

SIRA NATURALS, INC.

MC281252

MP281303

MX281310

ESTABLISHMENT OVERVIEW

1. Name of the Marijuana Establishment:

SIRA Naturals, Inc.

2. Address of the Marijuana Establishment:

13 Commercial Way, Milford, MA 01757

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

Cultivation, Tier 3—Indoor Operation (10,001 – 20,000 sq. ft)

Product Manufacturer

Transporter with Other Existing ME License

LICENSING OVERVIEW

4. The licensee was granted provisional licenses by the Commission for the following Marijuana Establishment license types:
 - a. Cultivation (approved on June 21, 2018); and
 - b. Product Manufacturer and Transporter with Other Existing ME License (approved on July 2, 2018).
5. The licensee has paid all applicable license fees.
6. Commission staff were notified of a proposed future change to the organizational structure of the Marijuana Establishment. The proposed change may be finalized within the next two to three months.
7. No new information has been discovered by Commission staff regarding the suitability of the licensee or the individuals and entities previously disclosed since the issuance of the provisional licenses.

INSPECTION OVERVIEW

8. The initial inspection took place at the facility on September 28, 2018.
9. The licensee's Marijuana Establishments were inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishments were not in compliance with all applicable state and local codes, bylaws, ordinances, and regulations.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

All persons arriving at the establishment must enter through the front entrance, where they are greeted by security receptionists. The initial enclosure is where the security receptionist reviews and maintains visitor logs. All other areas of the building, besides reception, are limited access areas. All limited access doors were marked with the appropriate signage. All doors were locked using a proxy card reader system. The proxy card carried by individual agents only allows access to rooms that they are allowed to enter for work purposes.

Burglary and fire alarms are monitored by a private security company. A security assessment of the premises is conducted every month. The same security company has installed glass break alarms, panic alarms, and motion detectors in the Marijuana Establishment.

Enforcement staff inspected the cameras and monitors onsite. Enforcement staff was provided with schematic diagrams showing placement of cameras and other security devices in and around the establishment. The camera system produces high-quality images. Enforcement staff tested the system and ensured that time and date stamps are accurate, that clear video images are displayed in real time, and that a still photo can be printed from a video file. Surveillance video recordings are kept locally as well as off-site in cloud storage. No deficiencies were found in the camera system. In case of a power outage, the facility can remain operational using an uninterrupted power supply and a Cummins diesel generator.

- b. Inventory and Storage

All areas where marijuana is stored were clean with no visible evidence of pests. Curing rooms appeared to be well-tended, but no product was presently curing at the time of inspection.

- c. Cultivation Operation (if applicable)

The cultivation area was divided into 11 rooms: one (1) mother room, two (2) vegetative rooms, and eight (8) flowering rooms. Enforcement staff measured the actual canopy of the facility, which is as follows:

Mother Rooms (1)	330 sq. ft.
Flowering Rooms (8)	10,684 sq. ft.
Vegetative Rooms (2)	929 sq. ft.
Empty Rooms (3)	1,609 sq. ft.
TOTAL CANOPY	13,552 sq. ft.

The establishment has been issued a Tier 3 provisional cultivation license (10,001 sq. ft. – 20,000 sq. ft.). The total canopy falls within this tier.

d. Product Manufacturing Operation (if applicable)

The product manufacture area is a commercial kitchen that manufactures edible products which were indicated in the product manufacturing license application. Detailed standard operating procedures were presented at the start of the inspection. The kitchen manager is a former commercial baker who presented a certificate indicating she received required training in food safety and surveillance for communicable diseases. The kitchen area was clean and in compliance with Commission regulations.

e. Retail Operation (if applicable)

Not applicable.

f. Transportation

The establishment uses one vehicle for transportation of marijuana and marijuana products. The vehicle is equipped with a video surveillance camera, with video files stored to an SD card. The vehicle is equipped with GPS tracking. All transportation logs and manifests were properly completed and in compliance with 935 CMR 500.105(13).

RECOMMENDATION

Commission staff recommends issuing final licenses for the above Marijuana Establishments with the following conditions:

1. The licensee may cultivate, harvest, possess, prepare, produce, and otherwise acquire marijuana, but shall not sell, or otherwise transport marijuana to other Marijuana Establishments, until upon inspection, receiving permission from the Commission to commence full operations;

2. The licensee is subject to inspection and audit to ascertain compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable;
3. The licensee remains suitable for licensure pursuant to 935 CMR 500.102(1)(a)(2);
4. The licensee shall cooperate with and provide information to Commission investigators, agents, and employees upon request; and
5. The licensee shall demonstrate that it is in compliance with or has obtained applicable waivers or approvals from the Department of Public Health, as necessary, and provide documents as the Commission may request prior to commencing operations.

This recommendation was based on the licensee's demonstrated compliance with the laws and regulations of the Commonwealth, suitability for licensure, and upon the inspection(s) of the licensee's Marijuana Establishments.

Commission staff certify that a due diligence review of the licensee's Marijuana Establishments were performed. As of this date, the licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Accordingly, the licensee is recommended for final licensure for the Marijuana Establishments with the previously mentioned conditions.

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