having Direct/Indirect Control	33.33%	33.33%
Matthew Radebach	Person Having Direct/Indirect Control	33.33%	33.33%
Carl Boisvert	Person Having Direct/Indirect Control	33.33%	33.33%

5. List of all required entities and their roles:

No other entity appears to have ownership or control over this license applicant business.



6. License Applicant's Status:

General Applicant

7. The license applicant and host community executed a Host Community Agreement ("HCA") on December 14, 2025. 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 July 8, 2026 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 proposed to hire 70% of individuals from the following Commission identified Areas of Disproportionate Impact: Walpole, Mansfield, and census tracts of Worcester, Economic Empowerment Priority Applicants, Social Equity Participants, MA Residents with Past Drug Convictions, and/or MA Residents with Parents or Spouses with Past Drug Convictions.
2	The license applicant proposed contracting and engaging with 25% of suppliers, vendors, contractors, and wholesale partners from the following Commission identified Areas of Disproportionate Impact: Walpole, Mansfield, and census tracts of Worcester, Economic Empowerment Priority Applicants, Social Equity Participants, MA Residents with Past Drug Convictions, and/or MA Residents with Parents or Spouses with Past Drug Convictions.

BACKGROUND CHECK REVIEW

10. There are no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
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
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1	The license applicant proposed hiring the following: 20% Women, 20% People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, 20% Veterans, 20% Persons with Disabilities, and 20% LGBTQ+ People.
2	The license applicant proposed to engage with at least 10% of suppliers who are women, veteran, people of color, particularly Black, African American, Latinx and Indigenous people, LGBTQ+, or disabled-owned businesses within the first year of operation.
3	The license applicant proposed to have 100% of staff take job satisfaction surveys annually, or upon exit, and with a 75% or greater satisfaction regarding inclusivity in the workplace.
4	The license applicant proposed to implement an employee promotion goal where at least 50% of the employees who receive promotions within our first year of operations are Women, People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, Veterans, Persons with Disabilities, and LGBTQ+ People.

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.



Pioneer Valley Trading Company, Inc.

MCN284021

MCN284022

MPN282390

APPLICATION OF INTENT REVIEW

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

License Applicant Business Name:	Pioneer Valley Trading Company, Inc.
Proposed Location:	34 Granville Road, Southwick, MA 01077

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

License Type(s) Sought:
Marijuana Cultivator, Tier 2, Indoor, (5,001 – 10,000 sq. ft.)
Marijuana Cultivator, Tier 6, Outdoor, (40,001 – 50,000 sq. ft.)
Marijuana Product Manufacturing

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

Type	Status	Location
Marijuana Retail	Commence Operations	Westfield
Marijuana Retail	Commence Operations	Southwick

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
Michael Albert	Person Having Direct/Indirect Control	41%	41%
Richard Fiore	Person Having Direct/Indirect Control	32.08%	32.08%

5. List of all required entities and their roles:

No other entity appears to have ownership or control over this license applicant business.

Provisional License Executive Summary 1



6. License Applicant's Status:

General Applicant (MCN284021) (MPN282390)
Expedited Applicant (License Type) (MCN284022)

7. The license applicant and host community executed a Host Community Agreement ("HCA") on March 9, 2026. 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 July 20, 2026 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 proposed to hire 50% of individuals from the following Commission identified Areas of Disproportionate Impact: West Springfield
2	The license applicant proposed to collaborate with at least one (1) SE-owned ancillary business and one (1) SE-owned operating licensee

BACKGROUND CHECK REVIEW

10. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
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 proposed to hire the following: 50% Women, 20% People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, 10% Veterans, 10% Persons with Disabilities, and 10% LGBTQ+ People.
2	The license applicant proposed to engage with at least one (1) diverse supplier owned by Women, veterans, People of color, particularly Black, African American, Hispanic,



	Latinx, and Indigenous peoples, Veterans, Persons with Disabilities and LGBTQ+-owned businesses.
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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.



Route 133 Cannabis, LLC

MRN285509

APPLICATION OF INTENT REVIEW

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

License Applicant Business Name:	Route 133 Cannabis, LLC
Proposed Location:	1625 Andover Street, 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 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	Ownership Percentage	Control Percentage
Dean Graffeo	Person Having Direct/Indirect Control	100%	100%
Jonathan Miller	Person Having Direct/Indirect Control	0%	0%

5. List of all required entities and their roles:

Entity	Role	Ownership Percentage	Control Percentage
Elevation Kind, LLC	Entity Having Direct/Indirect Control /Capital Resources	0%	0%
Rivercliff Holdings, LLC	Entity Having Direct/Indirect Control	0%	0%

Provisional License Executive Summary 1



6. License Applicant's Status:

General Applicant

7. The license applicant and host community executed a Host Community Agreement ("HCA") on December 17, 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 June 29, 2026 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 proposed hiring 20% of individuals from the following Commission identified Areas of Disproportionate Impact: census tracts of Lowell

BACKGROUND CHECK REVIEW

10. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
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 proposed to hire the following: 50% Women, 30% People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, veteran, persons with a disability or persons who are LGBTQ+. Of this 30% our goal is to have 70% be People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, 5-10% Veteran, 5-10% Persons with disabilities and 5-10% be persons who are LGBTQ+.



2	The license applicant proposed to contract with 30% of suppliers, contractors, and wholesale partners who are Women, People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, Veteran, Persons with a disability or LGBTQ+-owned businesses
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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.



Westfield Ultra Premium, LLC

RMDA4445

APPLICATION OF INTENT REVIEW

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

License Applicant Business Name:	Westfield Ultra Premium, LLC
License Applicant d/b/a Name:	Westfield Ultra Premium
Proposed Cultivation Location:	98 Sgt TM Dion Way, Westfield, MA 01085 (Tier 4/Indoor, 20,001-30,000 sq. ft.)
Proposed Manufacturing Location:	98 Sgt TM Dion Way, Westfield, MA 01085
Proposed Dispensary Location:	98 Sgt TM Dion Way, Westfield, MA 01085

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

Type	Status	Location
Marijuana Cultivator, Tier 4/Indoor (20,001 – 30,000 sq. ft.)	Provisional License	Westfield
Marijuana Product Manufacturing	Provisional License	Westfield
Marijuana Retail	Provisional License	Westfield

4. List of all required individuals and their roles:

Individual	Role	Ownership Percentage	Control Percentage
Adenike John	Person Having Direct/Indirect Control	51%	51%
Wayne Shaffer	Person Having Direct/Indirect Control	24.5%	24.5%
Stephen Berardino	Person Having Direct/Indirect Control / Capital Contributor	24.5%	24.5%



5. List of all required entities and their roles:

No other entity appears to have ownership or control over this license applicant business.

6. License Applicant's Status:

General Applicant

7. license applicant and host community executed a Host Community Agreement ("HCA") on October 1, 2025. 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 sent a municipal notice with a copy of the application to the host community on May 11, 2026. The Commission did not receive a response within 60 days pursuant to 935 CMR 501.102(1)(d).
9. The license applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	The license applicant proposed to donate \$5,000 annually in charitable contributions to the West Springfield VFW Post #6814.

BACKGROUND CHECK REVIEW

10. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
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 proposed to hire the following: 50% Women, 20% People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples, 10% Veterans, 10% Persons with Disabilities, and 10% LGBTQ+ People.



2	The license applicant proposed to provide one (1) annual cultural training on cultural sensitivity and recognizing unconscious bias, focusing on materials including learning about multicultural environments, how to foster inclusion and belonging, intercultural competence, and break out group sessions.
3	The license applicant proposed to contract with 20% of contracts with businesses that are majority-owned or managed by women; 30% of all contracts with businesses that are majority-owned or managed by People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous peoples; 50% of all contracts with businesses that are majority-owned or managed by veterans; majority-owned or managed by persons with disabilities as well as those who identify as LGBTQ+.

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.



Memorandum

To: Chair Christopher Harding, Commissioner Anthony Wilson, Commissioner
Xiomara Delobato
From: Executive Director Travis Ahern
Date: August 12, 2026
Subject: Tier Expansion Requests Under

Background: 935 CMR 500.050(2)(c) governs Tier Expansion for licensed Marijuana Cultivators, including the requirements and thresholds a cultivator must meet before requesting expansion to a higher cultivation tier. Generally, cultivators in compliance with the CCC who demonstrate sales of cultivated product over 85% are able to request Tier Expansion, and if approved, increase their licensee fee under the fee schedule to the new tier, once approved.

Problem Statement: Given the Commission's approval on July 9, 2026, of a cultivation freeze, which included various carve outs for equity businesses, the Executive Director is seeking direction from the Commissioners at the August 13, 2026, Public Meeting on whether Tier Expansion requests should be considered in normal course.

Specifically, two requests are currently eligible under 935 CMR 500.050(2)(c) for Executive Director approval, but have been held for direction from the Commissioners:

Caregiver-Patient Connection LLC d/b/a Local Roots

Submitted the application on June 15, 2026.

MC281254

Current Operations: Tier 5/Outdoor (30,001 – 40,000 sq. ft.)

Requested Operations: Tier 8 Outdoor (60,001 – 70,000 sq. ft)

295 Vernon Avenue., Barre, MA 01005

Nova Farms, LLC

Submitted the application on July 14, 2026.

MC281841

Current Operations: Tier 10 Outdoor (80,001 – 90,000 sq. ft.)

Requested Operations: Tier 11/Outdoor (90,001 – 100,000 sq. ft)

136 Kellogg Road, Sheffield, MA 01257



Request: Direction from the Commissioners that either (1) Tier Expansion requests should be held in abeyance during the 4-month cultivation freeze (July to October 2026), or (2) Tier Expansion requests should be considered based on compliance with 935 CMR 500.050(2)(c).



Emergency Regulation Policy Questions Post Public Comment

Ch. 65, § 36: License Cap Exemption and Ownership and Control (Equity interest of less than 20%)

1. Whether to remove all amendments related to § 36 from the final emergency regulation package, but continue to work through policy considerations to implement § 36, specifically, the criteria to determine "direct and indirect control", in the Fall Regulatory Round to clarify exactly which persons or entities are eligible for the license cap exemption?
2. Whether to keep the emergency regulations as drafted, where equity has been interpreted to encompass only a financial/economic interest, but not a voting interest, so long as the person or entity does not otherwise have direct or indirect control?
3. Whether to amend the emergency regulations to reflect that equity has been interpreted to encompass both a financial/economic interest and a voting interest, so long as the person or entity does not otherwise have direct or indirect control?

Ch. 65 Sections for Consideration

SECTION 36. Said chapter 94G is hereby further amended by striking out section 16, as so appearing, and inserting in place thereof the following section:-

Section 16. (a) No licensee shall be granted more than 6 marijuana retailer licenses, 3 fully integrated medical marijuana treatment center licenses, 3 marijuana product manufacturer licenses or 3 marijuana cultivator licenses; provided, however, that a licensee may hold 6 marijuana retailer licenses, 3 fully integrated medical marijuana treatment center licenses, 3 marijuana product manufacturer licenses and 3 marijuana cultivator licenses; and provided further, that a licensee that holds 3 fully integrated medical marijuana treatment center licenses shall not hold any additional medical marijuana establishment licenses established by the commission pursuant to section 7 of chapter 94I.

(b) The limitations of subsection (a) shall not apply to: (i) a person functioning solely as a trustee during or after the sale of a marijuana establishment or medical marijuana establishment to a licensee's employees through an employee stock ownership plan as defined in section 407(d)(6) of the Employee Retirement Income Security Act of 1974, 29 U.S.C. 1107(d)(6); or **(ii) a person or entity that possesses a financial interest in the form of equity in a license of less than 20 per cent; provided, however, that such person or entity does not otherwise have direct or indirect control over the operations of a license.**

SECTION 24. Subsection (a ½) of said section 4 of said chapter 94G, as so appearing, is hereby amended by striking out clauses (xxxvii) and (xxxviii) and inserting in place thereof the following 4 clauses:-

(xxxvii) procedures and policies for host communities to promote and encourage full participation in the regulated marijuana industry, pursuant to paragraph (5) of subsection (d) of section 3, during negotiations of host community agreements with social equity businesses, including, but not limited to, advisory guidelines, best practices and minimum acceptable policy standards;

(xxxviii) procedures and policies for the commission to provide the department of revenue with a list of businesses that qualify as social equity businesses to facilitate the department of revenue's timely certification of the amounts required to be distributed, credited and paid to cities and towns pursuant to section 5 of chapter 64N;

(xxxix) equivalency and conversion standards for marijuana products pursuant to subsection (a) of section 7, provided; however, that such standards shall consider potency and form; and

(xl) criteria for determining whether a person or entity has direct or indirect control over a license pursuant to subsection (b) of section 16.

Fall Regulatory Round Policy Questions for August 13 Public Meeting:

Advertising/Discounts/Loyalty Programs:

1. Whether to allow licensees the ability to permit advertising, marketing, and branding of sales, discounts and customer loyalty programs within an ME/MME or through an opt-in email list? [Chapter 65 § 21]
2. Whether to allow advertising “*within*” and ME and MME’s by allowing this type of communications on ME’s/MME’s websites? [Chapter 65 § 21]

Delivery – Municipal Opt Out:

3. Whether municipal waivers occur after the initial two-year period required by the new law? [Chapter 65 § 25]

Authorizing Sale of Marijuana Seeds:

4. Whether to allow MEs or MMEs to sell marijuana seeds? [Chapter 65 § 12]

State-wide Industry License Caps:

5. Whether to limit the total number of licenses in both adult-use and medical-use programs overall? Or whether to expressly promulgate regulations that state that the Commission may limit the total number of licenses in each license type and class? [Chapter 65 § 19]

Transporter Revision:

6. Whether to combine the two transporter licenses into one Marijuana Transporter License? [Not Chapter 65]

Island Transportation:

7. Whether to incorporate Executive Order Number 3 into the regulations? [Not Chapter 65]

Agent Registration:

8. Whether to amend agent registration license to be agent-centric and portable across employers and licenses or to keep the current allowance for the same badge for agents working for persons or entities with direct and indirect control. [Not Chapter 65]
9. Whether to align or amend ME and MME agent fees? [Not Chapter 65]

RVT:

10. Whether to amend the annual training requirement? [Not Chapter 65]

Enforcement:

11. Whether to amend notice of deficiency regulations to state that the Commission "may" issue as opposed to "shall" issue to align with other enforcement actions in regulation? [Not Chapter 65]

From: Anthony Wilson, Commissioner
To: The Cannabis Control Commission
Date: August 7, 2026
Subject: Recommendation for the removal of certain Regulation

Each provision below is tested against four primary factors. A provision need not fail all four to warrant removal; failing even one or two may be enough where the compliance burden is real and the public benefit is thin.

1. No analogous requirement in a comparable regulated industry.

Alcohol (governed by the Alcoholic Beverages Control Commission under 204 CMR) and pharmacy (governed by the Board of Registration in Pharmacy under 247 CMR, layered over the federal controlled-substance rules) are the natural comparators: each governs a commercially available product with real potential for harm, diversion, and sale to minors, and each has regulated its market successfully for decades. Where those regimes impose no comparable requirement, that absence is evidence that our requirement is not essential to safe operation.

2. The policy goal is better achieved or enforced by another authority.

Some goals embedded in our rules are already owned by an agency with deeper expertise and existing enforcement machinery: the local building inspector for the State Building Code, the Department of Environmental Protection for waste and water, the municipality for land use and foliage, and the Department of Labor Standards for workplace safety. Duplicating those mandates inside 935 CMR 500.000 adds a second, less-expert enforcer without adding protection.

3. Licensees are already independently incentivized to achieve the goal.

Where a licensee's own commercial self-interest, its insurer's requirements, or ordinary market pressure already drive the desired behavior (robust cash handling, functioning security equipment, energy efficiency in an energy-intensive business), a mandate is largely redundant and mostly serves to create a technical violation to cite.

4. The substance is already covered elsewhere.

A number of provisions restate a duty already imposed by another subsection of 935 CMR 500.000 or by another CMR. Redundant text is not harmless: it multiplies the number of ways an operator can be found non-compliant for a single underlying lapse.

Additional cross-cutting principles

Proportionality to risk. Requirements should scale to demonstrated risk. Our transport and premises-security mandates are, in several places, stricter than what the Commonwealth asks of pharmacies handling Schedule II opioids; a difficult proportionality to defend on public-safety grounds.

Enforceability and monitoring. A rule the Commission neither monitors nor can practically monitor (route randomization is the clearest example) burdens the compliant while doing little, and invites arbitrary or selective enforcement. Unenforceable rules also erode respect for the rules that matter.

Barriers to entry and equity. Fixed compliance costs are regressive: they fall hardest on small cultivators, microbusinesses, and social-equity licensees. Removing low-value fixed costs directly advances the equity goals the Commission is statutorily charged with promoting.

Performance over prescription. Where a goal is legitimate, a performance standard ("secure the premises," "limit access to authorized personnel") is almost always preferable to a design mandate ("a 12-inch-by-12-inch sign," "two agents per vehicle," "36 watts per square foot"). Several provisions below can be made performance-based rather than repealed.

Beware requirements that only compel "consideration." Several provisions require an applicant merely to "demonstrate consideration" of a topic. Such language produces unfalsifiable paperwork, cannot meaningfully be failed or passed, and is a poor condition of licensure. These are among the easiest provisions to remove without any loss of substantive protection.

<i>Regulation</i>	<i>Rationale</i>
500.101(1)(c)(8) A detailed summary of operating policies and procedures for the Marijuana Establishment which shall include, but not be limited to, provisions for: a. Security; b. Prevention of Diversion and Inversion; c. Storage of Marijuana; d. Transportation of Marijuana; e. Inventory procedures; f. Procedures for quality control and testing of product for potential contaminants; g. Personnel policies; h. Dispensing procedures; i. Recordkeeping procedures; j. Maintenance of financial records; and k. Diversity plans to promote equity among	There is no similar provision for pharmacies or alcoholic beverages. Except for “k” all of these documents are required prior to operation. See 500.105. This section applies to the initial application. Based on information from the Licensing Division, the current requirement compels applicants to submit lengthy documents outlining their plans rather than an actual Standard Operating Procedure (SOP), which most applicants have not yet developed at this stage of the process. As a result, Licensing routinely receives long restatements of CCC regulations, in which applicants write phrases such as "My establishment will adhere to..." followed by an enumeration of the required regulations. This provides no meaningful benefit, as it merely reproduces existing regulatory language without demonstrating operational readiness. *Recommend relocating subsection "k" to Section 500.105 so that diversity plans are required prior to operation rather than at initial application.
500.105(1)(n) Policies and procedures for the handling of cash on Marijuana Establishment premises including but not limited to storage, collection frequency, and transport to financial institution(s).	There is no similar provision for pharmacies or alcoholic beverages. Every operator has an overwhelming commercial incentive to handle cash carefully; poor cash controls threaten the business directly. A written-procedure mandate adds little to that incentive (Factor 3). More importantly, detailed cash-handling and cash-transportation security is ALREADY governed in depth by 500.110 (locked safe/vault, cameras on cash areas, incremental deposit process, licensed armored transport, and alternative-safeguard provisions). The written-procedure requirement in (1)(o) is largely subsumed by 500.110 (Factor 4).

500.105(1)(p)

Policies and procedures for energy efficiency and conservation that shall include:

1. Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
2. Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
3. Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
4. Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

There is no similar provision for pharmacies or alcoholic beverages.

The substantive energy-performance obligations for buildings envelope, HVAC, lighting, are already imposed and enforced through Chapter 13 of the State Building Code (780 CMR), the International Energy Conservation Code, and the applicable ASHRAE standards, enforced in every municipality by the local building inspector, who reviews these matters across all building types and is better positioned than the Commission to do so (Factors 2 and 4).

As drafted, the provision does not require any particular outcome; it requires the applicant to identify opportunities and explain why some were not pursued. It compels documented consideration, not efficiency. That makes it a paperwork condition of licensure with no measurable public benefit (cross-cutting principle 5).

500.105(13)(a)(6) All vehicles transporting marijuana products shall be staffed with a minimum of two marijuana establishment agents. At least one agent shall remain with the vehicle at all times that the vehicle contains marijuana or marijuana products.	There is no similar provision for pharmacies or alcoholic beverages. The two-agent mandate roughly doubles the labor cost of every transfer without a demonstrated safety return, and the load is already protected by GPS, in-vehicle cameras, locked compartments, and secure communications (Factors 3 and applicable cross-cutting proportionality). The Commission has ALREADY conceded the point in part: subsections (a)(6)(a)–(b) permit a single agent for testing transport valued at \$5,000 or less. That carve-out shows the two-agent rule is not treated as safety-critical, and supports extending a value- or risk-based threshold to routine transport rather than mandating two agents universally.
500.105(13)(a)(12) A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transportation times and routes are randomized.	There is no similar provision for pharmacies or alcoholic beverages. The Commission does not monitor routing and, as a practical matter, cannot verify randomization. An unmonitored, unverifiable mandate burdens the compliant operator while providing no assurance to anyone (enforceability principle). Loads are GPS-tracked and camera-monitored in real time; a would-be thief's problem is not predictable routing but the tracking and recording that already exist. The marginal security value of randomization is negligible (Factor 3).
500.105(13)(a)(13) A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transport routes remain within the Commonwealth.	There is no similar provision for pharmacies or alcoholic beverages. This restates a constraint already imposed by federal law: transporting marijuana across state lines is a federal offense, and no licensee may lawfully do so regardless of our rule. The provision is therefore redundant of a far stronger legal prohibition (Factor 4). As with (a)(12), the Commission does not track routes and cannot independently verify compliance; the deterrent is federal enforcement, not this subsection.

500.105(15)

Energy Efficiency and Conservation. A marijuana establishment must demonstrate consideration of the following factors as part of its operating plan and application for licensure:

- a) Identification of potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and a plan for implementation of such opportunities;
- b) Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
- c) Strategies to reduce electric demand (such as lighting schedules, active load management, and energy storage); and
- d) Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

There is no similar provision for pharmacies or alcoholic beverages.

This duplicates the building-code regime and, again, requires only demonstrated "consideration" as a licensure condition (Factors 2 and 4).

Maintaining four near-identical energy-"consideration" provisions (105(1)(q), 105(15), 120(11), 130(3)/(5)(e)) invites confusion and multiplies compliance touchpoints for a single policy goal.

500.110(4)(a) All limited access areas must be identified by the posting of a sign that shall be a minimum of 12" x 12" and which states: "Do Not Enter—Limited Access Area—Access Limited to Authorized Personnel Only" in lettering no smaller than one inch in height.	There is no similar provision for pharmacies or alcoholic beverages. The focus should be on actual access, not signage. The remaining paragraphs in this section prohibit access.
500.110(4)(e) All outside vendors, contractors and visitors shall obtain a visitor identification badge prior to entering a limited access area, and shall be escorted at all times by a marijuana establishment agent authorized to enter the limited access area. The visitor identification badge shall be visibly displayed at all times while the visitor is in any limited access area. All visitors must be logged in and out and that log shall be available for inspection by the Commission at all times. All visitor identification badges shall be returned to the Marijuana Establishment upon exit.	There is no similar provision for pharmacies or alcoholic beverages. Facilities are under comprehensive, Commission-accessible video surveillance, and operators already control who enters. The continuous-escort mandate imposes a real staffing cost; an employee pulled off task to shadow every technician or repair vendor.
500.110(5)(f) Trees, bushes and other foliage outside of the Marijuana Establishment shall be maintained so as to prevent a person or persons from concealing themselves from sight.	There is no similar provision for pharmacies or alcoholic beverages. Sightline and landscaping questions are the traditional province of municipal land-use regulation and local inspectional services, which are better placed to enforce them across property types (Factor 2). The provision is vague and effectively unenforced; it adds a subjective standard that a compliant operator can nonetheless be cited under.

500.110(8) Security Audits. A Marijuana Establishment must, on an annual basis, obtain at its own expense, a security system audit by a vendor approved by the Commission. A report of such audit must be submitted, in a form and manner determined by the Commission, no later than 30 calendar days after the audit is conducted. If the audit identifies concerns related to the establishment's security system, the Marijuana Establishment must also submit a plan to mitigate those concerns within ten business days of submitting the audit.	There is no similar provision for pharmacies or alcoholic beverages. The Commission does not maintain a list of approved vendors. This is a significant recurring cost whose value is unproven. The Commission already has extensive real-time visibility into each establishment's security through mandated cameras, alarms, and inspection authority.
500.120(4) All phases of the cultivation, processing, and packaging of marijuana by a Marijuana Cultivator shall take place in a designated area that is not visible from a public place without the use of binoculars, aircraft or other optical aids.	There is no similar provision for pharmacies or alcoholic beverages. The "not visible ... without binoculars [or] aircraft" standard is nearly impossible for outdoor cultivators to satisfy and functions as a de facto barrier to small and outdoor farms; an equity and barrier-to-entry concern the Commission is charged to weigh. Cultivation sites are already fenced, alarmed, and camera-monitored under 500.110(6) (Factors 3 and equity principle). A general "keep product out of plain sight" requirement already exists at 500.110(1)(l); the additional optical-aid/aircraft standard adds cost and absurdity without a corresponding security gain (Factor 4).

500.120(11)

A Marijuana Cultivator shall satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits and other applicable approvals, including those related to water quality and solid and hazardous waste management, prior to obtaining a final license under 935 CMR 500.103(2). A Marijuana Cultivator shall adopt and use additional best management practices as determined by the Commission, in consultation with the working group established under St. 2017, c. 55, § 78(b), to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts, and shall provide energy and water usage reporting to the Commission in a form determined by the Commission. Marijuana Cultivators shall be subject to the following minimum energy efficiency and equipment standards:

- a) The building envelope for all facilities, except greenhouses, must meet minimum Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: State Building Code), International Energy Conservation Code (IECC) Section C.402 or The American Society of Heating, Refrigerating and Air-conditioning Engineers

There is no similar provision for pharmacies or alcoholic beverages.

The building-envelope and HVAC clauses (subsections (a) and (c)) expressly track 780 CMR, IECC, and ASHRAE and are therefore duplicative of the building code (Factor 4).

The aspirational "best management practices" and reporting language is the same demonstrated-consideration paperwork criticized above.

(ASHRAE) Chapters 5.4 and 5.5 as applied or incorporated by reference in 780 CMR: State Building Code, except that facilities using existing buildings may demonstrate compliance by showing that the envelope insulation complies with code minimum standards for Type Factory Industrial F-1, as further defined in guidelines issued by the Commission.

- b) The Lighting Power Densities (LPD) for cultivation space must not exceed an average of 36 watts per gross square foot of active and growing space canopy, but for Tier 1 and Tier 2 a requirement of 50 watts per gross square foot of active canopy or growing unless otherwise determined in guidelines issued by the Commission.
- c) Heating Ventilation and Air Condition (HVAC) and dehumidification systems must meet Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: State Building Code), IECC Section C.403 or ASHRAE Chapter 6 as applied or incorporated by reference in (780 CMR: State Building Code).
- d) Safety protocols must be established and documented to protect

workers and consumers (e.g., eye protection near operating grow light). e) Requirements 935 CMR 500.120(11)(b) and (c) shall not be required if an indoor marijuana cultivator is generating 100% or more of the onsite load from an onsite clean or renewable resource. f) The Commission may further define these standards, or create reasonable exemptions or modifications, through guidelines issued in consultation with the energy and environmental standards working group established under St. 2017, c. 55, § 78(b), including but not limited to provisions for greenhouses and agricultural buildings. g) A RMD with a final certificate of registration before March 15, 2018, shall have a 12 month period to comply with 935 CMR 500.120(11) or until March 23, 2019.	
500.130(3) A Marijuana Product Manufacturer shall satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits and other applicable approvals, including those related to water quality and solid waste disposal, and to use additional best	There is no similar provision for pharmacies or alcoholic beverages. Manufacturing facilities are already subject to the building code and to environmental permitting for water quality and solid-waste disposal, enforced by the building inspector and DEP respectively (Factors 2 and 4). The provision layers a cannabis-specific paperwork obligation on top of those regimes.

management practices as determined by the Commission in consultation with the working group established under St. 2017, c. 55, § 78(b) to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. If minimum standards or best management practices are not established by the time of an application for initial licensure, a Marijuana Product Manufacturer shall satisfy such standards or best management practices as a condition of license renewal, in addition to any the terms and conditions of any environmental permit regulating the licensed activity.	
500.130(5)(e) Policies and procedures to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(15); and	There is no similar provision for pharmacies or alcoholic beverages. This provision exists only to require a written policy that mirrors 500.105(15). If 500.105(15) is repealed, this cross-reference should fall with it; if 105(15) is retained, this remains pure duplication (Factor 4).
500.140(2) On-premises Verification of Identification for Adult Use Only Locations. Upon entry into the premises of a Marijuana Retailer by an individual, a marijuana establishment agent shall immediately inspect the individual's proof of identification and determine the individual's age. An individual shall not be admitted to the premises unless the retailer has verified that the individual is 21 years of age or older by an individual's proof of identification.	There is no similar provision for pharmacies and for alcohol beverages. Requiring a dedicated agent to check identification at the threshold forces operators to staff the door continuously, drives up start-up and build-out costs, and duplicates the age check that already occurs at the point of sale; precisely the model used by alcohol package stores (Factors 1 and 3). Point-of-sale verification is backstopped by mandatory Responsible Vendor Training on checking and confiscating fraudulent identification (500.105(2)); the substantive protection against underage access does not depend on a second, door-side check.

500.140(3)

On-premises Verification of Identification for Colocated Adult Use and Medical Use Locations. Upon entry into the premises of a Marijuana Retailer that is colocated with a RMD by an individual, a marijuana establishment agent shall immediately inspect the individual's proof of identification and determine that the individual is 21 years of age or older. If the individual is younger than 21 years old but 18 years of age or older, he or she shall not be admitted unless they produce an active medical registration card issued by the DPH. If the individual is younger than 18 years old, he or she shall not be admitted unless they produce an active medical registration card and they are accompanied by a personal caregiver with an active medical registration card. In addition to the medical registration card, registered qualifying patients 18 years of age and older and personal caregivers must also produce proof of identification.

There is no similar provision for pharmacies or alcoholic beverages.

For the adult-use side, the same point-of-sale logic in (2) applies, and door-staffing is an equivalent burden.

Memorandum

To: Commissioners

From: Access to Medical Cannabis Working Group

Date: August 13, 2026

Subject: Draft Redline -- 935 CMR 501.000 (Medical Use of Marijuana) – Regulatory Implementation of Ch. 65 of the Acts of 2026: An Act Modernizing the Commonwealth's Cannabis Laws

I. Purpose

This memorandum presents a draft redline of 935 CMR 501.000, the Commission's regulations governing the Medical Use of Marijuana Program. The redline implements changes required by Ch. 65 of the Acts of 2026: An Act Modernizing the Commonwealth's Cannabis Laws, and reflects associated agency policy decisions.

Acronym Definitions:

MMD- Medical Marijuana Dispensary

MTC- Medical Treatment Center

MME – Medical Marijuana Establishment

FIMTC- Fully Integrated Medical Marijuana Treatment Centers

SOP- Standard Operating Procedure

Summary of Key Changes

- ☐ **New Medical Marijuana Dispensary (MMD) license type.** A new dispensary-only license allows entities to purchase, store, dispense, and deliver Medical-use Marijuana without cultivating or manufacturing. This new license type can be co-located with other licenses or a standalone business.
- ☐ **Vertical integration is no longer required.** Existing MTCs are redesignated as Fully Integrated Medical Marijuana Treatment Centers (FIMTC) and may elect which licensed activities to perform. A 36-month conversion pathway allows FIMTCs to convert to an MMD license.
- ☐ **Residency requirement eliminated.** Any person diagnosed with a Debilitating Medical Condition may register as a Qualifying Patient regardless of state residency.
- ☐ **Pediatric certification expanded.** Nurse Practitioners and Physician Assistants may certify pediatric patients with Life-limiting Illnesses, consistent with the existing framework for adult certifications. The specialty requirement is retained.
- ☐ **Institutional care access strengthened.** New ordering authority, on-site administration rules, and three-year renewal structures are established for Caregiving Institutions and Institutional Caregivers.
- ☐ **Certifying Healthcare Provider registry modernized.** Three-year renewal, automatic suspension upon professional license lapse, and an opt-in public provider list are added.

- ❑ **Supply chain integration.** Targeted amendments to 935 CMR 500.000 authorize transfers from adult-use licensees to Medical Marijuana Establishments and allow Marijuana Product Manufacturers to produce and transfer above-cap products exclusively to the medical channel.
- ❑ **Overwater transport codified.** Administrative Order No. 3 (June 2024) governing transport to Dukes County and Nantucket is incorporated into 935 CMR 501.000 with full regulatory force.
- ❑ **Confidentiality.** Research related to medical patients is confidential and will not be disclosed via public records request. Certifying Healthcare Providers may opt in to a publicly available list on the Commission's website.
- ❑ **Conforming amendments.** All references to M.G.L. c. 10, § 76 are updated to M.G.L. c. 6, § 223, with global terminology updates throughout.

The Act requires regulatory action to remove vertical integration as a condition of licensure for Medical Marijuana Treatment Centers. Additional regulatory changes include the elimination of the Massachusetts residency requirement for Qualifying Patients, and amends the certification requirements for pediatric patients with Life-limiting Illnesses to allow two Certifying Healthcare Providers rather than specifically two physicians, provided at least one holds the required specialty (pediatrician, pediatric subspecialist, oncologist, neurologist, or family physician). The redline creates a new Medical Marijuana Dispensary license type and a conversion pathway allowing existing Fully Integrated Medical Marijuana Treatment Center licensees to elect to convert to the MMD license type, both pursuant to the Commission's authority under M.G.L. c. 94I, § 7, and makes conforming and clarifying amendments throughout 935 CMR 501.000.

This redline also includes conforming amendments to 935 CMR 500.000 to authorize transfers from adult-use licensees to Medical Marijuana Establishments and to create a production and transfer carve-out for Marijuana Product Manufacturers supplying above-cap dosing products to the medical channel.

II. Redline Legend

~~Strikethrough red text~~ indicates deleted language.

Underlined blue text indicates new language.

Italic purple text following 'Drafter's Note:' explains the purpose and basis of each change.

III. Proposed Amendments to 935 CMR 501.000

501.001: Purpose

The purpose of 935 CMR 501.000 is to implement ~~St. 2017, c. 55: An Act to Ensure Safe Access to Marijuana; M.G.L. c. 94G and M.G.L. c. 94I.~~ M.G.L. c. 6, § 223, M.G.L. c. 94G, and M.G.L. c. 94I, and to carry out the authority granted to the Commission thereunder.

Drafter's Note: The session law citation (St. 2017, c. 55) is struck. Session laws that amend the MGL are properly cited by their MGL location, not by the session law. The purpose section is updated to reflect the Commission's current statutory homes: M.G.L. c. 6, § 223 (governance, added by Ch. 65), M.G.L. c. 94G, and M.G.L. c. 94I.

501.002: Definitions

[All definitions in the current 501.002 are retained without change unless specifically addressed below.]

Card Holder [AMENDED – Ch. 65 § 38]

~~Card Holder means a registered qualifying patient, personal caregiver, or agent of a medical marijuana treatment center who has been issued and possesses a valid registration card.~~

Card Holder means a Registered Qualifying Patient, Personal Caregiver, Institutional Caregiver, or agent of a medical marijuana establishment who has been issued and possesses a valid registration card.

Drafter's Note: Ch. 65 § 38 updates the statutory definition to replace 'agent of a medical marijuana treatment center' with 'agent of a medical marijuana establishment.' The Commission adds Institutional Caregiver as a regulatory matter, consistent with the IC registration framework established at 935 CMR 501.022 and the Commission's authority to administer registrations under M.G.L. c. 94I. The IC Registration Card issued under 501.022 is a registration card within the meaning of the statute; the definition is elaborated here to confirm ICs are card holders for purposes of the verification framework throughout 935 CMR 501.000.

Caregiving Institution [AMENDED]

~~Caregiving Institution means a hospice program, long-term care facility, or hospital duly registered currently and validly by the Commission, providing care to a Registered Qualifying Patient on the premises of the facility or through a hospice program.~~

Caregiving Institution means a hospice program, long-term care facility, skilled nursing facility, hospital, licensed ambulatory care facility, home health agency, or other entity providing care to a Registered Qualifying Patient, that is duly registered currently and validly by the Commission and authorized by the Commission to provide care on the premises of the facility, at a patient's residence, or through such other care delivery arrangements as the Commission may approve.

Drafter's Note: Expanded to include SNFs, licensed ambulatory care facilities (including oncology infusion centers and community health centers), and home health agencies. 'At a patient's residence' added for home-based care. The 'other entity' catch-all requires Commission vote for initial registration per 935 CMR 501.038(3); enumerated facility types are ministerial.

Cultivation Registration [AMENDED – Ch. 65 § 40]

~~Cultivation Registration means a registration issued to a medical marijuana treatment center to grow medical use marijuana under the terms of M.G.L. c. 94I, or to a qualified patient or personal caregiver.~~

Cultivation Registration means a registration issued to a medical marijuana establishment to grow medical use marijuana under the terms of M.G.L. c. 94I, or to a qualified patient or personal caregiver.

Executive Director [NEW]

Executive Director means the Executive Director of the Cannabis Control Commission, appointed pursuant to M.G.L. c. 6, § 223(i)(1).

Drafter's Note: Ch. 65 relocated the Commission to M.G.L. c. 6 and established the Executive Director by statute. Definition anchors the term throughout 935 CMR 501.000 where the ED is assigned specific ministerial and operational authorities.

Fully Integrated Medical Marijuana Treatment Center [NEW – Ch.65 § 41]

Fully Integrated Medical Marijuana Treatment Center means an entity licensed under 935 CMR 501.000 to elect and perform any combination of the following licensed activities: cultivating Marijuana; manufacturing and processing Marijuana Products; and dispensing and delivering Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions. A Fully Integrated Medical Marijuana Treatment Center may purchase or obtain Marijuana and Marijuana Products from other Medical Marijuana Establishments and from Marijuana Establishments licensed under 935 CMR 500.000. A Fully Integrated Medical Marijuana Treatment Center may Transfer Medical-use Marijuana to other Medical Marijuana Establishments. A Fully Integrated Medical Marijuana Treatment Center is not required to simultaneously perform all licensed activities as a condition of licensure. A Fully Integrated Medical Marijuana Treatment Center may also be referred to as a 'Medical Marijuana Treatment Center' or 'MTC.'

Drafter's Note: Ch. 65 § 51 removes vertical integration as a condition of licensure. Definition style mirrors 935 CMR 500.002 license type definitions.

Marijuana [AMENDED – Ch. 65 §§ 12, 43]

~~Marijuana (or Cannabis) means all parts of any plant of the genus Cannabis, whether growing or not; the seeds thereof; and resin extracted from any part 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.~~

Marijuana (or Cannabis) means all parts of any plant of the genus Cannabis, not excepted below and whether growing or not; and resin extracted from any part of the plant; and every compound, manufacture, salt, derivative, mixture or preparation of the plant or its resin including tetrahydrocannabinol as defined in section 1 of chapter 94C; provided, however, that marijuana shall not include: (i) 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; (ii) the seeds of the plant; (iii) hemp; or (iv) the weight of any other ingredient combined with marijuana to prepare topical or oral administrations, food, drink or other products.

Drafter's Note: Ch. 65 §§ 12 and 43 revise the Marijuana definition in M.G.L. c. 94G, § 1 and make M.G.L. c. 94I, § 1 cross-reference to it. The substantive change is the removal of seeds from the definition -- seeds of the plant are now expressly excluded. The prior regulatory definition included seeds. The revised statutory definition is adopted verbatim to ensure consistency with the governing statute and to avoid any divergence as the statute is amended over time.

Marijuana-infused Product (MIP) [DELETED]

~~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. [Full definition deleted.]~~

Drafter's Note: MIPs are already a subset of Marijuana Products. All MIP references replaced with 'Marijuana Products' as a global conforming amendment.

Medical Marijuana Dispensary (MMD) [NEW]

Medical Marijuana Dispensary (MMD) means an entity licensed under 935 CMR 501.000 to purchase or obtain Finished Marijuana Products and Medical-use Marijuana from licensed Medical Marijuana Establishments and Marijuana Establishments licensed under 935 CMR 500.000; to Repackage, store, sell, dispense, and administer Medical-use Marijuana and Finished Marijuana Products to Registered

Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions; and to deliver Medical-use Marijuana and Finished Marijuana Products to Registered Qualifying Patients, Personal Caregivers, and registered Caregiving Institutions. A Medical Marijuana Dispensary is not authorized to cultivate Marijuana or to Manufacture Marijuana Products.

Drafter's Note: The Medical Marijuana Dispensary is a Commission-created license type authorized by the Commission's rulemaking authority under M.G.L. c. 94I, § 7, as amended by Ch.65. Ch.65 creates the Fully Integrated MTC by statute and grants the Commission authority to license other types of medical marijuana-related businesses; the MMD is created pursuant to that authority. Definition style mirrors 935 CMR 500.002 license type definitions.

Medical Marijuana Establishment [AMENDED – Ch. 65 § 43]

~~Medical Marijuana Treatment Center (MTC), formerly known as a Registered Marijuana Dispensary (RMD), means [full prior definition deleted].~~

Medical Marijuana Establishment means a Fully Integrated Medical Marijuana Treatment Center or a Medical Marijuana Dispensary, or any other type of licensed medical use of marijuana-related business authorized by the Commission pursuant to M.G.L. c. 94I, § 7.

Drafter's Note: The umbrella term captures the FIMTC (created by Ch. 65 § 41), the MMD (created by Commission rulemaking under M.G.L. c. 94I, § 7), and any future license types the Commission may authorize. Applied throughout 935 CMR 501.000 wherever a provision applies equally to all MME license types.

Medical Marijuana Establishment Agent (MME Agent) [AMENDED -- replaces MTC Agent]

~~MTC Agent means any Owner, employee, Executive, or volunteer of an MTC, who shall be 21 years of age or older. [Full prior definition deleted.]~~

Medical Marijuana Establishment Agent (MME Agent) means any Owner, employee, Executive, or volunteer of a Medical Marijuana Establishment who shall be 21 years of age or older. Employee includes a consultant or contractor who provides on-site services to a Medical Marijuana Establishment related to the cultivation, harvesting, preparation, packaging, storage, testing, or dispensing of Marijuana or Marijuana Products for medical purposes.

Drafter's Note: Replaces 'MTC Agent' throughout 935 CMR 501.000. Umbrella term captures agents of any current or future MME license type.

Medical Marijuana Treatment Center (MTC) [AMENDED -- simplified]

~~Medical Marijuana Treatment Center (MTC) [full prior definition deleted]~~

Medical Marijuana Treatment Center (MTC) means a Fully Integrated Medical Marijuana Treatment Center as defined in 935 CMR 501.002.

Medical-use Marijuana [AMENDED -- consolidated definition]

~~Medical use Marijuana (or Medical use Cannabis) means Marijuana that is cultivated, Processed, Transferred, tested or sold in compliance with M.G.L. c. 94I, and 935 CMR 501.000.~~

~~Medical use Marijuana means Marijuana Products that are Manufactured, Transferred, tested or sold in compliance with M.G.L. c. 94I, and 935 CMR 501.000.~~

Medical-use Marijuana (or Medical-use Cannabis) means Marijuana or Marijuana Products that are cultivated, manufactured, processed, transferred, tested, sold, or dispensed in compliance with M.G.L. c.

94I and 935 CMR 501.000, including Marijuana or Marijuana Products possessed by a Registered Qualifying Patient under a Cultivation Registration.

Drafter's Note: Consolidates the prior two definitions -- 'Medical-use Marijuana' and 'Medical-use Marijuana or Marijuana Products' -- into one term. Ch. 65 § 43 defines Medical Use Marijuana in M.G.L. c. 94I, § 1 as 'marijuana or marijuana accessories sold by a medical marijuana establishment to a card holder for medical use, or marijuana or marijuana accessories possessed by a qualifying patient under a cultivation registration.' The regulatory definition elaborates on the statutory minimum to address operational matters the statute does not resolve: it is compliance-based rather than recipient-based, it incorporates Marijuana Products expressly, and it states the dosing limitation carve-out that governs the medical channel. The regulatory definition is consistent with and does not conflict with the statutory definition.

Qualifying Patient [AMENDED -- simplified]

~~Qualifying Patient means: (a) a Massachusetts Resident or a non-Massachusetts Resident receiving end-of-life or palliative care or cancer treatment in Massachusetts... [full prior definition deleted].~~

Qualifying Patient means a person who has been diagnosed by a Certifying Healthcare Provider as having a Debilitating Medical Condition.

Drafter's Note: The Massachusetts residency requirement was a Commission-imposed regulatory restriction, not a statutory requirement -- M.G.L. c. 94I has never required residency. The Commission is exercising its rulemaking authority under M.G.L. c. 94I, § 7 to remove the restriction. The prior end-of-life carve-out for non-residents is also struck -- it was a narrow exception to residency and is moot without the underlying restriction. Age-specific certification requirements remain in 935 CMR 501.010.

Registered Qualifying Patient [AMENDED -- simplified]

~~Registered Qualifying Patient or Patient means a Qualifying Patient who is currently and validly issued a temporary or an annual Registration Card by the Commission.~~

Registered Qualifying Patient or Patient means a Qualifying Patient who holds a current and valid Registration Card issued by the Commission pursuant to 935 CMR 501.015.

Registration Card [AMENDED]

Registration Card means a physical or electronic identification card, in a form determined by the Commission, currently and validly issued by the Commission to a Registered Qualifying Patient, Personal Caregiver, Institutional Caregiver, Medical Marijuana Establishment Agent, or Laboratory Agent. [Remainder of definition unchanged.]

Drafter's Note: Authorizes physical or electronic Registration Cards consistent with the Commission's modernization of patient-facing systems. 'MTC Agent' updated to 'MME Agent' as a global conforming amendment.

Seaworthy Vessel [NEW]

Seaworthy Vessel means a vessel that: (a) is fit in all aspects to complete the intended voyage; (b) is served by a properly trained crew with access to sufficient equipment and supplies; (c) is fit and safe for the reception, carriage, and preservation of Marijuana or Marijuana Products; (d) has passed Commission inspection as required under 935 CMR 501.200; and (e) is compliant with all applicable laws, regulations, and Commission orders.

State Territorial Waters [NEW]

State Territorial Waters means the navigable waters within the boundaries of the Commonwealth of Massachusetts as set forth in the Massachusetts Coastal Zone Map, published by the Massachusetts Office of Coastal Zone Management.

Temporary Registration [AMENDED – Ch. 65 § 45]

~~Temporary Registration means an interim registration document for patients and their personal caregivers, issued by the Commission pending issuance of a Registration Card.~~

Temporary Registration means an interim registration document for Registered Qualifying Patients and their Personal Caregivers generated automatically upon the Commission's receipt of a healthcare professional's electronic certification. The temporary registration document shall constitute a Registration Card for patients and their personal caregivers to access a Medical Marijuana Establishment. Temporary Registration shall expire 14 days after the Commission issues the Registration Card.

Social Equity Business [NEW – Ch. 65 § 61]

Social Equity Business means a Medical Marijuana Establishment with not less than 51 per cent majority ownership by individuals who are eligible for the Social Equity Program under M.G.L. c. 94G, § 22, or whose ownership qualifies it as an Economic Empowerment Priority Applicant as defined by the commission's regulations promulgated pursuant to M.G.L. c. 94G, § 4.

School Entrance [AMENDED]

~~School Entrance means the entrance(s) that provide ingress and egress to students of the pre-existing public or private school providing education in kindergarten or any grades 1 through 12 at the time of the newspaper publication of the proposed MTC's community outreach meeting under 935 CMR 501.101(1)(a)9.a.~~

School Entrance means the entrance(s) that provide ingress and egress to students of the pre-existing public or private school providing education in kindergarten or any grades 1 through 12 at the time of application submission under 935 CMR 501.100.

Drafter's Note: The prior definition anchored the School Entrance determination to the community outreach meeting publication date, which is struck by this redline. The time reference is updated to the date of application submission, which is the equivalent fixed point in the application process and is the moment at which the applicant commits to a proposed location and the Commission begins its review.

Global Conforming Amendments throughout 935 CMR 501.000

~~Marijuana infused Products (MIPs)~~ -> Marijuana Products

~~MTC Agent~~ -> Medical Marijuana Establishment Agent or MME Agent

~~medical marijuana treatment center (umbrella use)~~ -> Medical Marijuana Establishment

~~medical marijuana treatment center (vertically integrated entity)~~ -> Fully Integrated Medical Marijuana Treatment Center

~~license class / license classes~~ -> license type / license types

~~Fully Integrated MTCs and Medical Marijuana Dispensaries (where umbrella intent)~~ -> Medical Marijuana Establishments

~~M.G.L. c. 10, § 76~~ -> M.G.L. c. 6, § 223

Gendered pronouns (he or she, his or her) updated to gender-neutral language throughout all retained provisions.

935 CMR 501.160 (Testing) is retained without substantive change. All MTC and Medical Marijuana Treatment Center references are updated to Medical Marijuana Establishment by global conforming amendment. The testing protocol nomenclature reference in 501.160(1) shall be updated to reflect current Commission protocol naming upon promulgation. Testing obligations in 501.160 apply to all Medical Marijuana Establishments; ITL licensing and Laboratory Agent registration are governed by 935 CMR 500.000 consistent with 935 CMR 501.029.

501.003: Colocated Marijuana Operations (CMOs) [AMENDED]

~~Colocated Marijuana Operations (CMO) means an MTC operating under a License pursuant to 935 CMR 501.000 and a Marijuana Establishment operating under at least one License pursuant to 935 CMR 500.000 on the same Premises. [Remainder deleted.]~~

Colocated Marijuana Operations (CMO) means a Medical Marijuana Establishment operating under a license pursuant to 935 CMR 501.000 and a Marijuana Establishment operating under at least one license pursuant to 935 CMR 500.000, on the same Premises. A Medical Marijuana Establishment may hold adult-use Marijuana Establishment licenses under 935 CMR 500.000 consistent with applicable license caps. Nothing in this section limits the ability of a Medical Marijuana Establishment to elect which adult-use licensed activities it holds in conjunction with its medical use license.

501.005: Fees [AMENDED]

501.005(1): Fully Integrated Medical Marijuana Treatment Center -- Fees

[Existing MTC fee schedule retained without change.]

501.005(2): Medical Marijuana Dispensary -- License Fees [NEW]

(a) Application Fee: \$1,500 (non-refundable)

(b) Annual License Fee: \$10,000

(c) Change of Location Fee: \$5,000

(d) Change in Name Fee: \$1,000

(e) Change in Building Structure Fee: \$1,000

(f) Change in Ownership or Control Fee (entity): \$5,000 per entity, per license

(g) Change in Ownership or Control Fee (individual): \$500 per person

(h) Architectural Review Request Fee: \$1,500

(i) Packaging and Labeling Preapproval Application Fee: \$50 per product

501.005(3): Medical Marijuana Dispensary -- Equity Fee Waivers and Reductions [NEW]

(a) Application Fee Waivers. The \$1,500 application fee is waived for: (1) businesses controlled by and with majority ownership comprised of Social Equity Program Participants or Economic Empowerment Priority Applicants; (2) Massachusetts MBE, WBE, or VBE businesses with valid SDO certification that are also Small Businesses as defined by the Commission; or (3) any other diverse business enterprise with a valid certification from the Supplier Diversity Office. This waiver does not include background check costs.

(b) Annual License Fee Reduction. A 50% reduction in the annual license fee applies to: (1) Social Equity Program Participants or Economic Empowerment Priority Applicants; (2) qualifying MBE, WBE, or VBE businesses with valid SDO certification; or (3) any other diverse business enterprise with a valid certification from the Supplier Diversity Office.

501.005(4): Medical Marijuana Establishment Agent Registration Card -- Fees [AMENDED]

(a) An applicant for a Registration Card as a Medical Marijuana Establishment Agent or any other position designated as an agent by the Commission shall pay a nonrefundable application fee of \$115.

(b) An applicant for a renewal of a Registration Card shall pay a renewal fee of \$115.

Drafter's Note: Laboratory Agent reference removed. Laboratory Agents are registered under 935 CMR 500.000, not 935 CMR 501.000.

501.005(5): Caregiving Institution and Institutional Caregiver Registration Fees [NEW]

(a) Caregiving Institution Initial Registration Fee: \$500 (non-refundable)

(b) Caregiving Institution Three-Year Renewal Fee: \$300

(c) Institutional Caregiver Initial Registration Fee: \$50 per individual (non-refundable)

(d) Institutional Caregiver Three-Year Renewal Fee: \$35 per individual

(e) Change of Location Fee: \$100

501.005(6): Certifying Healthcare Provider Registration -- No Fee [NEW]

No registration fee shall be charged to Certifying Healthcare Providers for initial registration or three-year renewal under 935 CMR 501.009.

Drafter's Note: Registration and renewal are required to maintain an accurate statutory registry under M.G.L. c. 94I. The absence of a fee reflects the public health nature of provider registration and is intended to remove barriers to participation for certifying providers.

501.005(7): Physical Registration Card Fee [NEW]

(a) The Commission shall issue Registered Qualifying Patient and Personal Caregiver Registration Cards in electronic form by default at no additional charge.

(b) A Registered Qualifying Patient or Personal Caregiver who requests a physical Registration Card shall pay a fee of \$10 at the time of the request.

(c) The fee for replacement of any Registration Card, whether physical or electronic, is \$10.

Drafter's Note: The Commission has authority to determine the form and manner of Registration Cards under 935 CMR 501.002. M.G.L. c. 94I does not require the Commission to issue physical cards. Establishing electronic issuance as the default reduces both the cost of administering the registration program and the environmental impact of producing and distributing physical cards at scale.

501.009: Three-Year Renewal of Certifying Healthcare Provider Registration [NEW]

Drafter's Note: New section placed at 501.009 to keep registration-related provisions together. The three-year renewal cycle is the Commission's mechanism for fulfilling its statutory obligation under M.G.L. c. 94I to maintain an accurate registry of Certifying Healthcare Providers. The renewal requirement is an administrative registry maintenance process -- it verifies that registered providers continue to hold valid Massachusetts professional licenses -- and does not restrict who may certify or what conditions may be certified.

- (1) A Certifying Healthcare Provider registration is valid for three years from initial issuance or most recent renewal. A renewal application must be submitted not later than 90 days prior to expiration.
- (2) To renew, a Certifying Healthcare Provider shall: (a) submit a renewal application in a form and manner determined by the Commission; (b) attest that their Massachusetts professional license is current and in good standing; (c) attest continued practice consistent with the requirements of a Bona Fide Healthcare Provider-Patient Relationship; and (d) provide any updated contact or practice information required by the Commission.
- (3) A provider whose registration has lapsed may not issue Written Certifications until renewed or reinstated. A provider whose registration has lapsed for more than 12 months must apply as a new registrant.
- (4) The Commission may deny renewal if the provider: (a) no longer holds a valid Massachusetts professional license; (b) has been subject to a final disciplinary action related to inappropriate or fraudulent certification practices; or (c) has otherwise failed to comply with applicable registration requirements. A recommendation to deny shall be referred to the full Commission for action.
- (5) The Commission shall provide written notice of the renewal deadline not less than 120 days prior to expiration.

501.010: Written Certification [AMENDED at subsection (10)]

[Subsections (1) through (9) of 501.010 are retained without change.]

(10) A Written Certification for a Qualifying Patient younger than 18 years of age may be issued only if the Qualifying Patient has been diagnosed as having a Debilitating Medical Condition that is also a Life-limiting Illness and has been certified by ~~two Massachusetts licensed Certifying Physicians, at least one of whom is a board-certified pediatrician, pediatric subspecialist, oncologist, neurologist, or family physician;~~ two Certifying Healthcare Providers, at least one of whom shall be a board-certified pediatrician, pediatric subspecialist, oncologist, neurologist, or family physician, as having such a Debilitating Medical Condition.

Drafter's Note: 'Massachusetts licensed' removed -- redundant with the CHP definition which already requires Massachusetts licensure. 'Certifying Physicians' broadened to 'Certifying Healthcare Providers' to allow NPs and PAs to certify pediatric patients with Life-limiting Illnesses, consistent with the Commission's existing framework under which NPs and PAs are already authorized to certify adult patients. The extension to pediatric patients with the required specialty removes an inconsistency in the certifying provider framework. Specialty requirement retained.

501.015: Temporary and Annual Registration of Qualifying Patients [NOTE]

[Any provision within 501.015 that limits registration to Massachusetts residents, or that establishes a separate registration pathway for non-Massachusetts residents receiving end-of-life or palliative care or cancer treatment in Massachusetts, is struck. The open enrollment policy established by the amended Qualifying Patient definition governs eligibility for all persons.]

501.021: Registration of Caregiving Institutions [AMENDED]

[Existing 501.021 is retained with conforming amendments. All references to specific facility types within 501.021 are replaced with a cross-reference to the definition of Caregiving Institution at 935 CMR 501.002. The definition governs eligibility; repeating the enumeration in 501.021 is unnecessary and creates a risk of inconsistency if the definition is later amended. New subsections are numbered (7)

through (11) based on the existing subsection structure of 501.021. The following targeted amendments are also made:]

501.021(2) [AMENDED -- destruction obligation struck]

~~On the issuance of a new certificate, the holder of the certificate shall destroy any previously issued certificate in a responsible manner that would prevent it from being used as a certificate.~~

Drafter's Note: The destruction obligation is a physical-card-era requirement. The CI registration is database-driven; the Commission's confidential database is the authoritative record of registration status. Whether a physical certificate exists is immaterial to verification.

501.021(6) [AMENDED -- termination language]

~~(6) A Certificate of Registration for a Caregiving Institution will remain valid, unless and until the Caregiving Institution's current facility licensure or certification from the Commonwealth of Massachusetts is no longer active, or is suspended, revoked, or restricted.~~

(6) A Caregiving Institution registration terminates when the Caregiving Institution's current facility licensure or certification from the Commonwealth of Massachusetts is no longer active, or is suspended, revoked, or restricted.

Drafter's Note: Updated to use "terminates" consistent with the registration termination framework at 935 CMR 501.033. The triggering events are unchanged.

501.021(7): Ordering Authority [NEW]

(7) A registered Caregiving Institution, acting through a registered Institutional Caregiver, may place orders for Medical-use Marijuana with a licensed Medical Marijuana Establishment on behalf of its Registered Qualifying Patients. Each order shall identify the Registered Qualifying Patients for whom product is being ordered and the quantities attributable to each patient, consistent with applicable patient purchase limits.

Drafter's Note: Express ordering authority establishes the patient-level accounting required when a CI receives product for multiple patients simultaneously.

501.021(8): On-Site Consumption Authorization [NEW]

(8) A Caregiving Institution may permit Institutional Caregivers to administer Medical-use Marijuana to Registered Qualifying Patients on the premises of the Caregiving Institution, provided that: (a) administration is performed by a registered Institutional Caregiver; (b) the patient holds a current and valid Registration Card and a Written Certification; (c) administration is consistent with the patient's care plan and the Caregiving Institution's policies; (d) non-combustion, non-vaporizing forms of Medical-use Marijuana may be administered without additional Commission approval; and (e) smoking or vaporizing shall only be permitted where the Caregiving Institution has received prior Commission approval and has demonstrated air filtration and ventilation systems consistent with the standards applicable to Social Consumption Establishments under 935 CMR 500.141, employee safety practices consistent with those standards, and designation of specific areas separated from areas used by residents, patients, staff, or visitors who have not consented to exposure.

Drafter's Note: On-site consumption is a necessary predicate for residential facilities -- nursing homes, SNFs, hospice programs, LTC facilities -- where patients cannot take product home. Non-combustion is automatic; combustion requires prior Commission approval and social consumption ventilation standards under 935 CMR 500.141, balancing patient access against health and safety of other residents and staff.

501.021(9): Administration Records [NEW]

(9) The Institutional Caregiver administering Medical-use Marijuana shall log each administration in the patient's record maintained by the Caregiving Institution, including: the product administered; the quantity; the method of administration; the date and time; and the name and registration number of the administering Institutional Caregiver. Administration records shall be maintained as required by 935 CMR 501.000 and applicable state law.

501.021(10)-(11): Three-Year Renewal [NEW]

(10) A Caregiving Institution registration is valid for three years from initial issuance or most recent renewal. To renew, a Caregiving Institution shall: (a) submit a renewal application not later than 90 days prior to expiration; (b) attest continued eligibility and authorization; (c) provide an updated list of all currently registered Institutional Caregivers; (d) attest that all participating Institutional Caregivers hold current registrations; and (e) pay the applicable renewal fee under 935 CMR 501.005(5)(b).

(11) The Commission may deny renewal if the Caregiving Institution no longer meets eligibility requirements, has been subject to a final enforcement action materially affecting its ability to provide care, or has otherwise failed to comply with 935 CMR 501.000. A recommendation to deny shall be referred to the full Commission for action.

501.022: Registration of Institutional Caregivers [AMENDED -- new subsections added]

[Existing 501.022 retained with the following targeted amendments. New subsections are numbered (9) through (11) based on the existing subsection structure of 501.022.]

501.022(3) [AMENDED -- void replaced with terminates; promptly]

~~(3) A Caregiving Institution shall notify the Commission no more than one business day after an Institutional Caregiver ceases to be associated with the Caregiving Institution. The Institutional Caregiver's registration shall be immediately void when he or she is no longer associated with the Caregiving Institution.~~

(3) A Caregiving Institution shall promptly notify the Commission after an Institutional Caregiver ceases to be associated with the Caregiving Institution. The Institutional Caregiver's registration terminates when the Institutional Caregiver is no longer associated with the Caregiving Institution, consistent with 935 CMR 501.033(3).

Drafter's Note: "Immediately void" replaced with "terminates" consistent with 935 CMR 501.033(3). "No more than one business day" replaced with "promptly" consistent with the operational standard used throughout this redline.

501.022(4) [DELETED -- superseded by 501.022(10)]

~~[Existing 501.022(4) full text deleted.]~~

Drafter's Note: 501.022(4) is deleted. It governed the one-year validity period and annual renewal of IC Registration Cards, and required destruction of superseded cards. All three elements are superseded: renewal is now governed by the three-year renewal framework at 501.022(10); the destruction obligation is inconsistent with the digital registration environment; and the card-centric framing is replaced by the registration-centered framework at 935 CMR 501.033.

501.022(7) [AMENDED -- available for inspection]

~~(7) An Institutional Caregiver shall carry his or her Registration Card at all times while in possession of Marijuana.~~

(7) An Institutional Caregiver shall have their registration available for inspection at all times while in possession of Marijuana.

Drafter's Note: "Carry his or her Registration Card" replaced with "have their registration available for inspection" -- technology-neutral framing appropriate for a digital registration environment.

501.022(9): In-Person Purchasing Authority [NEW]

(9) A registered Institutional Caregiver may present at a licensed Medical Marijuana Establishment and purchase Medical-use Marijuana on behalf of identified Registered Qualifying Patients of their registered Caregiving Institution. The following verification requirements apply: (a) the Institutional Caregiver shall present their current and valid Institutional Caregiver Registration Card -- no government-issued photo identification is required; (b) the Medical Marijuana Establishment shall confirm through the Commission's confidential database that the Institutional Caregiver's registration and the Caregiving Institution's registration are both current and valid; (c) the Institutional Caregiver shall identify the Registered Qualifying Patients on whose behalf the purchase is being made; (d) the Medical Marijuana Establishment shall confirm each identified patient's registration is current and valid; (e) purchase quantities shall be attributed to each identified patient and shall not exceed applicable patient purchase limits; and (f) the Medical Marijuana Establishment shall record the transaction in the Commission's seed-to-sale tracking system, attributing product to each identified patient.

Drafter's Note: The IC Registration Card is Commission-issued and database-verifiable, serving the same identification function as the Registration Card plus government-issued photo ID combination required for Personal Caregivers. Requiring personal government-issued ID from healthcare professionals acting in their employment capacity creates an unnecessary privacy burden with no additional regulatory benefit. Intentional distinction.

501.022(10)-(11): Three-Year Renewal [NEW]

(10) An Institutional Caregiver registration is valid for three years from initial issuance or most recent renewal. To renew: (a) submit a renewal application not later than 90 days prior to expiration; (b) attest continued employment under a currently registered Caregiving Institution; (c) attest continued compliance with 935 CMR 501.022 and 501.025; and (d) pay the applicable renewal fee.

(11) An Institutional Caregiver whose registration has lapsed may not participate as an Institutional Caregiver in the medical use of marijuana program until renewed or reinstated.

501.025: Responsibilities of Caregivers [AMENDED -- Institutional Caregiver subsection]

[501.025(1) Personal Caregivers is retained without change. 501.025(2)(b) through (c) Institutional Caregiver prohibitions and notification requirements are retained without change. 501.025(2)(a) is amended as follows:]

~~(2)(a) An Institutional Caregiver may: 1. Receive Marijuana delivered to the Caregiving Institution for a Registered Qualifying Patient; 2. Prepare Marijuana for consumption by a Registered Qualifying Patient; and 3. Administer Marijuana to a Registered Qualifying Patient or facilitate consumption of Marijuana for medical use by the Qualifying Patient.~~

(2)(a) An Institutional Caregiver may: 1. Purchase Medical-use Marijuana in person at a licensed Medical Marijuana Establishment on behalf of identified Registered Qualifying Patients of their registered Caregiving Institution; 2. Place orders for Medical-use Marijuana with a licensed Medical Marijuana Establishment on behalf of Registered Qualifying Patients of their registered Caregiving Institution; 3. Receive Medical-use Marijuana delivered to the Caregiving Institution on behalf of Registered Qualifying Patients; 4. Prepare Medical-use Marijuana for consumption by a Registered Qualifying Patient; and 5. Administer Medical-use Marijuana to a Registered Qualifying Patient or facilitate consumption of Medical-use Marijuana by the Qualifying Patient.

Drafter's Note: 501.025(2)(a) is the affirmative authority provision for Institutional Caregivers. The prior text authorized only receiving delivery, preparing, and administering — it said nothing about in-person purchasing or ordering, which are established by the new frameworks at 501.022(9) and 501.021(7) respectively. Without a corresponding amendment here, those sections create procedural mechanics for activities not affirmatively authorized at the caregiver level. The revised subsection enumerates all five authorized IC activities. Prohibitions and notification requirements at 501.025(2)(b) and (c) are unchanged.

501.029: Independent Testing Laboratory Agents [AMENDED -- streamlined]

~~[Existing 501.029 full text deleted]~~

Independent Testing Laboratories and their agents that test Medical-use Marijuana under 935 CMR 501.000 shall be licensed and registered pursuant to 935 CMR 500.000. Nothing in 935 CMR 501.000 shall be construed to require separate licensure or registration of Independent Testing Laboratories or Laboratory Agents under this section.

Drafter's Note: ITLs have been licensed under 935 CMR 500 since the program transferred from DPH. A separate registration provision in 935 CMR 501 is redundant.

501.030: Registration of Medical Marijuana Establishment Agents [AMENDED]

~~Registration of Medical Marijuana Treatment Center Agents~~ -- section heading amended. All references to 'MTC Agent' amended to 'Medical Marijuana Establishment Agent' or 'MME Agent.' Existing requirements apply to all MME Agents of any Medical Marijuana Establishment.

(10) The issuance and renewal of Medical Marijuana Establishment Agent Registration Cards may be delegated to the Executive Director or their designee. The Executive Director or their designee shall issue or renew an MME Agent Registration Card where the applicant has submitted a complete application, satisfied all applicable suitability and background check requirements under 935 CMR 501.802, paid all applicable fees under 935 CMR 501.005(4), and is employed by or associated with a currently licensed Medical Marijuana Establishment. Medical Marijuana Establishment Agents shall remain suitable at all times in accordance with 935 CMR 501.802.

Drafter's Note: Agent registration is ministerial -- verification of background and eligibility. The carve-out for suitability concerns preserves Commission oversight where it is warranted.

501.040: Leadership Rating Program for Medical Marijuana Treatment Centers [DELETED]

~~[Existing 501.040 full text deleted.]~~

Drafter's Note: The Leadership Rating Program was never implemented. The new Medical Marijuana Establishment license structure — which separates the Fully Integrated MTC from the Medical Marijuana Dispensary — would require substantial rework to extend the program meaningfully across license types. Deletion removes a dormant provision and eliminates the enforcement hook at 501.040(3)(f), which authorized ratings to be considered in assessing fines and disciplinary action under a program that has not operated.

501.052: Independent Testing Laboratories [AMENDED -- streamlined]

~~[Existing 501.052 full text deleted.]~~

Independent Testing Laboratories that test Medical-use Marijuana under 935 CMR 501.000 shall be licensed pursuant to 935 CMR 500.000. Nothing in 935 CMR 501.000 shall be construed to require separate licensure of Independent Testing Laboratories under this section.

Drafter's Note: ITLs have been licensed exclusively under 935 CMR 500.000 since the program transferred from DPH. The existing 501.052 provisions governing ITL independence and conflict-of-interest requirements are subsumed by the 500.000 licensing framework. Parallel treatment with 935 CMR 501.029 (Laboratory Agents).

501.032: Revocation of Registration [AMENDED -- conforming]

[Existing 501.032 is retained without substantive change. All references to “Registration Card” are amended to read “registration” throughout, consistent with the registration-centered framework established at 935 CMR 501.033. Section heading updated accordingly. Note: the logical reading order of the registration adverse action framework is denial (501.031), termination (501.033), suspension (501.036), revocation (501.032); section numbering reflects historical sequence and does not alter the substantive framework.]

501.033: Termination of Registration [AMENDED]

~~[Existing 501.033 full text deleted.]~~

(1) A registration issued under 935 CMR 501.000 terminates automatically upon the occurrence of a terminating event set forth in 935 CMR 501.033(2) through (5). A terminated registration is inactive and invalid. The Commission shall promptly update the registration status in the confidential database following the terminating event.

(2) Medical Marijuana Establishment Agent Registrations. An MME Agent registration terminates when: (a) the agent has ceased to be associated with the Medical Marijuana Establishment under whose license the agent is registered.

(3) Institutional Caregiver Registrations. An Institutional Caregiver registration terminates when: (a) the Institutional Caregiver's employment at their registered Caregiving Institution ends.

(4) Qualifying Patient Registrations. A Qualifying Patient registration, including a Hardship Cultivation Registration, terminates when the Qualifying Patient is deceased.

(5) Personal Caregiver Registrations. A Personal Caregiver registration terminates when: (a) the Personal Caregiver has no remaining active patient designations. For the purposes of this subsection, a Personal Caregiver has no remaining active patient designations when all Registered Qualifying Patients for whom the Personal Caregiver is registered have died, are no longer registered with the Commission, or have each individually revoked the Personal Caregiver's designation.

(6) Pre-Program Transfer. A registration validly issued prior to the Program Transfer terminates upon issuance of a new registration under 935 CMR 501.000.

Drafter's Note: Section title and text updated throughout to speak to registrations rather than Registration Cards. The registration is the legal instrument; the Registration Card, whether physical or digital, is evidence of registration status. The Commission's confidential database is the authoritative record of registration status and the operative mechanism by which termination takes effect. New card supersession language is removed -- renewal of a registration is a continuation, not a terminating event. The prior “void” concept is replaced with “terminates” throughout; a terminated registration reflects one that was lawfully issued and has ended, not one that was invalid from inception. Subsection (5) corrects an inconsistency in the prior text under which termination could be triggered by a single patient's revocation of designation even where the caregiver continued to serve other patients; a Personal Caregiver registration terminates only when no active patient designations remain. The residency trigger previously applicable to patient registrations is struck as the residency requirement for Qualifying Patients has been eliminated by this redline.

501.036: Suspension of Registration [NEW]

(1) Authority. The Executive Director or their designee may suspend a registration issued under 935 CMR 501.000 pending investigation or Commission action where there is credible information supporting a reasonable belief that the registrant has engaged in conduct that would constitute grounds for revocation under 935 CMR 501.032 or that otherwise poses a risk to public health, safety, or welfare. The Commission shall promptly update the registration status in the confidential database following the suspension.

(2) Triggering Circumstances. Suspension may be appropriate where there is credible information of: (a) diversion of Medical-use Marijuana to unauthorized persons; (b) fraudulent use or misrepresentation in connection with a registration; (c) an active criminal investigation involving the registrant that relates to conduct governed by 935 CMR 501.000; (d) for MME Agent and Institutional Caregiver registrations: summary suspension of the associated MME license or Caregiving Institution registration, unless otherwise authorized by the Commission; or (e) any other circumstance the Executive Director determines poses a credible and immediate risk to public health, safety, or welfare.

(3) Procedure. (a) Suspension shall be effective upon written notice to the registrant at their address of record or electronic mail address of record, whichever the Commission determines is most likely to provide prompt notice. (b) Written notice shall state the basis for suspension and inform the registrant of the right to promptly request a hearing before a hearing officer pursuant to 935 CMR 501.500. (c) Suspension does not constitute a final determination of the underlying allegations and does not preclude revocation proceedings under 935 CMR 501.032.

(4) Duration and Reinstatement. (a) A suspension shall remain in effect pending Commission action or resolution of the underlying circumstances. (b) The Executive Director shall reinstate a suspended registration upon a determination that the basis for suspension no longer exists or that the underlying investigation has been resolved without a finding of misconduct. The Commission shall promptly update the registration status in the confidential database upon reinstatement. (c) If the Commission does not initiate revocation proceedings within 90 days of suspension, the Executive Director shall review the basis for continued suspension and shall either reinstate the registration or refer the matter to the Commission for action.

(5) Qualifying Patient Registrations. Suspension of a Qualifying Patient registration shall be used only where there is credible evidence of diversion of Medical-use Marijuana to third parties or fraud in the application. The Executive Director shall consider whether less restrictive means, including purchase limit reductions or enhanced monitoring, are adequate to address the identified risk before suspending a Qualifying Patient registration.

Drafter's Note: The existing framework provides no intermediate tool between denial and revocation for registrations. Suspension fills that gap, particularly for diversion allegations where action is needed quickly but a full revocation proceeding is premature. Suspension operates through the confidential database -- updating registration status to inactive is the operative mechanism by which access is restricted, consistent with the verification framework throughout 935 CMR 501.000. The framework mirrors the summary suspension authority at 935 CMR 501.350 for licenses, adapted for registrations. Qualifying Patient registrations receive heightened procedural protection given the medical access implications. The 90-day review requirement prevents indefinite suspension without Commission action. Note: the order of the registration adverse action framework is denial (501.031), termination (501.033), suspension (501.036), revocation (501.032); section numbering reflects historical sequence and does not alter the substantive framework.

501.034: Revocation and Voluntary Surrender of Certifying Healthcare Provider Registration [AMENDED]

[Existing 501.034(1) revocation grounds retained without change. The following subsection is added:]

(2) Voluntary Surrender. A Certifying Healthcare Provider may voluntarily surrender their registration by submitting written notice to the Commission. The Commission shall confirm receipt and the registration

shall terminate on the date specified in the notice, or, if no date is specified, upon the Commission's confirmation of receipt. A provider who surrenders a registration while under investigation or subject to pending disciplinary proceedings shall be noted as such in the Commission's records. Surrender does not preclude the Commission from completing any pending investigation or proceeding.

Drafter's Note: Section heading updated to reflect both revocation and the new voluntary surrender subsection. Revocation grounds at 501.034(1) are retained without change — these are conduct-based, discretionary, and require Commission action. Voluntary surrender is a distinct pathway for providers who choose to exit the program; it is not a disciplinary action and does not carry the same regulatory consequences as revocation. The note regarding pending investigations ensures that surrender cannot be used to extinguish a disciplinary proceeding.

501.035: Void Certifying Physician Registration [DELETED]

~~[Existing 501.035 full text deleted.]~~

Drafter's Note: 501.035 is deleted. The section heading was a misnomer — it referred to “Certifying Physician Registration” but the body already applied to all Certifying Healthcare Providers. More fundamentally, “void” is not a defined term and carries the implication that the authority never existed, which is legally inaccurate for a validly issued registration. The triggering events in 501.035 — professional license lapse, prescribing restriction, controlled substances registration suspended or revoked — are objective and verifiable and are properly addressed through automatic suspension under 935 CMR 501.037, which provides a clear regulatory status, preserves existing patient certifications for their duration, and creates a reinstatement pathway when the triggering condition resolves. Voluntary surrender is addressed at 935 CMR 501.034(2).

501.037: Suspension of Certifying Healthcare Provider Registration [NEW]

(1) The registration of a Certifying Healthcare Provider shall be automatically suspended, without prior notice or hearing, upon: (a) the lapse, expiration without renewal, suspension, or revocation of the provider's Massachusetts professional license; (b) the complete loss of the provider's authority to prescribe under their Massachusetts professional license; or (c) the suspension or revocation of the provider's Massachusetts controlled substances registration.

(2) During suspension: (a) the provider may not issue Written or Electronic Certifications; (b) previously issued valid certifications remain in effect for their duration. A patient whose current registration remains valid does not need a new certification until renewal; and (c) the Commission shall remove the provider from the publicly accessible opt-in provider list maintained pursuant to 935 CMR 501.820.

(3) Not later than five business days after receiving notice of suspension from the Commission, the Certifying Healthcare Provider shall notify all current patients: (a) that the provider is currently unable to issue Written Certifications; and (b) that patients should contact another registered Certifying Healthcare Provider to obtain a new certification when their current registration is due for renewal.

(4) If the Certifying Healthcare Provider fails to notify current patients within the five-business-day period required by subsection (3), the Commission may notify affected patients using information in the Commission's confidential database.

(5) The Commission shall notify the provider of the automatic suspension by written notice to the provider's physical address of record or via electronic mail to the address or addresses on file with the Commission, whichever the Commission determines is most likely to provide prompt notice. Suspension takes effect upon the triggering event, not upon receipt of notice.

(6) A provider may apply for reinstatement upon providing documentation satisfactory to the Executive Director or their designee that their professional license has been reinstated or that the complete loss of prescribing authority has been lifted. The Executive Director or their designee shall reinstate the registration upon a finding that the basis for automatic suspension no longer exists.

(7) Automatic suspension does not preclude the Commission from initiating revocation proceedings under 935 CMR 501.034 where the circumstances also constitute grounds for revocation.

(8) The Commission may periodically cross-reference its registry of Certifying Healthcare Providers against professional licensing board records to identify providers whose licenses have lapsed or been restricted.

Drafter's Note: Section renamed from "Automatic Suspension" to "Suspension" to reflect that this section governs all suspension of CHP registrations, not only automatic triggers. Triggering events expanded to expressly include suspension or revocation of the provider's Massachusetts controlled substances registration, which was the basis for one of the void triggers in the deleted 501.035 and belongs here. Objective triggering events require no discretionary analysis; partial restrictions or consent agreements with conditions are addressed through revocation under 935 CMR 501.034(1). The five-business-day patient notification window places primary obligation on the provider; the Commission backstop protects patients if the provider fails to act.

501.038: Issuance and Renewal of Registrations by Executive Director or Designee [NEW]

(1) The Executive Director or their designee may issue and renew the registrations set forth in subsection

(2). A registrant that submits a complete application in compliance with all applicable requirements of 935 CMR 501.000 and pays all applicable fees shall be issued a registration or renewal. Medical Marijuana Establishment Agent registrations are governed by 935 CMR 501.030.

Drafter's Note: Registrations differ from licenses -- a qualifying patient, caregiver, or provider who meets eligibility requirements has a right to register. Issuance is ministerial. MME Agent registration involves background and suitability checks and is separately addressed at 935 CMR 501.030(10).

(2) Registrations issued and renewed under this section: (a) Qualifying Patients -- 935 CMR 501.015; (b) Personal Caregivers -- 935 CMR 501.020; (c) Certifying Healthcare Providers -- 935 CMR 501.006, 501.007, 501.008, and 501.009; (d) Institutional Caregivers -- 935 CMR 501.022; and (e) Caregiving Institutions that are hospice programs, long-term care facilities, skilled nursing facilities, hospitals, licensed ambulatory care facilities, or home health agencies -- 935 CMR 501.021.

(3) The initial registration of a Caregiving Institution that does not fall within an enumerated category in subsection (2)(e) shall require approval by a vote of the Commission. Such an entity is an 'other entity providing care as authorized by the Commission' as defined in 935 CMR 501.002. Consistent with M.G.L. c. 6, § 223(e), two votes of the commissioners shall be required. A denial shall be issued in writing with grounds stated and shall inform the applicant of the right to seek judicial review under M.G.L. c. 30A. Upon initial approval by the Commission, subsequent renewals are ministerial under subsection (1).

Drafter's Note: Only the 'other entity' catch-all requires a Commission vote -- that is a genuine discretionary determination. All enumerated healthcare entities are already licensed by the Commonwealth.

(4) A registration or renewal shall be issued under this section only where the application is complete, all requirements are satisfied on the face of the application, and all applicable fees have been paid. A non-compliant application shall be handled under 935 CMR 501.031.

(5) The Executive Director may designate one or more Commission staff members to perform the functions described in this section. Such designation shall be made in writing.

(6) Summary data on registration activity shall be provided to the full Commission at regular intervals as determined by the Commission.

501.050: Medical Marijuana Establishments -- License Types, Caps, and Equity [AMENDED]

501.050(1): License Types

The Commission shall license the following types of Medical Marijuana Establishments pursuant to M.G.L. c. 94I, § 7 and 935 CMR 501.000:

(a) Fully Integrated Medical Marijuana Treatment Center (FIMTC): An entity licensed under 935 CMR 501.000 to elect and perform any combination of cultivating Marijuana, manufacturing and processing Marijuana Products, and dispensing and delivering Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions. A FIMTC is not required to simultaneously perform all licensed activities as a condition of licensure.

(b) Medical Marijuana Dispensary (MMD): An entity licensed under 935 CMR 501.000 to purchase, obtain, store, dispense, and deliver Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions. An MMD is not authorized to cultivate Marijuana or to Manufacture Marijuana Products. Authorized sources of supply are set forth in 935 CMR 501.106(2)(a).

501.050(2): License Caps – Ch. 65 § 36

(a) No licensee shall hold more than 3 FIMTC licenses.

(b) No licensee holding 3 FIMTC licenses shall hold any additional Medical Marijuana Establishment licenses.

(c) No licensee shall hold more than 6 MMD licenses; provided that for the first 12 months after the Commission begins accepting MMD applications, a licensee that is not a Social Equity Business shall not be granted more than 5 MMD licenses.

(d) A person functioning solely as an ESOP trustee during or after the sale of a Medical Marijuana Establishment to a licensee's employees as defined in 29 U.S.C. 1107(d)(6) is not subject to the limitations of this subsection.

(e) A person or entity holding less than 20% equity in a license and lacking direct or indirect control over operations is not subject to the limitations of this subsection.

501.050(3): Social Equity Exclusivity Period -- H.5350 § 61

(a) Medical Marijuana Dispensary licenses shall be limited on an exclusive basis to Social Equity Businesses for 24 months from the date the first MMD license receives a notice to commence operations; provided that the Commission may vote to extend the exclusivity period upon an evidence-based determination that equity goals have not been met.

(b) If data demonstrates progress toward equity goals but demand may exceed Social Equity Business supply during the exclusivity period, the Commission may vote to allow the following additional entities to apply for and hold Medical Marijuana Dispensary licenses: (i) Craft Marijuana Cooperatives as defined in 935 CMR 500.002; (ii) Massachusetts Minority Business Enterprises; (iii) Women Business Enterprises; (iv) Veteran Business Enterprises with valid SDO certification under M.G.L. c. 7, § 61; or (v) any other diverse business enterprise with a valid certification from the Supplier Diversity Office.

501.050(4): Marijuana Retailer Colocation Pathway to Medical Marijuana Dispensary License.

(1) A Marijuana Retailer currently and validly licensed under 935 CMR 500.000 that has received a notice to commence operations may apply for a Medical Marijuana Dispensary license to operate on a

colocated basis at the same licensed premises. A Licensee may hold one Medical Marijuana Dispensary license under this subsection for each Marijuana Retailer license held. A Medical Marijuana Dispensary license issued under this subsection is not subject to the exclusivity period under 935 CMR 501.050(3).

(2) An applicant shall submit to the Commission:

- (a) A completed application in a form and manner determined by the Commission;
- (b) Documentation that the applicant holds a currently valid Marijuana Retailer license and has received a notice to commence operations;
- (c) The applicable Medical Marijuana Dispensary application fee under 935 CMR 501.005(2); and
- (d) Any other information required by the Commission.

(3) No new suitability determination, background check, or fingerprinting is required. The applicant's existing suitability finding under 935 CMR 500.000 governs. A material change in suitability shall be handled consistent with 935 CMR 501.800 and 501.801.

(4) The Commission shall act on a complete application and shall approve an applicant in good standing.

(5) A Medical Marijuana Dispensary license holder shall pay the applicable annual license fee under 935 CMR 501.005(2) and shall comply with all applicable requirements of 935 CMR 501.000.

Drafter's Note: This subsection creates an ongoing colocation pathway for existing Marijuana Retailers to hold a Medical Marijuana Dispensary license at the same licensed premises, advancing patient access through existing retail infrastructure without a duplicative licensing process. A colocated MMD issued under this subsection is an extension of an existing licensed operation, not a new market entrant, and is may be outside the Social Equity exclusivity period under 935 CMR 501.050(3) and Ch. 65 § 61. Federal rescheduling of marijuana as a Schedule III controlled substance creates new incentives for adult-use operators to participate in the medical program; this pathway ensures the Commonwealth's existing retail network can expand patient access.

501.101: Application Requirements [AMENDED -- partial]

[935 CMR 501.101(1)(a)9.a is amended to strike the requirement that an applicant for a Medical Marijuana Establishment license hold a community outreach meeting prior to licensure. All other provisions of 935 CMR 501.101 are retained without change, subject to global conforming amendments substituting 'Medical Marijuana Establishment' for 'Medical Marijuana Treatment Center' and 'license type' for 'license class' throughout.]

~~501.101(1)(a)9.a. [Community outreach meeting requirement—full text of provision deleted.]~~

Drafter's Note: The community outreach meeting requirement was established in the early years of the medical marijuana program to provide communities an opportunity to engage with applicants before local permitting decisions were made. After more than a decade of program operation and the parallel maturation of the adult-use market, the requirement adds process without a corresponding regulatory benefit. Communities have extensive experience with cannabis licensees. The local permitting and zoning process, the Host Community Agreement requirement, and the Commission's licensing review already provide multiple meaningful opportunities for community input. Striking the requirement for Medical Marijuana Establishments is consistent with Ch. 65's goal of expanding and simplifying the medical program. A parallel amendment to 935 CMR 500.000 to strike the community outreach meeting requirement for adult-use Marijuana Establishments is recommended in the next available rulemaking cycle.

501.102: Action on Applications [AMENDED]

[Existing 501.102 is retained. Subsections (a) through (e) exist in the current regulation. The following subsection is added:]

(f) Priority Review for Medical Marijuana Dispensary Applications. In reviewing MMD applications, the Commission shall prioritize: (1) Social Equity Businesses; (2) Economic Empowerment Priority Applicants; (3) Expedited Applicants including qualifying MBE, WBE, and VBE businesses and any other diverse business enterprise with a valid certification from the Supplier Diversity Office; (4) General Applicants. Priority review shall be consistent with M.G.L. c. 94G, § 16 & 22 and the exclusivity provisions of 935 CMR 501.050(3).

501.103: Licensure and Renewal [AMENDED -- new subsection added]

[Existing 501.103 retained without change. The following subsection is added:]

(5) The Commission may delegate to the Executive Director or their designee the authority to approve the renewal of licenses issued under 935 CMR 501.000. Any such delegation shall be made by a vote of the Commission and shall specify the scope and conditions of the delegated authority. A recommendation by the Executive Director or their designee to deny a renewal application shall be referred to the full Commission for action. Consistent with M.G.L. c. 6, § 223(e), two votes of the commissioners shall be required for any Commission action on a referred renewal.

Drafter's Note: Permissive delegation -- Commission may delegate by vote but is not required to. Two-vote requirement for referred denials is restated per M.G.L. c. 6, § 223(e) to confirm full Commission action is required.

(6) Conversion of Fully Integrated Medical Marijuana Treatment Center License to Medical Marijuana Dispensary License.

(1) A Fully Integrated Medical Marijuana Treatment Center currently and validly licensed under 935 CMR 501.000 may apply to convert its license to a Medical Marijuana Dispensary license.

(2) A conversion under this subsection is a modification of an existing license, not the issuance of a new license. A converted MMD license retains the same license number, license term, and host community agreement as the converting FIMTC license. The Social Equity exclusivity period applicable to new Medical Marijuana Dispensary applications under 935 CMR 501.050(3) does not apply to conversions under this subsection.

(3) An applicant for conversion shall submit to the Executive Director or their designee: (a) a written request for conversion identifying the FIMTC license to be converted; (b) where the applicant is actively conducting cultivation or manufacturing operations under its FIMTC license at the time of application, either: 1. documentation that the applicant holds currently valid 935 CMR 500.000 licenses authorizing those operations, which shall continue under those licenses following conversion; or 2. a transition plan for the wind-down or transfer of those operations prior to the effective date of conversion; (c) documentation of any 935 CMR 500.000 licenses held by the applicant or any affiliated entity that will serve as the source of supply for the converted MMD; and (d) any other information required by the Commission.

(4) A conversion does not require a new suitability determination. The applicant's existing suitability finding under 935 CMR 501.800 and 501.801 remains in effect. If the conversion application reveals a material change in suitability since the original finding, the matter shall be handled consistent with 935 CMR 501.800 and 501.801.

(5) The Executive Director or their designee shall approve a conversion where the application is complete and the applicant holds a currently valid FIMTC license in good standing. Approval shall be issued in

writing, shall constitute an amendment to the existing license, and shall specify the effective date of conversion.

(6) Upon the effective date of conversion: (a) the converted license is a Medical Marijuana Dispensary license subject to 935 CMR 501.106 and all applicable MMD operational requirements; (b) the licensee's authority to cultivate Marijuana and manufacture Marijuana Products under its FIMTC license is terminated; and (c) the licensee's existing 935 CMR 500.000 licenses are unaffected and shall serve as the authorized vehicle for any continuing cultivation and manufacturing operations.

(7) A conversion does not affect: (a) the licensee's vested rights under its existing host community agreement; (b) any renewal or other application pending at the time of conversion; or (c) any existing investigation or enforcement proceeding.

(8) The Commission shall accept conversion applications for a period of 36 months following the date on which the Commission first begins accepting new Medical Marijuana Dispensary applications. The Commission may by vote extend this period.

Drafter's Note: The conversion pathway allows existing FIMTCs to consolidate their licensed activities by converting their medical license to an MMD and authorizing cultivation and manufacturing under their existing 935 CMR 500.000 licenses. This reflects the post-Ch. 65 policy goal of a unified cannabis supply chain serving both the medical and adult-use markets, with the license type determining the end recipient rather than the underlying operations. Conversion is a license modification, not a new license, and is not subject to the Social Equity exclusivity period applicable to new MMD applications under 935 CMR 501.050(3).

501.105: General Operational Requirements for Medical Marijuana Treatment Centers [AMENDED]

~~(1)(a) An MTC shall cultivate, process, and dispense medical use marijuana at its licensed premises. An MTC may not purchase or receive marijuana from another entity unless authorized pursuant to 935 CMR 501.120.~~

(1)(a) A Fully Integrated Medical Marijuana Treatment Center is not required to simultaneously cultivate, process, and dispense medical use marijuana as a condition of licensure. A Fully Integrated Medical Marijuana Treatment Center shall perform only those licensed activities elected in its application pursuant to 935 CMR 501.100(1) and may purchase or obtain Finished Marijuana Products and Medical-use Marijuana from other licensed Medical Marijuana Establishments and from Marijuana Establishments licensed under 935 CMR 500.000 as permitted by the Commission.

(1)(b) A Fully Integrated Medical Marijuana Treatment Center that has elected dispensing as a licensed activity pursuant to 935 CMR 501.100(1) is authorized to dispense and deliver Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions, consistent with 935 CMR 501.140 and 935 CMR 501.145.

(1)(c) Adult-use per-serving and per-package dosing limitations under 935 CMR 500.000 do not apply to a Fully Integrated Medical Marijuana Treatment Center. A Fully Integrated Medical Marijuana Treatment Center may receive Marijuana Products from a Marijuana Product Manufacturer licensed under 935 CMR 500.000 that exceed adult-use dosing limitations, consistent with 935 CMR 500.130.

Drafter's Note: Adult-use dosing caps have never applied to MTCs. Subsection (1)(c) codifies the existing regulatory position and confirms FIMTCs may receive above-cap products from 500-licensed MPMs per 935 CMR 500.130.

~~(j) An MTC may acquire Marijuana and Marijuana Product from or distribute Marijuana or Marijuana Product to another MTC or Marijuana Establishment in accordance with 935 CMR 501.140(8) and subject to the following: 1. The distribution and acquisition of Marijuana and Marijuana Product, including MIPs, to and from all other MTCs does not exceed, cumulatively, 45% of the MTC's total annual inventory... [full prior subsection deleted].~~

Drafter's Note: Struck. The 45% acquisition cap was a product of the vertically integrated model. With vertical integration no longer required, a FIMTC electing cultivation-only or manufacturing-only exists precisely to supply other MMEs. The cap is directly contrary to the post-Ch. 65 program structure.

[All other subsections of 501.105 retained without change, subject to global conforming amendments: 'MTC Agent' becomes 'Medical Marijuana Establishment Agent' and 'MIPs' becomes 'Marijuana Products' throughout.]

501.106: General Operational Requirements for Medical Marijuana Dispensaries [NEW]

501.106(1): General

A Medical Marijuana Dispensary shall comply with the same dispensing and delivery operational requirements applicable to a Fully Integrated Medical Marijuana Treatment Center under 935 CMR 501.105, as applied to dispensing operations, together with the additions and modifications specific to the MMD license type set forth in this section.

Drafter's Note: Cross-references FIMTC dispensing framework to keep all MME dispensing standards within 935 CMR 501 rather than importing adult-use retail requirements from 935 CMR 500.

501.106(2): Authorized Operations

An MMD is authorized to:

- (a) Purchase or obtain Finished Marijuana and Marijuana Products and Medical-use Marijuana from: (1) a Fully Integrated Medical Marijuana Treatment Center licensed under 935 CMR 501.000; (2) a Medical Marijuana Dispensary licensed under 935 CMR 501.000; (3) a Marijuana Cultivator licensed under 935 CMR 500.000; (4) a Marijuana Product Manufacturer licensed under 935 CMR 500.000; or (5) a Marijuana Retailer licensed under 935 CMR 500.000;
- (b) Repackage, label, store, and dispense Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions;
- (c) Deliver Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, Institutional Caregivers acting on behalf of registered Caregiving Institutions, and registered Caregiving Institutions, directly or through contracted delivery arrangements consistent with 935 CMR 501.145; and
- (d) Transport Medical-use Marijuana between its own licensed locations.

Drafter's Note: Medical channel sources first (FIMTC, MMD), 500-licensed sources second (Cultivator, MPM, Retailer). Transfer authorization enabling 500-licensed entities to supply MMEs is in 935 CMR 500.000.

501.106(3): Dosing Limitations

Adult-use per-serving and per-package dosing limitations under 935 CMR 500.000 do not apply to a Medical Marijuana Dispensary. An MMD may receive and dispense Marijuana Products from a Marijuana Product Manufacturer licensed under 935 CMR 500.000 that exceed adult-use dosing limitations, provided that such products are dispensed exclusively to Registered Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions, and are not transferred or sold to any adult-use Marijuana Establishment or Consumer.

501.106(4): Patient and Institutional Verification and Dispensing

An MMD may dispense Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, and Institutional Caregivers acting on behalf of registered Caregiving Institutions. Verification

requirements, purchase limits, and record-keeping obligations applicable to all Medical Marijuana Establishments are governed by 935 CMR 501.140.

501.106(5): Security Requirements

An MMD shall comply with security requirements applicable to MTCs under 935 CMR 501.110.

501.106(6): Delivery Authorization

(a) Delivery of Medical-use Marijuana to Registered Qualifying Patients, Personal Caregivers, Institutional Caregivers acting on behalf of registered Caregiving Institutions, and registered Caregiving Institutions is an authorized activity within the Medical Marijuana Dispensary license. Delivery is permitted but not mandatory. No separate Delivery Endorsement is required.

(b) An applicant intending to deliver shall include a delivery plan in its application as required by 935 CMR 501.100(2)(c).

(c) An MMD seeking to commence delivery after licensure shall submit to the Executive Director or their designee: (1) a written request describing proposed delivery operations; (2) delivery Standard Operating Procedures addressing patient, caregiver, and institutional verification, chain-of-custody documentation, manifest procedures, failed delivery procedures, and vehicle security; and (3) any other information required by the Commission.

(d) The Executive Director or their designee shall issue a written decision within 30 days of a complete submission. The Executive Director shall either approve the request or refer it to the full Commission with a written recommendation. If referring, the Executive Director shall: (i) issue written notice to the MMD with specific grounds for the recommendation; and (ii) afford the MMD 21 days to respond before the matter is placed on the Commission agenda.

(e) The matter shall be referred to the full Commission for action. Consistent with M.G.L. c. 6, § 223(e), two votes of the commissioners shall be required for any Commission action. A denial shall be issued in writing and shall inform the MMD of the right to seek judicial review under M.G.L. c. 30A.

(f) Material changes to delivery operations are subject to notification under 935 CMR 501.104.

501.120: Additional Operational Requirements for Cultivation, Acquisition, and Distribution [AMENDED]

[Existing 501.120 is retained for Fully Integrated MTCs with global conforming amendments. Subsections (a) through (f) exist in the current regulation. The following subsection is added:]

(g) Medical Marijuana Dispensary Acquisition. A Medical Marijuana Dispensary may acquire Medical-use Marijuana and Finished Marijuana Products from: (1) a Fully Integrated Medical Marijuana Treatment Center licensed under 935 CMR 501.000; (2) a Medical Marijuana Dispensary licensed under 935 CMR 501.000; (3) a Marijuana Cultivator licensed under 935 CMR 500.000; (4) a Marijuana Product Manufacturer licensed under 935 CMR 500.000; or (5) a Marijuana Retailer licensed under 935 CMR 500.000. All acquisitions shall be documented in the Commission's seed-to-sale tracking system and accompanied by required manifests and testing documentation.

Drafter's Note: Medical sources first (FIMTC, MMD), 500-licensed sources second (Cultivator, MPM, Retailer) -- consistent with 935 CMR 501.106(2)(a).

501.140: Patient Sales [AMENDED]

[Existing 501.140 is retained and amended as follows:]

501.140(2)(a): Verification of Patient and Caregiver Certification [AMENDED]

[935 CMR 501.140(2)(a) and the enumerated sub-items at 501.140(2)(a)(1)(a)-(d) are amended as shown. The unified standard applies to both in-store dispensing and delivery. The enumerated list of acceptable government-issued identification types is struck.]

~~Upon entry into an MTC by a Registered Qualifying Patient or Personal Caregiver, or arrival at a residence for delivery to a Registered Qualifying Patient or Personal Caregiver, an MTC or Marijuana Courier Agent shall immediately inspect the Patient's or caregiver's temporary or annual Registration Card and proof of government-issued identification.~~

~~The government-issued identification card shall contain a name, photograph, and date of birth, and shall be limited to one of the following: (a) a driver's license; (b) a government issued identification card; (c) a military identification card; or (d) a passport.~~

A Medical Marijuana Establishment shall verify the identity and registration status of a Registered Qualifying Patient or Personal Caregiver prior to dispensing, whether in-store or at point of delivery, by: (1) confirming that the individual presents either: (a) a valid Registration Card; or (b) a valid government-issued photo identification; and (2) confirming through the Commission's Confidential Database that the individual's registration is current and valid.

Drafter's Note: Unified verification standard for in-store and delivery dispensing. Either credential -- the Commission-issued Registration Card or a valid government-issued photo identification -- is sufficient, provided the Commission's Confidential Database confirms current and valid registration in both cases. The enumerated list of specific ID types is struck; 'valid government-issued photo identification' is the operative standard and is broad enough to include the Massachusetts Commission for the Blind identification card as required by M.G.L. c. 6, § 135 and any other government-issued photo credential. The Registration Card definition at 935 CMR 501.002 already provides that Registration Cards may be physical or electronic.

(15) A Medical Marijuana Establishment may dispense Medical-use Marijuana to: (a) Registered Qualifying Patients; (b) Personal Caregivers; and (c) Institutional Caregivers acting on behalf of Registered Qualifying Patients of their registered Caregiving Institution.

(16) A registered Caregiving Institution may obtain Medical-use Marijuana for its Registered Qualifying Patients through any of the following pathways: (a) by placing an order with a licensed Medical Marijuana Establishment through a registered Institutional Caregiver pursuant to 935 CMR 501.021(7); (b) by an Institutional Caregiver purchasing in person at a licensed Medical Marijuana Establishment pursuant to 935 CMR 501.022(9); or (c) by receiving delivery of Medical-use Marijuana at the Caregiving Institution premises pursuant to 935 CMR 501.145(3).

Drafter's Note: Single authoritative statement of authorized dispensing recipients for all MMEs. Subsection (16) consolidates the three pathways through which a registered Caregiving Institution may access Medical-use Marijuana, with cross-references to the mechanics governing each.

501.145: Patient Delivery -- Statewide Authorization, Verification, and Delivery Arrangements [AMENDED]

501.145(1): Statewide Delivery Authorization

A Medical Marijuana Establishment authorized by the Commission to deliver Medical-use Marijuana may deliver to Registered Qualifying Patients, Personal Caregivers, Institutional Caregivers acting on behalf of registered Caregiving Institutions, and registered Caregiving Institutions in all municipalities in

the Commonwealth. A municipality may not prohibit the delivery of Medical-use Marijuana within its borders by a licensed Medical Marijuana Establishment.

Drafter's Note: H.5350 § 25 establishes a municipal opt-out for adult-use delivery under M.G.L. c. 94G. That mechanism does not apply to medical delivery under M.G.L. c. 94I.

501.145(2): Point-of-Delivery Verification -- Individual Recipients

~~Pre-verification. Prior to delivering Medical-use Marijuana to a Registered Qualifying Patient or Personal Caregiver, a Medical Marijuana Establishment shall conduct a pre-verification of the patient's or caregiver's identity and registration status, which shall include an in-person examination of the patient's or caregiver's identification prior to the first delivery.~~

Drafter's Note: Prior in-person pre-verification requirement eliminated. Patient and caregiver registration is verifiable in real time through the Commission's confidential database.

(a) A Medical Marijuana Establishment delivering Medical-use Marijuana to a Registered Qualifying Patient or Personal Caregiver shall verify the identity and registration status of the recipient at the point of delivery consistent with the verification standard at 935 CMR 501.140(2)(a).

Drafter's Note: Cross-references the unified verification standard at 501.140(2)(a). The same standard applies at the point of delivery as applies in-store.

501.145(3): Point-of-Delivery Verification -- Caregiving Institution Deliveries

(a) A Medical Marijuana Establishment delivering Medical-use Marijuana to a registered Caregiving Institution shall, at the point of delivery: (1) confirm that the authorized representative presents a current and valid Institutional Caregiver Registration Card; and (2) confirm through the Commission's Confidential Database that both the Institutional Caregiver's registration and the Caregiving Institution's registration are current and valid.

(b) Each delivery to a Caregiving Institution shall be accompanied by a patient manifest identifying: (1) each Registered Qualifying Patient for whom product is being delivered; (2) the quantity and type of Medical-use Marijuana attributable to each patient; and (3) the Caregiving Institution's registration number and the delivering Medical Marijuana Establishment's license number.

(c) The Institutional Caregiver shall sign the delivery manifest acknowledging receipt of the products identified therein.

(d) The delivering Medical Marijuana Establishment shall record the delivery transaction in the Commission's seed-to-sale tracking system and the Commission's Confidential Database, attributing products delivered and dispensing against each identified patient's allotment per the delivery manifest.

(e) The Institutional Caregiver shall log receipt of the delivery and subsequent administration to each patient in the patient's record maintained by the Caregiving Institution, consistent with 935 CMR 501.021(9).

Drafter's Note: Verification for CI deliveries uses the Institutional Caregiver Registration Card plus Confidential Database confirmation of both the IC and CI registration. No individual patient Registration Card or government-issued photo identification is required at the point of delivery -- the IC acts as the institution's authorized agent. Recording is required in both seed-to-sale and the Confidential Database to maintain inventory integrity and enforce patient allotment limits across all dispensing channels.

501.145(4): Personal Caregiver Ordering and Delivery Permutations

(a) A Personal Caregiver may place an order for Medical-use Marijuana on behalf of a Registered Qualifying Patient and may designate either the patient's residence or the caregiver's own residence as the delivery address.

(b) Point-of-delivery verification is determined by who receives the delivery. Whether the Registered Qualifying Patient or Personal Caregiver receives the delivery, verification is per the standard at 935 CMR 501.140(2)(a), applied using the receiving party's credentials.

(c) The Medical Marijuana Establishment shall confirm through the Commission's Confidential Database that both the patient's and caregiver's registrations are current and valid at the time of delivery, regardless of which party receives the delivery.

501.145(5): Third-Party Delivery Arrangements

(a) A Medical Marijuana Establishment authorized to deliver may deliver directly to authorized recipients using its own licensed delivery personnel and vehicles, consistent with its approved delivery Standard Operating Procedures.

(b) A Medical Marijuana Establishment may enter into a written delivery agreement with another Medical Marijuana Establishment authorized to deliver under 935 CMR 501.145. Any such agreement shall be disclosed to the Commission and shall comply with all applicable delivery requirements.

(c) A Medical Marijuana Establishment may enter into a written delivery agreement with a Marijuana Courier licensed under 935 CMR 500.000. A Marijuana Courier operating under a medical delivery agreement shall comply with the verification requirements of 935 CMR 501.145(2) or 935 CMR 501.145(3) as applicable and shall not deliver to any Consumer under such agreement.

(d) A delivery agreement shall at minimum: (1) identify the parties and their licensed premises; (2) specify the geographic scope of delivery; (3) address chain-of-custody, manifesting, and tracking responsibilities; (4) require compliance with 935 CMR 501.145(2) or 935 CMR 501.145(3) as applicable at point of delivery; and (5) be provided to the Commission upon request.

501.170: Municipal Requirements [AMENDED -- extended to all Medical Marijuana Establishments]

[Existing 501.170 retained and extended to all Medical Marijuana Establishments. The umbrella term captures any future license types authorized under M.G.L. c. 94I, § 7. All Medical Marijuana Establishments are subject to the same municipal requirements as Fully Integrated MTCs.]

501.180-501.181: Host Community Agreement and Equity Standards [AMENDED -- extended to all Medical Marijuana Establishments]

[Existing provisions retained and extended to all Medical Marijuana Establishments. The Commission shall: (a) develop a model host community agreement applicable to Medical Marijuana Establishments; (b) establish procedures and policies for municipalities to promote and encourage full participation in the regulated medical marijuana industry during HCA negotiations with Social Equity Businesses and Economic Empowerment Priority Applicants; and (c) promote and encourage full participation by people from communities disproportionately harmed by marijuana prohibition, consistent with M.G.L. c. 94I, § 7 and 935 CMR 501.050(3).]

501.200: Counties of Dukes County and Nantucket -- Transport of Medical-use Marijuana Over State Territorial Waters [AMENDED]

[Existing 501.200 is retained and amended to incorporate the following subsection governing overwater transport. This section establishes the operative regulatory standard; it supersedes Administrative Order No. 3 (June 13, 2024) with respect to Medical Marijuana Establishments licensed under 935 CMR

501.000 upon the effective date of this amendment. A parallel amendment to 935 CMR 500.200 is required to extend these standards to adult-use Marijuana Establishments; that amendment is not included in this redline.]

(3) Transport of Medical-use Marijuana Over State Territorial Waters.

(a) A Medical Marijuana Establishment licensed under 935 CMR 501.000 and located in or servicing the Counties of Dukes County or Nantucket may transport Medical-use Marijuana over State Territorial Waters on a Seaworthy Vessel, subject to the requirements of this subsection.

(b) Only a Seaworthy Vessel may be used to transport Medical-use Marijuana over State Territorial Waters. The Seaworthy Vessel must be inspected and approved by the Commission before the Medical Marijuana Establishment may commence transport.

(c) Prior to commencing transport, the Medical Marijuana Establishment shall submit a Standard Operating Procedure to the Commission describing its procedures for compliance with this subsection. Transport may not commence until the SOP is approved by the Commission and the Seaworthy Vessel has been inspected and approved.

(d) All transport routes shall remain within the Commonwealth of Massachusetts, including within State Territorial Waters. Route randomization is not required for overwater transport; however, the Medical Marijuana Establishment shall ensure that departure dates and times are randomized.

(e) A Medical Marijuana Establishment may hire or contract with a Captain who is not a Medical Marijuana Establishment Agent to navigate the Seaworthy Vessel. The Captain shall not have contact with or control of the Medical-use Marijuana, which shall remain under the control of the Medical Marijuana Establishment's Agent or Agents at all times during transport.

(f) A Seaworthy Vessel is not subject to Massachusetts Registry of Motor Vehicles requirements but shall comply with all applicable boat registration requirements. No Seaworthy Vessel shall bear any external marking indicating that it is used to transport Medical-use Marijuana.

(g) Medical-use Marijuana shall be secured in a locked storage compartment that is affixed to the Seaworthy Vessel and cannot be easily moved. The compartment shall be accessible only to authorized Medical Marijuana Establishment Agents during transport. Commission representatives, representatives of other state agencies, and emergency responders shall have access to the Seaworthy Vessel upon request.

(h) The Medical Marijuana Establishment shall develop and maintain emergency policies and procedures for securing all Medical-use Marijuana on the Seaworthy Vessel following any instance of diversion, theft, or loss.

(i) Medical-use Marijuana transported between the mainland and the Counties of Dukes County or Nantucket shall be tested by an Independent Testing Laboratory consistent with 935 CMR 501.160. Testing shall occur prior to transport.

Drafter's Note: This subsection incorporates the substance of Administrative Order No. 3 (June 13, 2024) into 935 CMR 501.000 with the full force of regulation. The administrative order was issued to address the lack of licensed cannabis access in Dukes County and Nantucket County and has been in effect since June 14, 2024. Codification eliminates the regulatory uncertainty inherent in reliance on an administrative order and provides licensees and the public with clear, stable regulatory standards. The security standard is articulated directly rather than by reference to the Alternative Security Provision process -- overwater transport is a well-defined and recurring operational scenario that warrants a specific regulatory standard, not case-by-case ASP review. A parallel amendment to 935 CMR 500.200 is required to extend these standards to adult-use Marijuana Establishments.

501.400 and 501.450: Grounds for Denial, Suspension, Revocation [AMENDED]

[Existing grounds (a) through (m) are retained with global conforming amendments. The following additional ground is added:]

(n) Acquiring Medical-use Marijuana or Finished Marijuana Products from an entity not authorized to supply Medical Marijuana Establishments under 935 CMR 501.106(2)(a).

Drafter's Note: Express enforcement ground for sourcing compliance. General non-compliance grounds would technically cover this but a specific ground provides clearer notice to licensees.

501.802: Suitability Standard for Registration as a Medical Marijuana Establishment Agent [AMENDED]

~~Suitability Standard for Registration as a Medical Marijuana Treatment Center Agent~~ -- section heading amended. Existing suitability standards retained and apply to all MME Agents of any Medical Marijuana Establishment. Enumeration of specific license types removed -- umbrella term captures any additional MME license types the Commission may authorize.

501.820: Confidentiality [AMENDED -- opt-in provider list added]

[935 CMR 501.820(1) — unchanged]

(2) The following records shall be deemed confidential and the Commission shall not disclose them except as provided in 935 CMR 501.820(3):

(a) *[unchanged]*

(b) All research submissions required under 935 CMR 500.147 pursuant to a research permit approved by the Commission relating to the medical use of marijuana by Qualifying Patients, including research protocols, data, findings, results, or reports submitted by a Marijuana Research Facility Licensee.

(c) Other identifying patient information. *[formerly (2)(b), renumbered]*

Drafter's Note: The introductory language of 501.820(2) is revised to clarify that records listed thereunder are deemed confidential and subject to disclosure only as provided in 501.820(3), closing a potential ambiguity in the prior text. A new 501.820(2)(b) designates research submissions relating to the medical use of marijuana by Qualifying Patients as confidential. The phrase "relating to the medical use of marijuana by Qualifying Patients" is intended to capture all research within the medical cannabis program — including research using de-identified or aggregate data — without requiring that Qualifying Patients participate directly as research subjects. Clinical trial submissions are the clearest application, as such records constitute records and communications related to qualifying patient care within the meaning of M.G.L. c. 94I, § 3(b). The basis for non-disclosure rests on three independent and mutually reinforcing grounds: (i) M.G.L. c. 94I, § 3(b) is itself a statutory declaration of confidentiality, providing that every registered qualifying patient shall have the right to confidentiality of all records and communications related to their care provided by a medical use marijuana licensee or establishment, which independently triggers Exemption (a) of the Public Records Law, M.G.L. c. 66, § 10, particularly for clinical trial and patient-linked research; (ii) this regulation implements § 3(b) and independently designates such research as confidential, providing a regulatory basis for Exemption (a) for the broader category of medical use research not directly involving patient care records; and (iii) the Commission's broad rulemaking authority under M.G.L. c. 94I and the catch-all provision of § 3(a) authorizing designation of pertinent information as confidential provide an independent basis for non-disclosure for any research not directly captured by § 3(b). Existing 501.820(2)(b) is renumbered (2)(c).

[935 CMR 501.820(3) — unchanged]

(4) Opt-In Certifying Healthcare Provider Public List. Notwithstanding the confidentiality provisions of 935 CMR 501.820, a Certifying Healthcare Provider registered under 935 CMR 501.000 may elect to have their name, specialty, and business contact information included on a publicly available provider list maintained by the Commission. Such election shall be made in writing in a form and manner determined by the Commission and may be withdrawn at any time. The Commission shall maintain and publish the provider list on its website. No other information about a registered Certifying Healthcare Provider shall be disclosed pursuant to this subsection.

Drafter's Note: 935 CMR 501.820(4) is added to establish an opt-in public list for Certifying Healthcare Providers. No publicly accessible list of registered CHPs currently exists. The opt-in mechanism allows providers who wish to be findable by patients to make their name, specialty, and business contact information publicly available while preserving confidentiality for those who do not opt in. The provision operates independently of the permitted disclosure framework in 501.820(3) — the Commission is not disclosing confidential information but rather facilitating a provider's voluntary election to appear on a separate public list. Existing 935 CMR 501.820(4) is renumbered (5).

(5) Nothing in 935 CMR 501.820 shall prevent the Commission from acting in accordance with its authority. *[formerly (4), renumbered]*

Drafter's Note: A corresponding confidentiality section, 935 CMR 500.820, should be added to the adult-use regulations to mirror the provisions of 935 CMR 501.820, with conforming changes appropriate to the adult-use framework.

IV. Minimum Necessary Amendments to 935 CMR 500.000

The following amendments to 935 CMR 500.000 are the minimum necessary to implement the transfer authorization between adult-use licensees and Medical Marijuana Establishments and to create the dosing limitation carve-out for the medical channel.

935 CMR 500.000: Transfer Authorization to Medical Marijuana Establishments [NEW PROVISION]

[The following new provision is added to 935 CMR 500.000 at a location to be determined by Commission legal staff consistent with the regulation's structure:]

Transfer Authorization to Medical Marijuana Establishments. A Marijuana Cultivator, Marijuana Product Manufacturer, or Marijuana Retailer licensed under 935 CMR 500.000 may Transfer Marijuana or Marijuana Products to a Medical Marijuana Establishment licensed under 935 CMR 501.000, subject to the requirements of 935 CMR 501.000. Such Transfers shall be documented in the Commission's seed-to-sale tracking system and accompanied by required manifests and testing documentation.

Drafter's Note: Targeted transfer authorization. Expanding the Marijuana Establishment definition in 935 CMR 500.002 to include MMEs would risk importing 500 requirements into the medical program and conflate two distinct statutory schemes -- MMEs under M.G.L. c. 94I and MEs under M.G.L. c. 94G. This provision achieves supply chain integration without that ambiguity.

935 CMR 500.130: Production and Transfer of Marijuana Products to Medical Marijuana Establishments [NEW SUBSECTION]

[The following new subsection is added to 935 CMR 500.130: Additional Operational Requirements for Marijuana Product Manufacturers:]

(x) Production and Transfer of Marijuana Products to Medical Marijuana Establishments. Dosing Limitation Carve-Out. Notwithstanding any per-serving or per-package dosing limitations otherwise applicable to Marijuana Products under 935 CMR 500.000, a Marijuana Product Manufacturer licensed under 935 CMR 500.000 may manufacture, produce, and transfer Marijuana Products in excess of those limitations, provided that: (a) such products are manufactured and produced exclusively for transfer to Medical Marijuana Establishments licensed under 935 CMR 501.000; (b) such products are transferred exclusively to Medical Marijuana Establishments licensed under 935 CMR 501.000 and are not transferred to any adult-use Marijuana Establishment or sold or distributed to any Consumer; (c) the transfer is documented in the Commission's seed-to-sale tracking system and accompanied by manifest and chain-of-custody documentation identifying the products as Medical-use Marijuana; and (d) the products are tested and labeled in compliance with 935 CMR 501.000 and applicable Commission testing protocols.

A Marijuana Product Manufacturer's authority under this subsection is limited to production for the medical channel and does not authorize the sale or distribution of such products through any adult-use retail channel.

Drafter's Note: Two authorizations required: production and transfer. Without production authorization, a 500-licensed MPM has no regulatory basis to produce above-cap products. Without transfer restriction, above-cap products could flow into the adult-use market. Together they create a closed medical channel. Corresponding enforcement ground at 935 CMR 500.450(x).

935 CMR 500.450: New Enforcement Ground [AMENDED]

[The following additional ground is added to 935 CMR 500.450: Marijuana Establishment License: Grounds for Suspension, Revocation and Denial of Renewal Applications:]

(x) Transferring Marijuana Products exceeding adult-use per-serving or per-package dosing limitations to any entity other than a Medical Marijuana Establishment licensed under 935 CMR 501.000, in violation of 935 CMR 500.130(x)(b).

Drafter's Note: Supply-side enforcement counterpart to 935 CMR 501.450(n). An MPM that diverts above-cap products to the adult-use market is subject to suspension, revocation, or denial of renewal.

V. Summary Table of Amended Sections

The following table summarizes all sections amended by this redline:

Section	Title	Summary of Changes
501.001	Purpose	Updated statutory references; session law citation (St. 2017, c. 55) struck per Regulations Manual; M.G.L. c. 6, § 223 added
501.002	Definitions	New: FIMTC, MMD, Medical Marijuana Establishment, MME Agent (umbrella), Executive Director, Social Equity Business, Medical-use Marijuana (consolidated); Amended: Commission, Qualifying Patient (no residency), Registration Card (physical or electronic), Caregiving Institution (expanded); Deleted: MIP; MTC simplified
501.003	CMOs	Updated to Medical Marijuana Establishment umbrella; both FIMTCs and MMDs eligible
501.005(1)	Fees -- FIMTC	No change
501.005(2)	Fees -- MMD	\$1,500 application / \$10,000 annual / \$5,000 change of location; full fee schedule
501.005(3)	Fees -- MMD Equity	Application fee waived; 50% annual reduction; SDO catch-all throughout
501.005(4)	Fees -- MME Agent	Lab Agent reference removed; \$115 initial and renewal; items corrected to (a)/(b)
501.005(5)	Fees -- CI / IC	\$500/\$300 CI; \$50/\$25 IC; items corrected to (a)-(f)
501.005(6)	Fees -- Certifying HCP	No fee
501.009 [NEW]	CHP 3-Year Renewal	Three-year renewal; attestation requirements; lapse rules; denial referred to Commission

501.010(10)	Pediatric Certification	Two Certifying Healthcare Providers (not Physicians only); MA licensed removed as redundant; parenthetical removed; specialty requirement retained
501.015	Patient Registration	Residency requirement and end-of-life carve-out struck; open enrollment
501.021	Caregiving Institutions	Facility enumeration removed from body; cross-ref to definition; (2) destruction obligation struck; (6) terminates replacing void language; ordering authority (7); on-site consumption (8); administration records (9); CI renewal (10)-(11)
501.022	Institutional Caregivers	(3) void replaced with terminates; promptly replacing one business day; (4) deleted -- superseded by (10); (7) available for inspection replacing carry Registration Card; IC in-person purchasing (9); IC renewal (10)-(11)
501.025	Responsibilities of Caregivers	501.025(2)(a) IC affirmative authority amended: in-person purchasing and ordering added as authorized activities with cross-references to operative sections; 501.025(1) and 501.025(2)(b)-(c) unchanged
501.029	ITL Agents	Streamlined to cross-reference 935 CMR 500.000
501.030	MME Agent Registration	Renamed; ED delegation added; suitability concerns referred to full Commission
501.040	Leadership Rating Program	Full text deleted; program was never implemented and MTC-specific structure is incompatible with new MME license framework
501.052	Independent Testing Laboratories	Streamlined to cross-reference 935 CMR 500.000; ITLs licensed exclusively under 500 since program transfer from DPH
501.032 [AMENDED]	Revocation of Registration	Conforming amendment: “Registration Card” replaced with “registration” throughout to align with registration-centered framework; logical reading order noted as denial (501.031), termination (501.033), suspension (501.036), revocation (501.032)
501.033 [AMENDED]	Termination of Registration	Full text replaced; “void” replaced with “terminates” throughout; recentered on registrations not cards; database update obligation added; residency trigger struck; personal caregiver termination corrected for multi-patient scenario
501.036 [NEW]	Suspension of Registration	New intermediate tool between denial and revocation; ED authority; database update operative mechanism; heightened protection for patient registrations; 90-day review requirement
501.034 [AMENDED]	Revocation and Voluntary Surrender - - CHP	Section heading updated; revocation grounds retained; voluntary surrender subsection added; surrender during pending proceedings noted in records
501.035 [DELETED]	Void Certifying Physician Registration	Full text deleted; “void” concept replaced by suspension framework at 501.037; section title was also a misnomer (applied to all CHPs, not just physicians); CSR suspension/revocation trigger moved to 501.037(1)(c)
501.037 [NEW]	CHP Suspension	Renamed from “Automatic Suspension”; triggers expanded to include CSR suspension/revocation; provider notifies patients within 5 business days; Commission backstop; reinstatement pathway

501.038 [NEW]	Action on Registrations	Ministerial issuance by ED; enumerated CIs ministerial; other entities require Commission vote for initial; all renewals ministerial; reporting at regular intervals
501.050	License Types / Caps / Equity	License type throughout; two license types; caps per H.5350; equity exclusivity with SDO catch-all; dosing limitations moved to 501.105 and 501.106
501.102	Action on Applications	Priority review for MMD applications; SDO catch-all
501.103	Licensure and Renewal	Permissive delegation to ED by vote; denial referral to full Commission; two votes required per M.G.L. c. 6, § 223(e). New subsections (5) and (6): delegation and conversion pathway from FIMTC to MMD -- not a new license; not subject to Social Equity exclusivity; ministerial ED approval; 36-month window
501.105	FIMTC Operational Requirements	Vertical integration not required; dispensing to patients, caregivers, ICs and CIs; dosing: adult-use caps inapplicable; may receive above-cap from 500 MPMs per 500.130; 501.105(j) struck
501.106 [NEW]	MMD Operational Requirements	Self-contained MMD operational section; sourcing: medical first (FIMTC, MMD), 500-licensed second; dosing: adult-use caps inapplicable; delivery as licensed activity; post-licensure delivery ED approval
501.120(g)	MMD Acquisition	Sourcing: medical sources first (FIMTC, MMD), 500-licensed second
501.140	Patient Sales	Authoritative recipient statement for all MMEs at (15): patients, personal caregivers, ICs acting for CIs; CI access framework at (16): ordering, IC in-person pickup, delivery
501.145	Patient Delivery	Statewide; no municipal opt-out; pre-verification eliminated; CI delivery: IC Registration Card + database confirmation + patient manifest + logging; personal caregiver: no post-delivery logging (intentional); personal caregiver ordering permutations; contracted delivery through other MMEs or licensed Couriers
501.170	Municipal Requirements	Extended to all Medical Marijuana Establishments
501.180-501.181	HCA / Equity	Extended to all Medical Marijuana Establishments
501.400, 501.450	Denial / Revocation	New ground (n): acquiring from unauthorized source
501.802	Suitability -- MME Agent	Renamed; license type enumeration removed
501.820	Confidentiality	New opt-in CHP public provider list; withdrawable at any time
500.000 Transfer Auth	500 -- Transfer to MMEs	Marijuana Cultivators, MPMs, and Marijuana Retailers may Transfer to MMEs; MMEs not characterized as Marijuana Establishments; M.G.L. c. 94G / c. 94I statutory distinction preserved
500.130(x)	500 -- MPM Dosing Carve-Out	Production authorization + transfer restriction: manufacture and transfer above-cap products exclusively to licensed MMEs; seed-to-sale; chain-of-custody; no adult-use channel
500.450(x)	500 -- MPM Enforcement	New ground: transferring above-cap products to unauthorized entity is grounds for suspension / revocation / denial of renewal

Global	Conforming Amendments	License type/types throughout; Medical Marijuana Establishments as umbrella; MTC Agent -> MME Agent; M.G.L. c. 10, § 76 -> M.G.L. c. 6, § 223; MIPs -> Marijuana Products; citation structure corrected per MA Regulations Manual hierarchy
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This redline is a draft for review and discussion purposes only.

DRAFT



Cannabis Control Commission

Public Meeting

August 13, 2026 at 10:00 am
Hybrid via Microsoft Teams



Agenda

1. Call to Order
2. Commissioners' Comments and Updates
3. Minutes
4. Executive Director and Commission Staff Report
5. Staff Recommendations on Change of Ownership
6. Staff Recommendations on Final Licenses
7. Staff Recommendations on Provisional Licenses
8. Commission Discussion and Votes
9. New Business Not Anticipated at the Time of Posting
10. Next Meeting Date
11. Adjournment



Commissioner Comments and Updates



Minutes

Minutes

1. July 9, 2026



Executive Director and Commission Staff Report

2026 Social Equity Program (SEP) Application Cycle

Application Period: September 1 – November 30, 2026

The Equity Programming and Community Outreach (EPCO) Department is preparing to launch the Commission's 2026 Social Equity Program (SEP) Application Cycle.

Applications will be submitted through the Massachusetts Cannabis Industry Portal (MassCIP) and reviewed on a rolling basis throughout the application period. To support prospective applicants, the Commission will provide comprehensive application resources and technical assistance to help individuals successfully navigate the application process.

Applicant Resources:

The Commission's Equity Programs webpage will provide prospective applicants with:

- Eligibility requirements and required documentation
- Application guidance, FAQs, and instructional video tutorials
- Technical assistance throughout the application period

Virtual Social Equity Program Application Help Clinics:

To assist prospective applicants, the EPCO Department will host four virtual Social Equity Program Application Clinics, providing an overview of the program, eligibility requirements, required documentation, application guidance, and live technical assistance to support successful application submission.

Scheduled Clinics:

Wednesday, August 26, 2026,

Wednesday, October 21, 2026

Wednesday, September 16, 2026,

Wednesday, November 18, 2026





Host Community Municipal Equity Update

Host Community Municipal Equity Data | Aug. 13, 2026

Overview	Total
The total number of applications received since May 21, 2024	59*
Accepted/Compliant HCMEs	41*
Number of HCME applications that have been re-opened	15
Pending review	3
40 Towns Compliant with HCME Requirements <i>Amesbury, Belmont, Bourne, Brimfield, Brockton, Brookline, Cambridge, Charlemont, Charlton, Dartmouth, Essex, Framingham, Franklin, Groton, Hanson, Haverhill, Holliston, Holyoke, Lakeville, Lanesborough, Lee, Lynn, Maynard, Medford, Melrose, Merrimac, Monson, Newton, Northampton, Palmer, Pittsfield, Rockland, Sheffield, Shirley, Shrewsbury, Somerville, Swansea, West Tisbury, Westfield</i>	

**Of the submissions received and accepted, one was from a municipality that is not a Host Community and thus, not subject to Commission regulations. That municipality submitted its town bylaws and ordinances regarding its town-wide ban on Marijuana licenses.*



HCME: Compliance Review Trends

- HCs selecting the wrong option within MassCIP:
 - Local Approval 1:1 Basis
 - SE Exclusivity
 - Model Ordinance
 - Another process
- HCs need to demonstrate *where* required information is posted (e.g., website, photo)
 - Equity Plan, applicant pool data, all required steps of local approval process
- HCs need to provide goals and how those goals will be measured to assess their efforts to promote equity participation
- HCA processes are *part* of HCME but does not by itself demonstrate a municipality meeting minimal municipal equity requirements.
- HCs must indicate how it will evaluate and score applicants





Social Consumption Regulatory Implementation Project

Project Timeline



COMPLETE

- ✓ RVT Application – launch end of August
- ✓ HCA Model Template Updates
- ✓ Supplemental License Application Draft
- ✓ First Local Advisory WG Stakeholder Engagement
- ✓ EPCO Requirements Identified & Incorporated

In Progress

- RVT Trainer Compliance Audit Process
- RVT Program – Future State Assessment
- ✓ HCA Guidance Updates
- ✓ License Automation Assessment
- ✓ Supplemental Inspection Framework & Resources
- ✓ Consumer Education Content
- ✓ Existing Operational Process Review & Updates
- ✓ Public Education Budget Planning

Next Steps

- Launch RVT Trainer Application & Implement Compliance Audit Process
- Finalize Supplemental License Application and Launch by End of December
- Complete updates to all internal processes, documents, and hold staff trainings
- Start Scoping Hospitality License Requirements
- Publish Public Education Materials

Key Risks / Considerations

- **Critical Resource Capacity Constraints:** Changes in staffing levels and team capacity present a significant risk, impacting knowledge retention, workload distribution, and timely completion of deliverables
- **Technology Requirements:** Automation opportunities have been identified, but limited capacity to complete may impact the speed at which solutions are developed and deployed
- **Expanding Initiatives:** Additional initiatives create competing demands for resources, increasing the need for cross-project coordination
- **Project Management Resources:** This complex initiative relies on manual processes rather than integrated project management tools, increasing coordination efforts and creating additional administrative burden





Secret Shopper Pilot

Audit Criteria and Sampling

- **Criteria:**

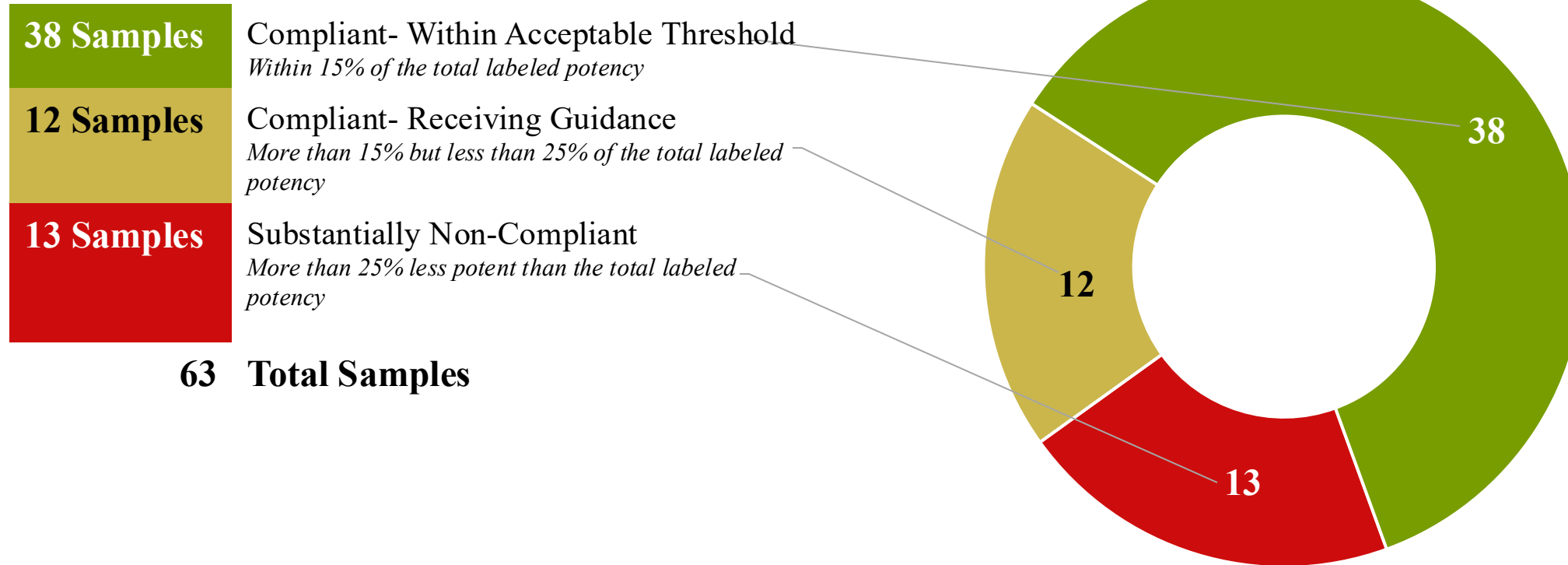
- Retail available flower products (buds or pre-rolls)
- Tested by an ITL no more than 90 days before audit

- **Sampling:**

- Acquired 63 samples produced by 62 licensees
- Minimum 10 grams from the same batch
- Submitted to the original ITL as a blind sample



Potency Results of Samples Tested in Secret Shopper Pilot



Audit Enforcement

- Licensees subject to an audit will receive a notice with the results of the audit
 - Licensees subject to the audit with results +/- 25% will receive a notice with next steps and options for the Licensee
- Options include:
 - Destroy
 - Recall and Repurpose
 - Recall and Relabel
 - Retest





Licensing Data Updates

Commence Operations| August 13, 2026

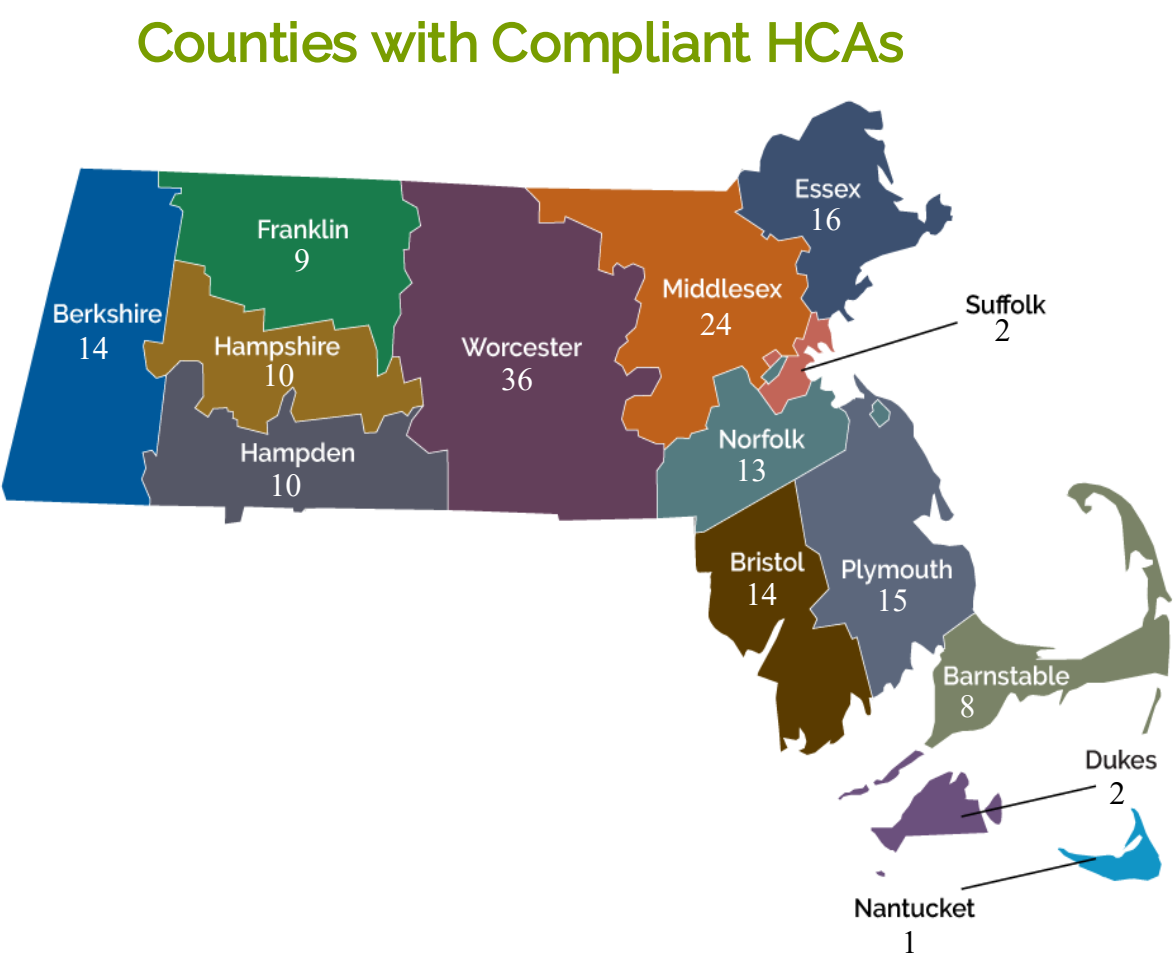
The totals below are a snapshot of current Commence Operations licensees.

Type	#
Commence Operations (all-time, all statuses)	803
Active Commence Operations	691



Host Community Agreements Data | August 13, 2026

Overview	Total	SEP & EEA	DBE
The total number of applications received since March 1, 2024, containing an HCA	1,902	331	169
Number of Model HCAs received	483	50	48
Compliant Model HCAs	464	46	48
Number of Model HCA Waivers received	257	66	20
Compliant HCAs	1,726	297	152
Non-Compliant HCAs	106	16	13



Extension Requests Data | August 13, 2026

Extensions	Total
Extension requests received	3,064
Extension requests that received conditional pre-approval	48
Extension requests granted	2,854
Average number of days requested	86



Staff Recommendations on Change of Ownership

Staff Recommendations on Change of Ownership

1. Analytics Labs LLC
2. Ascend Mass, LLC
3. Southcoast Apothecary LLC
4. Temescal Wellness of Massachusetts LLC



Staff Recommendations on Final Licenses

Staff Recommendations on Final Licenses

1. 686 Cultivation LLC (#MC283899), Cultivator- Tier 2, Indoor
2. ACMJ, Inc (#MC283322) Cultivator, Tier 1, Indoor
3. Cedar Roots, LLC (#MP281872) Product Manufacturer
4. Core Empowerment, LLC (#MR285081) Retail
5. Great Northern Wellness, LLC (#MR285477) Retail
6. Mellow Tiger, LLC (#MR285096) Retail
7. Porter Square Remedies, LLC (#MR284796) Retail





Staff Recommendations on Provisional Licenses

Staff Recommendations on Provisional Licenses

1. GodsendHP, Inc. (#MRN285437) Retail
2. Grateful Delivery, LLC (#DOA100192) Marijuana Courier
3. Hardwick Mill Greenery, Inc. (#MPN282387) Product Manufacturer
4. M1 Enterprises, LLC (MCN284013) Cultivator – Tier 3 Indoor
5. Pioneer Valley Trading Company, Inc. (#MCN284021) Cultivator Tier 2, Indoor
6. Pioneer Valley Trading Company, Inc. (#MCN284022) Cultivator Tier 6, Outdoor
7. Pioneer Valley Trading Company, Inc. (#MPN282390) Product Manufacturer
8. Route 133 Cannabis, LLC (#MRN285509) Retail
9. Westfield Ultra Premium, LLC (#RMDA4445) Medical Marijuana Treatment Center





Commission Discussion and Votes

Commission Discussion and Votes

1. Administrative License Extension Discussion
2. Tier Expansion Discussion
3. Chapter 65 Emergency Regulations Policy Questions
4. Discussion of Chapter 65 Fall Regulatory Round
5. Triannual Review of Executive Session Minutes





Chapter 65 Emergency Regulations Policy Questions

Ch. 65 Emergency Regulations Policy Questions

Ch. 65, § 36: License Cap Exemption and Ownership and Control (Equity interest of less than 20%)

1. Whether to remove all amendments related to § 36 from the final emergency regulation package, but continue to work through policy considerations to implement § 36, specifically, the criteria to determine "direct and indirect control", in the Fall Regulatory Round to clarify exactly which persons or entities are eligible for the license cap exemption?
2. Whether to keep the emergency regulations as drafted, where equity has been interpreted to encompass only a financial/economic interest, but not a voting interest, so long as the person or entity does not otherwise have direct or indirect control?
3. Whether to amend the emergency regulations to reflect that equity has been interpreted to encompass both a financial/economic interest and a voting interest, so long as the person or entity does not otherwise have direct or indirect control?

Commission Discussion and Votes

4. Discussion of Chapter 65 Fall Regulatory Round



Regulatory Preview

- Overview
- Medical Regulations
- Testing Regulations and Protocols
- Outstanding Policy Questions



Testing Public Hearing and Public Comment Period

- Chapter 65 of the Acts of 2026 requirement for Public Hearing on Testing for review of testing regulations and protocol.
- Stakeholders may submit written comments via email at Commission@CCCMass.com with the subject line “Testing” starting on Wednesday, August 5 until 5 p.m. on Tuesday, August 25, 2026.
- The Commission will host a public hearing beginning at 10:30 a.m. on August 25, 2026 at the agency's Union Station Headquarters.



Discussion of Fall Regulatory Round Potential Topics

Advertising/Discounts/Loyalty Programs:

1. Whether to allow licensees the ability to permit advertising, marketing, and branding of sales, discounts and customer loyalty programs within an ME/MME or through an opt-in email list? [Chapter 65 § 21]
2. Whether to allow advertising “*within*” and ME and MME’s by allowing this type of communications on ME’s/MME’s websites? [Chapter 65 § 21]

Delivery – Municipal Opt Out:

3. Whether municipal waivers occur after the initial two-year period required by the new law? [Chapter 65 § 25]

Authorizing Sale of Marijuana Seeds:

4. Whether to allow MEs or MMEs to sell marijuana seeds? [Chapter 65 § 12]



Discussion of Fall Regulatory Round Potential Topics

State-wide Industry License Caps:

5. Whether to limit the total number of licenses in both adult-use and medical-use programs overall? Or whether to expressly promulgate regulations that state that the Commission may limit the total number of licenses in each license type and class? [Chapter 65 § 19]

Transporter Revision:

6. Whether to combine the two transporter licenses into one Marijuana Transporter License? [Not Chapter 65]

Island Transportation:

7. Whether to incorporate Executive Order Number 3 into the regulations? [Not Chapter 65]

Agent Registration:

8. Whether to amend agent registration license to be agent-centric and portable across employers and licenses or to keep the current allowance for the same badge for agents working for persons or entities with direct and indirect control? [Not Chapter 65]
9. Whether to align or amend ME and MME agent fees? [Not Chapter 65]



Discussion of Fall Regulatory Round Potential Topics

RVT:

10. Whether to amend the annual training requirement? [Not Chapter 65].

Enforcement:

11. Whether to amend notice of deficiency regulations to state that the Commission "may" issue as opposed to "shall" issue to align with other enforcement actions in regulation? [Not Chapter 65]

Commission Discussion and Votes

5. Triannual Review of Executive Session Minutes





**The Commission is in
Executive Session**



Upcoming Meetings & Adjournment

Upcoming Meetings and Important Dates

Next Meeting Date

August 25, 2026
Public Meeting
Hybrid via Teams
10:00 am

August 25, 2026
Public Hearing
Hybrid via Teams
10:30 am

2026 Public Meetings*
September 17
October 8
November 12
December 10

**Public Meeting dates are tentative and subject to change*



Testing Public Hearing and Public Comment Period

- Chapter 65 of the Acts of 2026 requirement for Public Hearing on Testing for review of testing regulations and protocol.
- Stakeholders may submit written comments via email at Commission@CCCMass.com with the subject line “Testing” starting on Wednesday, August 5 until 5 p.m. on Tuesday, August 25, 2026.
- The Commission will host a public hearing beginning at 10 a.m. on August 25, 2026 at the agency's Union Station Headquarters.





Additional Licensing Data

Licensing Applications | August 13, 2026



Licensing Applications | August 13, 2026

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Active Commence Operation	Total
Craft Marijuana Cooperative	2	N/A	0	0	4	0	0	0	6
Marijuana Courier License	23	N/A	0	0	17	1	14	9	55
Marijuana Courier Pre-Certification	22	131	0	N/A	N/A	N/A	N/A	N/A	153
Independent Testing Laboratory	1	N/A	0	2	2	0	16	10	21
Marijuana Cultivator	57	N/A	2	42	185	14	154	122	454
Marijuana Delivery Operator License	10	N/A	0	0	23	0	21	16	54
Marijuana Delivery Operator Pre-Certification	19	122	0	N/A	N/A	N/A	N/A	N/A	141
Marijuana Microbusiness	8	N/A	0	4	21	2	16	12	51
Marijuana Product Manufacturer	33	N/A	1	47	127	18	134	110	360
Marijuana Research Facility	5	N/A	0	1	0	1	0	0	7
Marijuana Retailer	43	N/A	2	29	110	4	439	406	627
Marijuana Transporter with Other Existing ME License	4	N/A	0	3	4	0	4	3	15
Microbusiness Delivery Endorsement	1	5	0	0	0	0	2	0	8
Third Party Transporter	17	N/A	0	0	2	0	5	3	24
Standards Laboratory	0	N/A	0	0	0	0	0	0	0
Medical Marijuana Establishment	13	N/A	0	1	0	0	94	91	108
Total	258	258	5	129	495	40	899	782	2,084

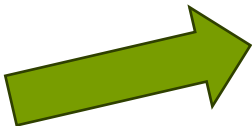


Licensing Applications | August 13, 2026

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

The 2,010 applications represent 1,171 separate entities

Type	#
MTC Priority	265
Economic Empowerment Priority	143
Expedited Review	823
General Applicant	779
Total	2,010



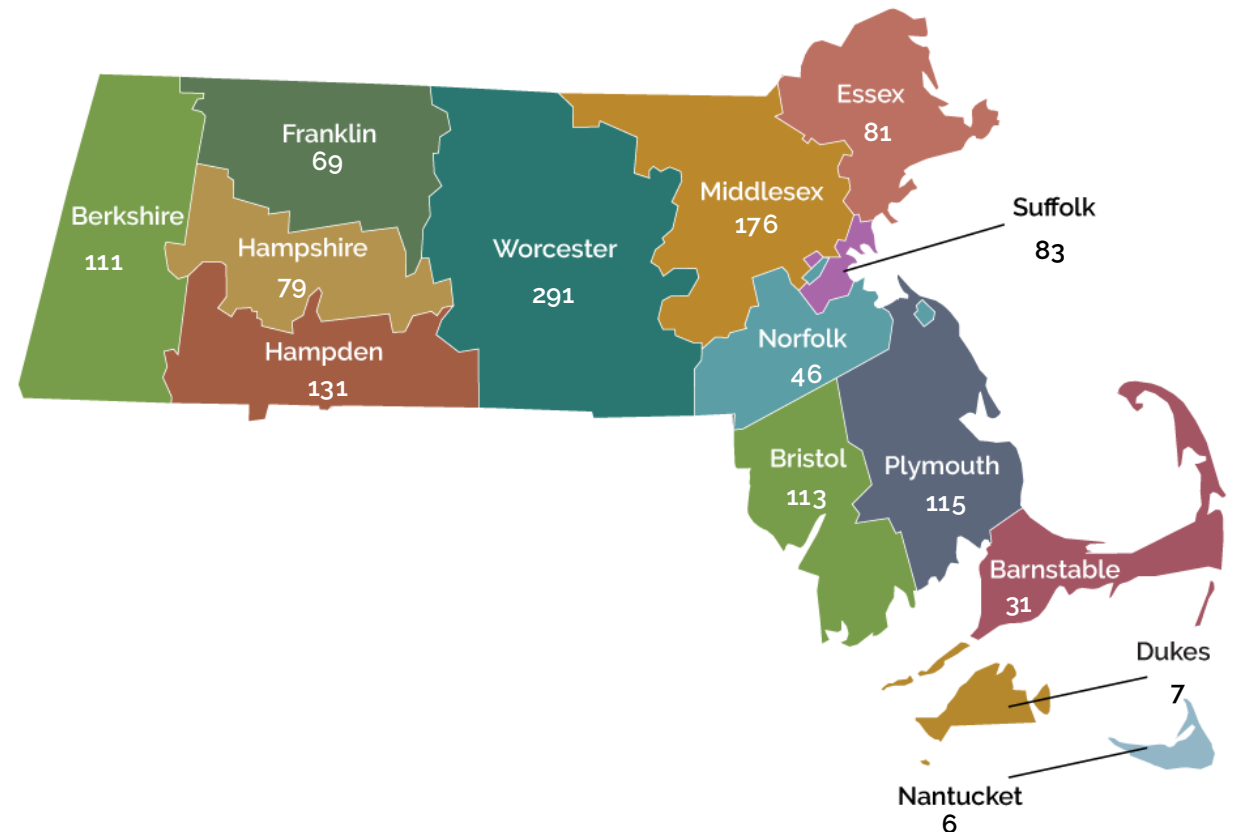
Type	#
Expedited: License Type	92
Expedited: Social Equity Participant	450
Expedited: Disadvantaged Business Enterprise	193
Expedited: Two or More Categories	88
Total	823



Marijuana Establishment Licenses | August 13, 2026

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

County	#	+/-
Barnstable	31	0
Berkshire	111	0
Bristol	113	1
Dukes	7	0
Essex	81	0
Franklin	69	0
Hampden	131	0
Hampshire	79	0
Middlesex	176	0
Nantucket	6	0
Norfolk	46	0
Plymouth	115	0
Suffolk	83	2
Worcester	291	0
Total	1,339	3



Ch. 65 Municipal Waiver Requests

As of July 2, 2026, the following [Waiver Requests](#) have been received and are reflected on the Commission's [Municipal Zoning Tracker](#):

Town Name	Waiver Number	Date Received	Effective Date	Expiration of Waiver
Westborough	DW-2026-001	5/27/2026	6/5/2026	6/5/2028
Needham	DW-2026-002	6/1/2026	6/5/2026	6/5/2028
Hampden	DW-2026-003	6/2/2026	6/5/2026	6/5/2028
Hopkinton	DW-2026-004	6/8/2026	6/8/2026	6/8/2028
Lincoln	DW-2026-005	6/9/2026	6/9/2026	6/9/2027
Holden	DW-2026-006	6/10/2026	6/10/2026	6/10/2028
Avon	DW-2026-007	6/10/2026	6/10/2026	6/10/2028
Foxborough	DW-2026-008	6/11/2026	6/16/2026	6/16/2028
Middleton	DW-2026-009	6/17/2026	6/24/2026	6/24/2028
Medfield	DW-2026-010	6/23/2026	6/24/2026	6/24/2028
Wayland	DW-2026-011	6/23/2026	6/24/2026	6/24/2028





**The Commission is in recess
until 11:45**