

Time	Under what conditions should the Commission allow the sale of vaporizer products that were prohibited for sale or subjected to quarantine between September 25, 2019 and December 12, 2019? Where applicable, please provide a rationale for or evidence of your position.	Name (optional) (First)	Name (optional) (Last)	Role/Title (optional)	City/Town (optional)	State (optional)	Email (optional)	Phone Number (optional)
7/2/2020 15:26	If they passed testing, there should be no reason why they can't be sold. If they are close to expiration, the dates of expiry should be extended as oils and concentrates don't really expire or go bad. When I worked in the Colorado cannabis industry for many years, it was not required by the state to have expiration dates on concentrates/oils/vapes. We need to copy more of what they did but I will admit there are a few things here I like that Colorado does not do.	Tony	L.	Dispensary General Manager	Beverly	Massachusetts	atlipari@gmail.com	5162321777
7/2/2020 15:27	Should 110% percent be reopened to Proper testing of both tanks and oils going Into them is sufficient. They are safer than smoking				Randolph	MA		
7/2/2020 15:27	I depend solely on the vaporizing method for my medical marijuana and since the quarantine of said vape products have had to resort to black market vape products. Please reconsider Bakers orders thank you.	Jeffrey	Hermanson		Gardner	Ma.	marmon9610@yahoo.com	9786321636
7/2/2020 15:28	Given that the quarantined products met the requirements for distribution prior to the quarantine, and continue to meet the requirements (they haven't changed, have they?), I think forcing that much product (what, \$40 million or so?) to go to waste is shameful and wasteful. On top of the financial burden on the industry from the coronavirus pandemic, not allowing sale of this product could well be a death blow to many entrepreneurs.	John	Griswold		Ayer	MA	johngriswold@yahoo.com	

7/2/2020 15:29	<p>Test the vaporizers for Vitamin E acetate if there is none present sell the vapes.</p> <p>Every market in the United States is selling vaporizers and testing for Vitamin E, why would you take a very important form of administration away from patients?</p> <p>If Mass is truly a medical cannabis state then they need to provide for the patients!</p>							
7/2/2020 15:39	They have subsequently tested negative for now prohibited additives, and are sold at a significantly lower price, with the product status as previously prohibited prominently displayed.							
7/2/2020 15:55	Retesting of the product prior to selling.							
7/2/2020 16:02	Not only the product in the cartridge but the cartridges themselves need to have a standard of quality and forced by the commission. As a student and a cannabis colony recourse we got to speak with the people from embassy our lives and the amount of lead and other pollutants that could be possible inside the cartridge is the way the cartridges of built needs to be rectified before sale.	J.	Leone		Holyoke	MA	its.j.leone@gmail.com	18022808512
7/2/2020 16:03	Sale should be allowed. Warnings should be attached and product sold for an appropriate amount.	Al	Silvia					

7/2/2020 16:10	<p>The Green Lady Dispensary had only 2 Pax Pods at the time when the quarantine went into effect so thankfully, we did not have valuable inventory tied up in the time frame you are mentioning.</p> <p>However, I would like to take a moment of your time to sincerely request that we are allowed to get vape products back on the shelves for sale. I have been working diligently for almost 7 months on submitting a plan that protects the public health and allows residents of Nantucket to have safe access to vape products. If they can't access it legally, they will purchase from the black market or online, and we all know those are the most dangerous contaminated products around. Additionally, the Green Lady has a significant financial hit from not being able to participate in vape sales like the rest of the state.</p> <p>We have invested in expensive liquid chromatography testing equipment that can test for VEA. And we have worked out a method with Chris Hudalla from ProVerde labs to test cartridges/pods with a surrogate oil to see if leaching of heavy metals is occurring. These steps are in an SOP that was provided to our Investigator.</p> <p>Additionally, all products made in Nantucket must state 'WARNING: LIMITED TESTING FOR CONTAMINANTS AND PESTICIDES' because the regulations contemplated that Dukes and Nantucket County would need different testing guidelines so as not to ship product over Federal waters.</p> <p>I would welcome the opportunity to speak with anyone at the CCC who might want to follow up on this or learn more about how diligently we work at The Green Lady to produce top quality products for our community.</p> <p>Sincerely, Nicole</p>	Nicole	Campbell	Owner	Nantucket	MA	nicole@thegreenladydispensary.com	9144905426
7/2/2020 16:11	<p>I strongly believe that vaporized products should NOT be allowed. There is an epidemic of children and young adults using these products. As a parent, and marijuana lover, I strongly ask you to NOT allow vaporized products be allowed to be sold or distributed. Thank you</p>							

7/2/2020 16:12	<p>First of all, the reasons for the prohibition were to save lives. Good. However, the causative agent of these fatalities was not ascertained at the time. The actual cause of the fatalities was not vaping per se, but the addition of vitamin E--a contaminant--to an unregulated nicotine product. Unlike tobacco products such as cigarettes which are regulated (although many additives are in a cigarette supplementing the tobacco). That's where the fault of this lies--not vaping per se, but the contaminants and lack of quality/safety controls. The nicotine vaping companies got into the marketplace before government could regulate or institute safety inspections. Remember how they said it would help people quit cigarettes? That was a lie, I was one of many who tried only to find it made us more addicted because the nicotine levels were higher than low-tar cigarettes. Governor Baker should be commended for his attention to this issue in a timely way. Probably saved lives. I do think he employed a axe when in hindsight we needed a scalpel. But now it's time to make a correction and do the right thing. Personally, I'm in favor of eradicating all nicotine products for the benefits of public health. But that's not the question, it's about vaping. My take would be why allow for another product that leads to addiction and dire health consequences. Vaping is not the culprit.</p> <p>When it comes to cannabis vaping that should never have been prohibited in Massachusetts. This was/is peoples' medicine. I vape cannabis on a daily basis. That's also the reason why I shop cannabis, not in Massachusetts, but in Rhode Island. They have quality control, so there was no risk of contamination. Rhode Island saw and acted on, to the benefit of us patients, for the reasons given in the previous paragraphs.</p>	Mark	Leeuwenburgh	Citizen / Patient	Seekonk	Massachusetts	mleeuwenburgh@comcast.net	5087614887
7/2/2020 16:12	<p>These vaporizers should be retested for heavy metals and vitamin e acetate and allowed to be sold if the results of this analysis indicate no contamination.</p> <p>These were the only contaminants of concern and no samples from a licensed operator contained vitamin e acetate.</p> <p>The ITL system is already relied on to determine product safety and the commission found no vitamin e acetate in their testing. The fact that the vaporizers have been under quarantine this long without action or demonstrable cause is absurd and poses an unreasonable burden on operators. The COVID shutdown has only compounded this financial damage.</p>	Louis	Silverstone	Compliance Officer	Easthampton	Massachusetts	lsilverstone@myinsa.com	

7/2/2020 16:20	<p>I would hope that the vaporized products can be submitted to an independent laboratory that the commission specifies for testing for Vitamin E and other contaminants to approve them for sale. And if the heavy metal contaminants increase with time, then all cartridges could be marked with a "use by or destroy" date.</p> <p>It did appear that the majority of the toxic vaporization products were black market and not through certified cannabis stores. As a physician, I certify a small number of my patients for medical cannabis and am supportive of, though not an enthusiast for, the medical use of cannabis. A relatively small number of my patients appear to have benefited from medical cannabis use, and vaporization is certainly one of the better delivery methods.</p>	STEVEN	KANNER	Physician, Orchard Health Care	Waltham	MA	drkanner@orchardhealthcare.com	7816840600
7/2/2020 16:40	I think the bad was unfounded as medical/recreational cannabis products are lab tested and were already held to a high standard for safety.	Andrew	Origlio					
7/2/2020 16:58	I believe the vaping to be good if used in the correct manner. Im my opinion for my own self. I believe it is more discreet for adults alike when you minor children around. This way its not as potent as regular marijuana. Which should be used privately and not out in public places.							
7/2/2020 17:53	<p>The only cannabis vaporizer product I prefer is one of pure cannabis oil extracted by a CO2 process. The process that uses butane to extract is also well received but I haven't tried to compare.</p> <p>Any vaporizer product that contains Vitamin E acetate, man-made chemicals or anything other than pure cannabis oil extract I would discard due to known & unknown health hazards.</p>	Ariane	Blanchard		Great Barrington	MA	arianecb44@gmail.com	

7/2/2020 18:41	<p>Hello, my name is Carlos Brantley. I started using cannabis in my mid-20s for help with chemotherapy and then worked in the industry for 3 years in Seattle, WA. I've recently returned to New England and would love to help and consult.</p> <p>Given that the cartridges contaminated with Vitamin E Acetate were from the black market, it follows that people are willing to take the inherent risks of contaminants in cartridges. This is not dissimilar to the potential additives and contaminate in cigarettes. Thus, as long as the cartridges are accompanied with a visible disclaimer (ie "During the Commission's investigation, some samples collected and tested from the same production batch produced disparate results or findings. While an initial test may have identified impermissible levels of lead, well above those levels that are deemed safe for inhalation or ingestion (500 - 1,000 parts per billion), subsequent tests would return a result of non-detect or as having registered lower than could be detected with the lab's methodology or instrumentation. The Commission has not tested every production batch currently under quarantine, but instead has chosen a representative sample. Additionally, the quarantined products have not been tested for all possible containments. There are no state or national studies that provide proof that these products do not pose a risk to public health, safety, and welfare.") then the cartridges should be allowed to be sold and purchased. The test results should be viewable and posted online (as should any and all cannabis test results, if they aren't already). The pricing for the cartridges should only reflect cost and taxes, so that they can be removed as soon as possible from the inventory and to remove the burden of businesses.</p>	Carlos	Brantley	Cannabis Industry Consultant			brantleyca@me.com	
7/2/2020 18:49	<p>I have no idea what the product for sale is made of and what is in it other than partial /THC if made correctly pure THC is not harmful CO2 extraction are best for goes other filters using alcohol however our laws only allow alcohol , which is stupid , I say throw it all out as trash , and start allowing CO2 extraction for THC oil , the term terps are not hinder by this extraction since their was deaths because people were vaporizing with un- pure products THE CCC has no choice but trash it all ,</p> <p>MassVocals</p>	Steven	DRury	MassVocals	Templeton , mass	MA	massvocals@comcast.net	9789399999

7/2/2020 18:58	<p>The only cannabis vaporizer product I prefer is one of pure cannabis oil extracted by a CO2 process. The process that uses butane to extract is also well received but I haven't tried to compare.</p> <p>Any vaporizer product that contains Vitamin E acetate, man-made chemicals or anything other than pure cannabis oil extract I would discard due to known & unknown health hazards.</p>	Ariane	Blanchard		Great Barrington	MA	arianecb44@gmail.com	
7/2/2020 19:54	<p>If the product goes through a second round of testing and is deemed satisfactory in the required standards, then it should be available for sale, right away. However, we should clearly understand the exact conditions the product was kept in while in quarantine, before testing. For example, if an licensee kept them at room temperature for the last 6 months, or how long the concentrate has been exposed to certain internal hardware.</p> <p>I'm pretty sure USA made cartridge hardware is way more expensive than China made hardware. Many companies use CCell and other cartridge technologies. So in terms of public health, I believe a. Ore comprehensive testing is required.</p> <p>For licenses, it may not be an ideal business decision as the additional cost of testing 6 month old product may dilute the attractiveness for a customer who can get a newer product. However, they may have to decrease the price of the product and break even, make less profit or recoup a portion of their losses, and lastly perhaps a complete loss and deeming the product a total waste if the quarantine reprocess is not worth the time.</p> <p>All in all, I believe a comprehensive lab test that tells us more than the normal tests do, would encourage customers to try an older batch, perhaps like an aged wine., I know it doesn't necessarily work like that with cannabis.</p> <p>However, it would be reassuring to know extra care has gone in to make sure these products are safe. Lastly, the transparency should be there for customers to know they are getting an older batch. It's all how you do your marketing from there.</p> <p>Thanks!</p>							

7/2/2020 23:02	<p>My big concern was over the test results that showed too much lead. Now you are saying retests contradict those initial results. The products should not be sold if not safe but if safe they should be released.</p> <p>Conditions: 1) Sample cartridges from each batch should be tested by each of the licensed testing labs. Any failed test should fail the product unless it is consistently one lab finding the negative result while the others pass the product. In that case, retest. 2) MTCs must label these cartridges as previously quarantined product in all published locations (in-house menus, websites, emails, Leafly, Weedmaps, Dutchie, etc. 3) They should be sold at a highly discounted price given they are old. ☐</p>	Eamon	McDaniel		Natick	MA	emcd8888@gmail.com	
7/3/2020 9:03	<p>When the ban went into affect I begin using streetVape. This resulted in three emergency department visits to MGH. It never was a problem with dispensary vape. This knee-jerk reaction by our government again with Poor results. I wish somebody could explain why the dispensaries closed during the virus but not liquor stores. Out of state residence is a cop out. It's easy to dispense to Massachusetts residence only.</p>	Bruce	Rumble		Beacon hill	Beacon Hill	rumble.bruce@yahoo.com	
7/3/2020 13:46	<p>The commission should evaluate how sound the science was that lead to the decision of pulling these products. Has anyone given thought to the fact that the lung problems attributed to these products may have been COVID-19 related and not the products?</p>							
7/3/2020 16:35	<p>Any product that was retested back in January following the Commission's initial guidance should be honored, and those products that passed testing should be put back onto the shelves. The Commission should consider giving 1-to-1 tax credits to operators who will potentially loose millions in wasted product as a direct result of the Commission's lack of initiative when it comes to making a decision on the 600,000+ units that could have and should have been put back into circulation at the beginning of the year.</p>							
7/3/2020 21:56	<p>You left this product sitting on the self and told us we couldn't destroy it. Now your asking what to do with it! This is crap 🤢</p>							

7/3/2020 22:20	<p>Vaping tinctures are only as good as the chemist who is cooking them. In order for these products to be safe, they need to be held to the highest standards of quality control.</p> <p>Under no circumstances should tincture products made in China be allowed for sale to the public. In fact, any product that is consumed internally should not be made in China as they have the lowest quality control standards.</p> <p>I am aware that many vape products sold on the market currently ARE made in China, or by domestic amateur producers who don't know what they are doing and these products are garbage.</p> <p>However, I am in favor of vape products being sold by professional manufacturers who do not cut corners or put their buyers at risk unnecessarily. If it is possible to confirm that a manufacturer is producing quality tincture without cutting corners in the process, then they should be allowed to sell the products.</p>	Ben			Boston	MA		
7/4/2020 9:17	Make the stuff (marijuana) cheaper for everyone especially seniors with chronic/terminal conditions.	glynn		patient 2nd class citizen (sr., blk, and po')	roxbury	ma	tariqwilliams@gmail.com	
7/4/2020 11:08	Can they be sold for research purposes? I read recently that the federal government will begin buying cannabis products from state retailers, where legal, for research purposes. What about universities and medical settings that are in state-legal Massachusetts? Could they purchase the old vapes for study? The questionable lead content (never mind any of the potential vitamin E acetate that was the initial concern) make the products unsafe for consumer sale, but surely there must be some sort of scientific use for the product.							
7/4/2020 13:04	Just do it for fucks sake and stop messing with the industry we voted for							

7/5/2020 16:24	<p>Because of the overreactive fear induced by the media, the politicians and the uneducated and biased academia sector of the overall state and national population - unwarranted actions and financial impact on the legal and legitimate marijuana product manufacturers and dispensaries has occurred. Based on this and the fact that new and additional testing requirements have also been inflicted on the legal industry within Massachusetts.</p> <p>Since the damage has already occurred, and I'm sure most of the manufacturers and dispensaries, my suggestion is to destroy all the products now under quarantine and start a new with a clean slate. With the recommendation that any future overreactive actions be limited and minimized by a gathering of facts and the solicitation of industry experts, not uneducated politicians and academia with the only interest in creating havoc and harm to an industry that solely just do not understand or represent!!!</p> <p>More time, effort and resources is much better spent and utilized policing and shutting down the illegal black market that runs rampant. The back market is the sole creator and cause of the legal industry problems...</p>				Cape Cod	Maasachusetts		
7/6/2020 9:02	<p>We need to know what the vape was cut with to make it vapeable. Whether it is safe or not should be the discretion of the consumer not the government official who has no clue and got their job since they knew somebody or more accurately blew somebody like in most cases. So you took them off the shelves where do you think people bought them from. Oh they just stopped. clueless.</p>							

7/6/2020 10:02

I apologize in advance if any of these have already been covered by the commission...

Firstly, I believe that the commission should allow the sale of vaporizer products, however, they should inform consumers of potential harm and provide information to them regarding studies and what has been learned regarding their effects. Even if these effects are harmful it should be up to the consumer to make an informed decision on whether or not they wish to then partake not up to the state to ban it. Thank you for effectively doing this by now allowing their sale again...

I recommend the following additions if they are not already part of the new order:

- 1) All products should contain a full list of their contents so that should future studies indicate harm arising from one of them the consumer can easily identify which products contain the ingredients in question and make their own decisions regarding it.
- 2) Add a warning label similar to regular smoking products.
- 3) TEST FOR PESTICIDES AND OTHER CONTAMINANTS. During extraction these can become heavily concentrated.
- 4) Develop a system for approving vendors of the actual cartridges. Require some type of testing of the cartridges to ensure they aren't leeching heavy metals or other contaminants prior to widespread use. If the vendor is not approved, have the labs perform random sampling to determine if the devices are safe.

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7/6/2020 15:26	<p>IDK but it's pretty embarrassing that Massachusetts can pull in *hundreds of millions of dollars* from the sale of Cannabis and somehow can't figure out a way to fund a sufficient way to do this.</p> <p>Where applicable, please get your shit together and do the job you're getting (over) paid to do. (And if you're doing this for free, you're still getting overpaid.)</p>				Salem	Massachusetts		
7/6/2020 20:15	<p>I do not endorse the use of vaporizers, quarantined or otherwise. The concentrate industry caused ordinary medical cannabis to be stripped of a large amount of its medical value. The stripped cannabis was then resold at full price. Besides, vapes are little more than solvent in an ignited inhaler.</p>	Casimer	Russak, III			Maine		
7/6/2020 20:29	<p>I was using carts that were purchased from a legal dispensary during this period. I had no adverse reactions. i must say though that there was carts available on the street that who knows what was in them. I think this was common knowledge.</p>	james			Franklin	MA	jdeda64@verizon.net	
7/6/2020 20:32	<p>I think they should be retested and sold.</p>							

7/7/2020 8:59	<p>They should not allow this oil to be sold. This oil is so old now that it will all have to be remediated. And until the commission makes regulations that ensure that All cannabis processors remediate the ENTIRE batch rather than just the small sample sent to the lab, the commission should hold all sales of all cannabis products. This needs to also apply to any and all cannabis flower, kief, edibles and other concentrates that have failed initial testing.</p> <p>Please look into this!!!</p>	Anonymous		Former Director to cannabis facility		Massachusetts		
7/7/2020 11:18	<p>As long as the products are tested for full screens as per the regulations (along with several passing heavy metals retests), then the products should be available for sale with a disclaimer that these are from the previously quarantined batches.</p>							
7/7/2020 11:39	<p>All the oil should be reclaimed and retested. No prefilled vapes should be sold as operators could sneak in a clean vape and sell a tainted batch.</p> <p>The product should have to be physically be reclaimed, per batch, and then retested.</p>	Scott	Murphy	Director of Compliance / Operations	Maynard	Massachusetts	murphy9682@gmail.com	

7/7/2020 14:26	<p>CommCan will remove, reprocess and retest the cannabis oil ("Oil") in the now quarantined vaporizer cartridges ("Carts"). This process will consist of de-capping the Carts and soaking them in ethanol. Once the ethanol has dissolved the Oil, the Oil will be processed with a rotary evaporator to remove the ethanol. The Oil will then be processed through molecular distillation to remediate any potential contaminants. The Oil will then be submitted to an approved Massachusetts cannabis testing laboratory in compliance with all applicable testing requirements.</p> <p>REMOVE, REPROCESS, RETEST!</p> <p>These processing procedures are the same procedures we currently follow to create our distillate. The process of molecular distillation removes all impurities resulting in an Oil consisting of only cannabinoids. The testing requirements currently in effect will ensure that the Oil complies with all CCC regulations.</p>	Ellen	Rosenfeld	President, CommCan, Inc.	Millis	MA	ellen@rosenfeld-law.com	5082942002
7/7/2020 21:23	<p>Allow testing by batch. If batch passes, release for sale. Do multiple tests within a batch. At least double the sampling frequency that produced results of disparate findings.</p> <p>If a licensee can't produce source of batch inconsistency then they should be on probation of increased testing until their manufacturing procedures produce reliable test results for a batch. Reliable enough to return to the current testing frequency/rate.</p> <p>Overall there seems to be an issue with regulation of this type of product that is allowing bad product get to customers. It could be the lack of Good Manufacturing Practices (GMP). I would say there is potential for pop inspections/batch sample testing of a licensee to randomly double check the effectiveness of their procedures. This random test would go beyond testing the final product if an issue is found, a more thorough testing of the grow to manufacturing process to reveal root cause.</p>							
7/8/2020 10:41	<p>The Commission should allow the resale of these items as long as a full disclosure is provided by the manufacturer with accurate and current testing within the past 90 days before hitting the shelves. These products are still being created with the same manufacturing hardware and ingredients, just newer batches. All of the older product in quarantine will go to waste- upwards in the millions of dollars in product will have to be properly disposed of- and since the industry is not allowed to claim any losses federally as well. This cost of disposal and waste will trickle down to the consumer making medicine even more costly within the Commonwealth when prices are already out of control.</p>	Elizabeth	Palmer	Medical Patient, Dispensary Agent, Advocate	Sturbridge	Ma	lizzbeth007@gmail.com	5083300280

7/9/2020 18:18	The Commission should allow the immediate sale of these products under the condition that dispensaries provide notice that these items were contained in quarantine. Dispensaries should be required to disclose this information prior to sale, and should include written notice of inconsistent test results with the product packaging.							
7/11/2020 19:30	<p>Response to the request for public opinion on the sale of vape cartridges. In my very humble opinion, the sale of quarantined vape cartridges should be a decision based in scientific evidence and quality testing. To protect consumers, testing should be implemented to verify that vapes manufactured within the quarantine period are safe for sale. Testing the batch should occur under the supervision of the commission or a third party.</p> <p>Please note the following outline is an over simplified suggestion on data that may be collected to determine the safety of the vape cartridges in question.</p> <p>Method</p> <ol style="list-style-type: none"> 1.All samples for vape cartridges in question should be chosen by third party random sampling. *All samples should be collected randomly by a third party in routine practice. 2.Send the samples to the lab with random label. A third party or the commission should randomly assign a number to each of the vape cartridges collected and sent to the testing laboratory as a blind sample. <p>Data to Be collected</p> <ol style="list-style-type: none"> 1.Date the product was manufactured. 2.Date the product was packaged. 3.Ambient temperature and humidity of the environment that the sample was stored. 4.Quality Testing <ol style="list-style-type: none"> a.Pesticides b.Heavy Metals c.Lead d.Vitamin E Acetate e.Water content 	Ashley	Boucher					
7/13/2020 14:55	Vaping is vital to those who have no other option because of issues with housing. During this time that the vaping was shut down - I had a terrible time administering my MMJ since I live in an apartment with smoking restrictions and edibles only worked on certain aspects of my issues.	Nicole	Desjardins	Owner	Easthampton	Ma	nicole@flock.consulting	4132123000

7/13/2020 17:46	<p>Dear Cannabis Control Commission,</p> <p>I recently learned you placed various cannabis products in quarantine. My first thought was in 2008 MIT reported Marijuana had been shown to kill MSRA, so I doubt the Corona virus is any match either.</p> <p>However after reading this [https://cannabiscontrol.formstack.com/forms/question_for_public_comment] it's clear your quarantine is not about viruses, but lead. Or rather a mishmash of sincere sounding concerns and standard prohibitionist doublespeak.</p> <p>I urge you to remove those restrictions and allow for their immediate sale.</p> <p>You ask "Under what conditions should the Commission allow the sale of vaporizer products?" and "please provide a rationale for or evidence of your position."</p> <p>Here is the condition, the rationale should be obvious to 90+ percent of the population.</p> <p>1a) Producers of the product should also be consuming part of it themselves. (What sense does it make for people who produce something be mere overseers, or even worse, people who denigrate their product and/or those who consume it? Do you want devil-worshippers dictating rules to your church?)</p> <p>1b) Producers and vendors of accessories and devices should also demonstrate use and proper use.</p> <p>Keep It Simple.</p>	Andrew	Bairnsfather	Christians Against Prohibition		MA		
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7/14/2020 10:39	<p>Should the CCC make a determination to release vaporizer products manufactured before December 12, 2019, the Cannabis Control Commission should utilize a secure retail mark on any released units. A secure stamp on released vaporized products would provide the legal-age consumer public an opportunity to educate themselves on the safety and efficacy of these products through consumer engagement functions and would enable to the CCC to better track and ensure these products do no greater harm to the public, should they be authorized for release</p> <p>A secure, counterfeit-resistant stamp would be assigned to the unique retail unit and would provide both the CCC and consumers with the following benefits:</p> <p>1) A visible demonstration of authenticity, proof that the product is sourced from a legitimate, licensed manufacturer</p> <p>2) A consumer engagement data matrix to enable purchasers to use a mobile phone to view updated safety testing done on the quarantined product and dynamically warn consumers not to purchase should the CCC make a post-release determination that these products are not in accordance with the Commission's Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products.</p> <p>3) A means for the CCC to specifically track the distribution and sale of these products and ensure products are not sold for human consumption should they later prove to have adverse impacts on public health</p> <p>4) A means for the CCC to ensure that the quarantine release program is not used by operators to release other products under separate quarantine or products that have not been approved for general distribution and sale.</p>	Alexander	Spelman	VP - Business Development, SICPA Product Security	Springfield, VA	VA	alex.spelman@sicpa.com	9177838506
7/14/2020 12:38	All products must be tested for heavy metals. It is well known that many of the vape cartridges contain hardware that is known for leeching heavy metals. The carts have now been sitting on shelves for 9 months, potentially leeching heavy metals.	Alexandra	Gomes		Milford	MA	alexmgomes93@gmail.com	5087829772

7/14/2020 13:03	Destroy all those old products ,possibly contaminated, passed through many hands and environments definitely not sterile . old ,old,and old ! The patients of this great state should not have to purchase old medicine. Cartridges that fail 25% of the time in normal conditions.after months in storage will most likely result in at least 50% of the devices defective. Defective cartridges may over heat and cause the patients to inhale toxic metals.mold is another issue. It is not worth the health of the patients to allow millionaires to sell us poison.	Jason	DeCecca			Massachusetts	dececcaj@gmail.com	
7/14/2020 17:12	As a product manufacturer, we would love the opportunity to extract the materials out of the old cartridges, re-run the material through our extraction system, put them into brand new cartridge hardware, and have them completely re-tested. We believe this to be an effective way to save the material and have the vaporizer products re-extracted and fully tested. If there is no way the Commission feels comfortable allowing the sale of these old vaporizers, we would encourage the Commission to issue a destroy order, so we can properly rectify the financials of the product lost due to this ban, and gain back the space in our vaults that has been occupied by these cartridges for almost a year.	Kasey	Corson	Compliance Director, Temescal Wellness		MA	kasey@temescalwellness.com	6034911975
7/14/2020 18:22	I do not use any vapor products. Not familiar with the product so cannot comment on it							
7/14/2020 18:31	if their not pure it should throw away its made with anything other then Co2 or alcohol , if should be thrown away	Steven	Drury	MassVocals	Templeton	massachusetts	massvocals@comcast.net	9786525959

7/14/2020 18:34	<p>Based on your own (Commission) statements, I do not want the suspected contaminated items re-sold. All suspect material should be destroyed. Future vaporizer products should pass all tests with the highest possible safety and health considerations enforced.</p>	Mike			Westport	MA		
7/14/2020 18:34	<p>Vaporizer products should not be allowed to sit on the shelf for 3+ months after testing for lead and heavy metals.</p> <p>These products are often rushed through the testing phase a few days/weeks after filling, and their reported lead and heavy metal content is low. After they sit on the shelf for months after testing, their lead content increases due to heavy metals leeching into the concentrate.</p> <p>To get to the root of this problem, *producers should be prohibited from using cartridges that have any lead content.*</p> <p>No lead. Stricter testing timelines.</p>	Nicole	Erickson		Boston	MA		
7/14/2020 18:42	<p>Vaporized products should be treated as a specialty item with a tad more over site they have more then one moving part, improving the products safety is key</p>	Donald j	Roche jr		Quincy	Mass	drtaxi2004@yahoo.com	
7/14/2020 18:42	<p>over age 25. this would allow a much smaller amount being utilized for medicinal use and make cannabis more cost effective , I have personal experience moving from another state last year here, which allows vaporizer use</p>				Plainville,	MA 02762		

7/14/2020 19:00	I feel that if these quarantined products are still within a time frame to be sold, ie: use by date. then these products should be returned to original stores, if still open, and sold in Smoke Shops that only will sell to adults 21 and over and check the id. I think as an adult, we make decisions about what we put in our bodies everyday, and it should be our choice, not the State/Government.	Jennifer	Nelson		Winchendon	MA	jenbnelson@comcast.net	
7/14/2020 19:00	I suggest having the hardware for the different cartridges evaluated by DPH for risk. I would use the DPH's assessment to dictate required testing. The DPH could consult with externally hired consultants to help inform their risk assessment. I would also recommend the DPH determine a scientifically based sampling approach that is appropriate to capture representative samples.	Scott	Churchill	Director of Scientific Operations MCR Labs	Framingham	MA	scottc@mcrlabs.com	5084090472
7/14/2020 19:04	Under no conditions should these products be sold. At this point of degradation, with the lab tests showing signs of lead, we implore you to destroy them all. Anything sold would be considered unsafe especially to patients who can have multi systemic issues and are vulnerable. With covid the last thing we also need is extra people requiring medical care on an already taxed system. Please consider other methods for the future so we do not have this issue again. I myself tested a few older cartridges and found them positive of lead, including ones bought legally. This is an issue we brought to the commission in 2018.	Michelle	Herman	Lobbyist/ Media Director at MassSense	Needham	Ma		

7/14/2020 19:17	<p>Considering that the danger to public health came from black market products, and not those produced by the legal cannabis system I don't see any additional conditions required to sell the vapor products in question. The cutting agent vitamin e acetate was never a problem within the legal vapor product sector but rather a product used in the black market where no lab tests showing ratios are used in order to bolster volume and increase their profits.</p> <p>The legal cannabis community and vape community in general should not be punished financially due to the shady tactics of black market dealers.</p> <p>The testing requirements and control standards already in place are adequate and no further burdens need to be added.</p>	Lemuel	Gomez		Lancaster	Massachusetts	lemuel.i.gomez@gmail.com	7578020111
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7/14/2020 19:27	<p>Dear Mr. Collins,</p> <p>On behalf of PAX Labs, a leader in premium cannabis vaporizer technology, we are reaching out to respectfully request the release of all PAX Era Pods from quarantine. Era Pods work exclusively with our closed-system PAX® Era and PAX® Era Pro devices, are not refillable, and are filled and sold in Massachusetts by our brand partners Liberty, In Good Health, Rythm, Sira Naturals, The Green Lady, and CommCann.</p> <p>At PAX, we believe that strong, data-driven policy is key to improving public health. We recognize the challenges that the Commission has faced as a result of the 2019 EVALI outbreak, the cause of which was determined by the CDC to be the addition of Vitamin E Acetate to illicit market products. No confirmed case in Massachusetts was identified as the result of a product purchased from a licensed cannabis establishment in the state.</p> <p>However, we are soon approaching a point in time where the products currently in quarantine, which have been in quarantine since the Executive Order was first issued on September 24, 2019, will no longer be salable under Massachusetts regulations, as they will have reached their expiration dates. This will result in millions of dollars of economic harm to an industry that is in its infancy, and has faced myriad operational and financial challenges as the result of the Governor's vape ban, COVID-19 related closures and lack of access to stimulus relief.</p> <p>We share your commitment to and prioritization of consumer safety. In fact, PAX pods are designed with this intent and undergo rigorous testing to ensure high</p>	Sally	Brammell	Head of Legal, PAX Labs			sally@pax.com	
7/14/2020 19:36	If the vaporizer products don't contain vitamin E oil or lead or harmful chemicals or compounds then they should be sold. Re-test a sample of each batch	Michael	Lavery	Selectman	Becket	Massachusetts	linuxkungfu@gmail.com	4132120528
7/14/2020 19:40	Retest and sell.	Brian	Federico	Lab Technician	East wareham	Ma	bfederico88@gmail.com	5082097231

7/14/2020 19:41	<p>Under no conditions should vapes be allowed to enter the market again. They pose a risk to public health with or without acetate and are currently the subject of class action lawsuits across the country. One-sixth of patients who developed lung injuries after vaping marijuana obtained the product from legal dispensaries resulting in over 2800 hospitalizations or deaths across America. Furthermore, the University of Oregon published its findings on marijuana vapes showing they produce carcinogenic compounds when heated. From the article: "Samples of lab-created e-liquids and "dabs" -- waxy pot concentrates -- produced a variety of toxic chemicals when they were heated. Those chemicals included benzene, a known carcinogen, and an air pollutant called methacrolein. Others included xylenes, toluene, styrene and ethylbenzene." (Source: https://www.upi.com/Health_News/2019/12/10/Terpenes-in-marijuana-vaping-products-may-produce-toxic-chemicals/6861575932260/)</p> <p>The CDC and FDA recommend that people not use THC-containing e-cigarette, or vaping, products, particularly from informal sources like friends, family, or in-person or online dealers. Since the Commission cannot guarantee diversion into these distribution channels, and due to the impact on overall public health, I am against the sale and redistribution of marijuana vapes, especially in this an era of COVID 19 here in the state and across the country.</p> <p>End of commentary.</p> <p>Other sources used:</p> <p>CDC - (https://www.cdc.gov/tobacco/basic_information/e-cigarettes/severe-lung-</p>	Tom	Vega	Father and Commonwealth Public Health Advocate	South Deerfield	MA	t.vega@comcast.net	4132108481
7/14/2020 20:21	As a consumer, I am hoping to purchase the safest product possible. To that end, I would say that only those that are each fully tested should be put back to market.	Michael	Accatdi		Melrose	MA		

7/14/2020 20:30	As a user of vaporizer type products and a former user of cigarettes/tobacco ,I can attest to its efficacy in eliminating cigarette usage. it has enabled me to eliminate nicotine usage , and the vaping oils i now use are strictly clove flavored. I am also the holder of a Massachusetts Medical Marijuana Card. I use cannabis in liquid form with a vape device as sleep aid and to help with spasmodic dysphonia symptoms. Eliminating the availability of these products would hamper my and others efforts to lead a more productive lift. Thank You. in closing, i would be interested an willing to serve on this Cannabis Control Commission	kathy	wallace		fitchburg,m a		auditt1@verizon.net	9785024439
7/14/2020 21:04	Do not allow vaporizer products to be sold in Massachusetts.							
7/14/2020 23:58	Did you identify mineral oil or unknown hydrocarbons in any of the tested cartridges? These ingredients are clinically acknowledged to cause lipoid pneumonia. True Terpenes Viscosity was rumored to be made of mineral oil/squalene and many MA licensed dispensaries list this brand on their contents. They withdrew their original formula and put out a new version in September that did not contain these things anymore but dispensaries would have been using this prior to the inventory quarantine.							
7/15/2020 0:00	How many PPM of lead was found in cartridges and what brands failed on the retested cartridges? What was the highest level of heavy metals detected? What brand of empty vape cartridges had issues with leaching heavy metals? S patients can know to avoid dispensary products using those types of cartridges.							

7/15/2020 0:01	Was Vitamin A (not E) in the list of analytes that you tested for? This was identified in a New York licensee medical dispensary over the winter.							
7/15/2020 0:02	What was the highest percentage of terpenes found in a retested cartridge? Were any markers of synthetically derived terpenes tested for or identified? What brand(s) contained synthetic terpenes/flavorings?							
7/15/2020 0:04	Were cartridges tested for "CRC" filter media? Powders like diatomaceous earth are used for cartridge remediation chromatography which can expose the end user to inhalation of unsafe minerals if they are passed through the filter paper.							
7/15/2020 0:05	What (if any) brands advertised higher THC content than the amount of THC detected in the retested oil samples?							
7/15/2020 0:09	They are still being sold "under the counter" all over the State of Mass. No increases in deaths since the ban ? I believe if you are of legal age to drink and smoke cigarettes, vaping should be allowed in all SAFE TESTED FORMS..						wbeers2005@gmail.com	7742170011

7/15/2020 0:25	You can do one of two things I believe. You can either require a completely different casing for the cartridges (one without lead) or secondly, set a test for levels of lead, allow the cartridges to be retested. If they pass then they should be released to the public. If they fail, they should not be given an opportunity to remediate the product and should be forced to properly dispose of the product.							
7/15/2020 6:08	<p>Anything quarantined that long is going to have metals leached into the product. From experience under lab testing with The Harvest Cup, an annual cannabis competition at the Worcester DCU Center. We have a category for vapes. They all failed for metals in lab testing at MCR Labs.</p> <p>Vape coils made of ceramic are available on the market. They are three times as expensive, which is why companies don't use them. Mandate non-metal heating elements and packaging. Metals will inevitably leech into vape fluid products.</p>	Peter	Bernard	Executive Director at MassSense/ MGAC	Taunton	MA	Peter@massgrower.org	7743226045
7/15/2020 6:32	The vaporizer products under discussion should remain unavailable for sale. They shall remain in quarantine for future references							

7/15/2020 7:52	<p>The units should not be allowed for resale. There are many unknowns and virtually no tests showing the effects of long term shelf seating of cannabis vape material along with their potential excipients and blended components. Simply testing for heavy metals and/or some known contaminants should not justify the release of products that have been sitting for nearly 11 months and in some cases longer. Current testing is TARGETED. Targeted testing only looks for specific elements. These long shelved products may contain unknown risk elements that are incredibly difficult to detect without a long series of exhaustive testing showing reason for additional targeted tests. Further, since the vape crisis, parties participating in the cannabis vape sector have revised their product specifications. Oil producers have revised formulations. Hardware manufacturers have revised components and SOPs for labs. Should we really consider allowing re-entry of potentially high risk product back into the public? It seems illogical and reckless to put public health at risk for financial benefit.</p>				Boston	MA		
7/15/2020 8:57	<p>Vape carts should be retested and if they meet state testing requirements, they should be sold at a heavily discounted rate.</p>							

7/15/2020 9:10	<p>Dear Commissioners,</p> <p>The currently posed question of when or whether the embargoed oil cartridges can be released for sale has at least two separate issues embedded. First is the question of the safety of these particular cartridges, and the second is the safety of any such cartridges that use current technology. Both of these questions would reasonably need to be affirmed prior to sales.</p> <p>With regard to the safety of the currently embargoed products, we believe that current testing methods could reasonably be employed to ascertain the contents of the cartridges. It does remain unclear what agent(s) were responsible for EVALI, but the likely culprit, Vitamin E acetate, can be detected. Along with other regulatorily mandated testing, this would likely assure the safety of these particular products.</p> <p>However, the larger question of the safety of these devices as a class remains. There is ample evidence that these devices, while popular, are NOT, in fact, safe. The issue is not simply what is in the cartridge, but also how the device, itself, works. These devices are simple and do not adequately, if at all, regulate the temperature that is applied to the contents of the cartridge. Even devices, like the PAX ERA, which purport to set the temperature do not measure the temperature, but rather simply estimate it.</p> <p>Devices that do not adequately control temperature are not truly vaporizers, they are combustors. They produce a range of toxins and carcinogens that should be avoided for health reasons. These include Benzene, Acrolein, and Methacrolein which are</p>	Jordan	Tishler	President, Association of Cannabis Specialists	Brookline	MA		
7/15/2020 9:11	<p>Every batch needs to be retested for any contaminants and if they pass then that batch can be sold. If the batch fails, then the batch can be remediated to remove any contaminants that may be present.</p>	Brian	Adams		Hudson	Massachusetts	brian.adams@hbprocessing.com	5086583573
7/15/2020 9:50	<p>I feel that if the quarantined products are adequately tested and meet current safety standards, they should be immediately made available for sale so as to not provide an additional loss of revenue based on a misguided overreaction by the Governor.</p> <p>It was fairly clear from the onset of the "vape epidemic" that the vast majority of cases were from cheaply made, unregulated, black market products and the regulated market was scapegoated by people that didn't have any real interest in the real root cause of the problem but saw it as an opportunity to restrict the regulated</p>	DAVID	MONTE		Sutton	MA	davidmonte12@gmail.com	8022382591

7/15/2020 12:00	<p>Value-Added Testing Leadership</p> <p>It is our belief that the Commonwealth of Massachusetts is serving America at large as a leader in Cannabis and Hemp governance, risk and compliance best practices and processes. We feel that it is in the state's best interests that we lead the nation in a well thought out strategy for helping our licensees with the Six Sigma testing and approval strategy that crosses all core products and processes relating to quarantine products.</p> <p>Based on this vision, we recommend that a report be compiled to lay out the state's position and the math foundation that our policies are based on to ensure that all value chain processes relating to testing are fair, accurate and backed by the education needed at the consumer and other levels of B2B and B2C commerce.</p> <p>Our organization Cannabis Connect / CHchains.org is focused on the standards that promote health and safety across the entire value chain of the Cannabis and Hemp industries.</p> <p>Thank you for your continued leadership and innovative approaches to health and safety testing!</p> <p>Phil Wilson</p>	Phil	Wilson	Founder and Managing Director	Harvard	Massachusetts	chvaluechains@gmail.com	
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7/15/2020 12:17	<p>CONTAMINATED QUARANTINED VAPES SHOULD BE DESTROYED, NOT RETURNED TO THE RETAIL MARKET. Under no conditions should the CCC allow the sale of vaporizer products that were prohibited for sale or subjected to quarantine, during the identified time period. Allowing the sale of these products puts consumer health and safety at risk, with legal responsibility sitting with the CCC and the State. The product testing has shown that contaminant content in the products is inconsistent at best. The longer these products sit, the greater the chance more heavy metals from cartridges will be leaching into oils. The health risks are myriad and safety cannot be assured. This is consistent with whistle-blower reports that people have experienced "heavy metal poisoning" as a result of using the legal product they sold in Massachusetts.</p> <p>Additionally, products which have tested positive for mold and illegal pesticides have been ordered to be destroyed. The same should be ordered for these unsafe products which jeopardize consumer health and safety. Reports indicate that some products tested contained high levels of lead and CCC Executive Director Shawn Collins has reportedly said that if consumers had vaping products that they purchased prior to the ban, they may contain lead. The CCC has reported that only a "representative sample" of these quarantined vapes have been tested, and that they have not been tested for all possible contaminants. These findings are consistent with study reports in the scientific literature. For example, based on results from one study (Lead and Other Toxic Metals Found in E-Cigarette 'Vapors': POTENTIALLY DANGEROUS LEVELS OF METALS LEAK FROM SOME E-CIGARETTE HEATING COILS; Hess et al, 2017 and Johns Hopkins Bloomberg School of Public Health News Release, 2018), the authors reported "... It's important for the FDA, the e-cigarette companies and vapers themselves to know that these</p>	Amy	Turncliff	Neuroscientist and Public Health Advocate		MA	Amy.Turncliff@RockFernScientific.com	
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7/15/2020 12:28	<p>My position is to allow the sales. I have evidence that I will not share, but products that are not allowed for safe sales, can be purchased underground. A person does not know if what they are buying is safe. The purchase I think is made because the character of the product is soft and inhales easily, unlike rolled cannabis leaf, which has a bit of harshness to it. Some greatly appreciate the new vaping products.</p> <p>I have a lived experience. I am a 74 year old divorced woman who maintains a part time responsible career, is helping to renovate a house I purchased for a rental, takes care of her own 2000 sq.ft home and flower gardens galore by myself. I am a nurse with 2 master's degrees.</p> <p>If the evidence shows a high quality product, put it back in the stores.</p>	Kathleen	Panagiotes	MA, MSN, RN	ASHBY	MA	kpanagiotes@comcast.net	
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7/15/2020 12:59	<p>Governor Charles D. Baker,</p> <p>As an ISO-17025 accredited cannabis and hemp testing lab and current California market share leader, CannaSafe is dedicated to the safety of patients and recreational consumers.</p> <p>In the Fall of 2019, we spearheaded the investigation into the 'Vape Crises' by publicly providing essential data from the testing of illicit vape cartridges. We were able to determine Vitamin E acetate was the common adulterant in illicit vape carts, but not present in the legal market. NBC broke the story nationally about a month before the CDC was able to confirm. This is because we have much greater access to products than the federal government and have been doing profile testing on cannabis since 2011.</p> <p>In addition, we tested the vapor produced by illicit vape cartridges and found that Vitamin E & heavy metals in the oil in the oil are inhaled by the consumer. The various pesticides found in illicit cartridges combusted into Harmful and Potentially Harmful Constituents (HPHCs - all found in tobacco products). These dangerous contaminants were not found in the oil or vapor of the legal vape cartridges. Finally, we saw that temperature played a large role in what was produced in the vapor. The higher the temperature, the more product breakdown and dangerous chemicals produced. These results are a testament to the current California cannabis testing regulations which we feel patients and consumers of Massachusetts would benefit from. California Phase III testing regulations include the testing of the following for all cannabis concentrate/vape products: potency, pesticides, microbials, foreign matter, mycotoxins, heavy metals, and residual solvents.</p>	Antonio	Frazier	President	Los Angeles	CA	antoniof@csalabs.com	
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7/15/2020 13:16	<p>Governor Charles D. Baker,</p> <p>As an ISO-17025 accredited cannabis and hemp testing lab and current California market share leader, CannaSafe is dedicated to the safety of patients and recreational consumers.</p> <p>In the Fall of 2019, we spearheaded the investigation into the 'Vape Crises' by publicly providing essential data from the testing of illicit vape cartridges. We were able to determine Vitamin E acetate was the common adulterant in illicit vape carts, but not present in the legal market. NBC broke the story nationally about a month before the CDC was able to confirm. This is because we have much greater access to products than the federal government and have been doing profile testing on cannabis since 2011.</p> <p>In addition, we tested the vapor produced by illicit vape cartridges and found that Vitamin E & heavy metals in the oil are inhaled by the consumer. The various pesticides found in illicit cartridges combusted into Harmful and Potentially Harmful Constituents (HPHCs - all found in tobacco products). These dangerous contaminants were not found in the oil or vapor of the legal vape cartridges. Finally, we saw that temperature played a large role in what was produced in the vapor. The higher the temperature, the more product breakdown and dangerous chemicals produced. These results are a testament to the current California cannabis testing regulations which we feel patients and consumers of Massachusetts would benefit from. California Phase III testing regulations include the testing of the following for</p>	Antonio	Frazier	President	Van Nuys	California	antoinof@csalabs.com	
7/15/2020 13:28	<p>The state of Massachusetts should have analyzed the whole situation better. The vast majority of people who were adversely affected by vaping products were from Wisconsin, and the vaping products were not regulated, (ie..obtained from the black market). Our Cannabis Commission has put together a very stringent series of regulations, and is the strictest in the nation. The MA cannabis industry, and cannabis products are already safer than in any other state. There is no need to continue the ban on vaporizer products. Many medical patients, and recreational consumers are being denied this safe form of consumption, and are having to inhale smoke which is definitely more unhealthy than vaping. (More importantly, people are still finding ways to get vaporizing products! Everyone who wants it can still get it on the black market, which is not regulated and was the cause of the all the problems in the first place.)</p> <p>The only thing the state needs to do is to ensure all licensed manufactures that are</p>	Jason	Backman	Vice President Alfred's Finest	Plymouth	MA	jason.backman@alfredsfinest.com	

7/15/2020 14:02	<p>CONTAMINATED QUARANTINED VAPES SHOULD BE DESTROYED, NOT RETURNED TO THE RETAIL MARKET. Under no conditions should the CCC allow the sale of vaporizer products that were prohibited for sale or subjected to quarantine, during the identified time period. Allowing the sale of these products puts consumer health and safety at risk, with legal responsibility sitting with the CCC and the State. The product testing has shown that contaminant content in the products is inconsistent at best.</p> <p>The longer these products sit, the greater the chance more heavy metals from cartridges will be leaching into oils. The health risks are myriad and safety cannot be assured. This is consistent with whistleblower reports that they have experienced "heavy metal poisoning" as a result of using the legal product they sold in Massachusetts.</p> <p>Additionally, products which have tested positive for mold and illegal pesticides have been ordered to be destroyed. The same should be ordered for these unsafe products which jeopardize consumer health and safety.</p> <p>Reports indicate that some products tested contained high levels of lead and CCC Executive Director Shawn Collins has reportedly said that if consumers had vaping products that they purchased prior to the ban, they may contain lead.</p> <p>The CCC has reported that only a "representative sample" of these quarantined vapes have been tested, and that they have not been tested for all possible contaminants. These findings are consistent with study reports in the scientific literature.</p>	Ornella	Quinn	Advocate - Massachusetts Addiction Prevention Alliance-	Berlin	Massachusetts	ornellaq@yahoo.com	9788380141
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7/15/2020 14:30	<p>The vapes that have been contaminated and quarantined should be destroyed and under no circumstances be returned to the market.</p> <p>Allowing the sale of these products puts consumer health and safety at risk, with legal responsibility sitting with the CCC and the State.</p> <p>The product testing has shown that contaminant content in the products is inconsistent at best. The longer these products sit, the greater the chance more heavy metals from cartridges will be leaching into oils. The health risks are myriad and safety cannot be assured. This is consistent with whistle blower reports that they have experienced "heavy metal poisoning" as a result of using the legal product they sold in Massachusetts.</p> <p>Reports indicate that some products tested contained high levels of lead and CCC Executive Director Shawn Collins has reportedly said that if consumers had vaping products that they purchased prior to the ban, they may contain lead.</p> <p>The CCC has reported that only a "representative sample" of these quarantined vapes have been tested, and that they have not been tested for all possible contaminants. These findings are consistent with study reports in the scientific literature.</p> <p>For example, based on results from one study (Lead and Other Toxic Metals Found in E-Cigarette 'Vapors': POTENTIALLY DANGEROUS LEVELS OF METALS LEAK FROM SOME E-CIGARETTE HEATING COILS; Hess et al, 2017 and Johns Hopkins Bloomberg School of Public Health News Release, 2018), the</p>	Lisa	Mair		Berlin	MA	lisamair31@yahoo.com	9788389465
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7/15/2020 14:31	<p>CONTAMINATED QUARANTINED VAPES SHOULD BE DESTROYED, NOT RETURNED TO THE RETAIL MARKET. Under no conditions should the CCC allow the sale of vaporizer products that were prohibited for sale or subjected to quarantine, during the identified time period. Allowing the sale of these products puts consumer health and safety at risk, with legal responsibility sitting with the CCC and the State. The product testing has shown that contaminant content in the products is inconsistent at best. The longer these products sit, the greater the chance more heavy metals from cartridges will be leaching into oils. The health risks are myriad and safety cannot be assured. This is consistent with whistleblower reports that they have experienced "heavy metal poisoning" as a result of using the legal product they sold in Massachusetts.</p> <p>Additionally, products which have tested positive for mold and illegal pesticides have been ordered to be destroyed. The same should be ordered for these unsafe products which jeopardize consumer health and safety.</p> <p>Reports indicate that some products tested contained high levels of lead and CCC Executive Director Shawn Collins has reportedly said that if consumers had vaping products that they purchased prior to the ban, they may contain lead.</p> <p>The CCC has reported that only a "representative sample" of these quarantined vapes have been tested, and that they have not been tested for all possible contaminants. These findings are consistent with study reports in the scientific literature.</p> <p>For example, based on results from one study (Lead and Other Toxic Metals Found in E-Cigarette 'Vapors': POTENTIALLY DANGEROUS LEVELS OF METALS LEAK FROM SOME E-CIGARETTE HEATING COILS; Hess et al, 2017 and Johns Hopkins Bloomberg School of Public Health News Release, 2018), the</p>	Patricia	McCord		Berlin	MA	patriciamccord@gmail.com	9788382422
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7/15/2020 15:04	<p>CONTAMINATED QUARANTINED VAPES SHOULD BE DESTROYED, NOT RETURNED TO THE RETAIL MARKET. Under no conditions should the CCC allow the sale of vaporizer products that were prohibited for sale or subjected to quarantine, during the identified time period. Allowing the sale of these products puts consumer health and safety at risk, with legal responsibility sitting with the CCC and the State. The product testing has shown that contaminant content in the products is inconsistent at best. The longer these products sit, the greater the chance more heavy metals from cartridges will be leaching into oils. The health risks are myriad and safety cannot be assured. This is consistent with whistleblower reports that they have experienced "heavy metal poisoning" as a result of using the legal product they sold in Massachusetts.</p> <p>Additionally, products which have tested positive for mold and illegal pesticides have been ordered to be destroyed. The same should be ordered for these unsafe products which jeopardize consumer health and safety. Reports indicate that some products tested contained high levels of lead and CCC Executive Director Shawn Collins has reportedly said that if consumers had vaping products that they purchased prior to the ban, they may contain lead. The CCC has reported that only a "representative sample" of these quarantined vapes have been tested, and that they have not been tested for all possible contaminants. These findings are consistent with study reports in the scientific literature. For example, based on results from one study (Lead and Other Toxic Metals Found in E-Cigarette 'Vapors': POTENTIALLY DANGEROUS LEVELS OF METALS LEAK FROM SOME E-CIGARETTE HEATING COILS; Hess et al, 2017 and Johns Hopkins Bloomberg School of Public Health News Release, 2018), the authors reported "... It's important for the FDA, the e-cigarette companies and vapers themselves to know that these</p>	Wendy	Rogalinski	Director of Marketing and Communications	BERLIN	MA	Wrogalinski@gmail.com	
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7/15/2020 15:07	<p>On behalf of the Getting it Right from the Start: Regulation of Recreational Marijuana, we thank the Commission for the opportunity to provide this input. We are writing in opposition to allowing the sale of any vaporizer products that were prohibited for sale or subjected to quarantine between September 25, 2019 and December 12, 2019, or of other vaporized products at this time. During the ongoing Covid-19 pandemic and accompanying public health crisis, it is irresponsible to release products, from a family of products whose use has been known to cause serious lung injury, primarily acute respiratory distress syndrome, as well as what is likely to be other less grave injury, and whose safety for inhalation has in no way been tested or evaluated other than the presence of certain contaminants.</p> <p>Getting it Right from the Start is a project of the Public Health Institute, a California-based nonprofit organization with 55-years of experience working across the globe to promote health, well-being and quality of life for all people. For decades, PHI programs, have worked to protect and promote the health and wellness of children, adolescents and adults. Getting it Right from the Start works to collaboratively develop and test models of optimal marijuana policy with the goal of reducing harms, problem use and youth use and promoting social equity. We seek to ensure that the negative public health impacts caused by big tobacco and alcohol are not repeated in the cannabis industry, in particular developing new and diverse products that are known to attract youth to use.</p> <p>We recommend that the commission maintain a complete ban on vaporizer products until such time as the cannabis industry provides robust scientific evidence that they are safer than smoking traditional flower in terms of pulmonary risks, addiction, and</p>	Amanda	Naprawa	Public Health Attorney			amanda.naprawa@phi.org	6149052543
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7/15/2020 16:15	<p>Sale of quarantined vaporizer products should be allowed so long as all sellers clearly label such vaporizer products as members of the group of vaporizer products originally prohibited by executive order and subject to quarantine order by CCC. Information relative to testing results of such quarantined products should be made available to all buyers of such products so they can decide if the risk is, in their opinion, acceptable. This will allow dispensary patrons to decide whether to purchase a previously quarantined product or a product that was manufactured after the prohibition.</p> <p>Also, from an economic perspective, this will allow marijuana facilities to recoup costs relative to such products but due to my proposed Notice provisions, the economic benefit to marijuana establishments will be balanced against Notice to consumers allowing them to decide if they rather buy such products or instead, substitute products.</p>	Christopher	Ryan		Bellingham	MA	christopherryan@mailworks.org	5084007629
7/15/2020 16:20	<p>These units should be destroyed. There can be no clear path to not completely ensure that these products are safe and that the issues initially were identified have been resolved. There is also no clear understanding whether use of these units will magnify existing health problems and be impacted by the Covid 19 pandemic emergency.</p>	M	Kozu		Boston	MA	mkozu@projectrightinc.org	
7/15/2020 16:39	<p>Sale should remain prohibited. Unhealthy.. youths are attracted to this. We need to protect our I'll informed youths.</p>	Judith	Mills		Berlin	MA		

7/15/2020 16:44	<p>CONTAMINATED QUARANTINED VAPES SHOULD BE DESTROYED, NOT RETURNED TO THE RETAIL MARKET. Under no conditions should the CCC allow the sale of vaporizer products that were prohibited for sale or subjected to quarantine, during the identified time period. Allowing the sale of these products puts consumer health and safety at risk, with legal responsibility sitting with the CCC and the State. The product testing has shown that contaminant content in the products is inconsistent at best. The longer these products sit, the greater the chance more heavy metals from cartridges will be leaching into oils. The health risks are myriad and safety cannot be assured. This is consistent with whistleblower reports that they have experienced "heavy metal poisoning" as a result of using the legal product they sold in Massachusetts.</p> <p>Additionally, products which have tested positive for mold and illegal pesticides have been ordered to be destroyed. The same should be ordered for these unsafe products which jeopardize consumer health and safety.</p> <p>Reports indicate that some products tested contained high levels of lead and CCC Executive Director Shawn Collins has reportedly said that if consumers had vaping products that they purchased prior to the ban, they may contain lead.</p> <p>The CCC has reported that only a "representative sample" of these quarantined vapes have been tested, and that they have not been tested for all possible contaminants. These findings are consistent with study reports in the scientific literature.</p> <p>For example, based on results from one study (Lead and Other Toxic Metals Found in E-Cigarette 'Vapors': POTENTIALLY DANGEROUS LEVELS OF METALS LEAK FROM SOME E-CIGARETTE HEATING COILS; Hess et al, 2017 and Johns Hopkins Bloomberg School of Public Health News Release, 2018), the</p>	Karen	Walsh Pio		South Hadley	MA	kwalshpio@shschools.com	4135385063
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7/15/2020 16:48	<p>Dear CCC,</p> <p>As a resident of Northampton, I was pleased that NETA took vaping products off the shelves when safety concerns were highlighted by the vape health crisis--much of which centered around devices used for marijuana consumption.</p> <p>Our local paper, the Daily Hampshire Gazette revealed concerns also about lead and other heavy metals found in state testing of marijuana and the delivery devises. See: https://www.gazettenet.com/State-tests-of-marijuana-vapes-shows-high-lead-levels-in-some-local-products-31527923</p> <p>In the midst of our current corona-virus crisis, and amid criticism that the CDC and public officials did not do enough, we need to maintain strong public health standards for this new industry to protect public health first with the understanding that it is always harder to roll back on laws and regulations once they are loosened.</p> <p>Below is a statement that I completely agree with, that was sent to me: CONTAMINATED QUARANTINED VAPES SHOULD BE DESTROYED, NOT RETURNED TO THE RETAIL MARKET. Under no conditions should the CCC allow the sale of vaporizer products that were prohibited for sale or subjected to quarantine, during the identified time period. Allowing the sale of these products puts consumer health and safety at risk, with legal responsibility sitting with the CCC and the State. The product testing has shown that contaminant content in the products is inconsistent at best. The longer these products sit, the greater the chance more heavy metals from cartridges will be leaching into oils. The health risks are myriad and safety cannot be assured. This is consistent with whistleblower reports</p>	Heather	Warner		Northampton	Massachusetts	heatherwarner@comcast.net	6034757713
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7/15/2020 16:55	<p>On December 12, 2019, the Commission issued its First Amended Quarantine Order Applying to Vaporizer Products with Conditions (the "Amended Quarantine Order"). The Amended Quarantine Order allowed for the display, sale, and distribution of devices designed to vaporize marijuana concentrate subject to conditions specified in the Amended Quarantine Order and after submission of test results to the Commission in accordance with 935 CMR 500.160(1) and 935 CMR 501.160(a). Additionally, those products were required to first be tested for the presence of vitamin e acetate ("VEA") and a full contaminant screening panel in accordance with 935 CMR 500.160(2), the Commission's Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products, and validated methods for VEA screening. However, vaporizer products manufactured prior the Effective Date of the Amended Quarantine Order were ordered to remain in quarantine, as the Commission stated its investigation into the presence of contaminants was still ongoing.</p> <p>It is the fate of these still-quarantined products that is the subject of the Commission's inquiry. Complicating matters is that those products have now spent nearly 10 months in quarantine. As a result, the expiration date for many of the products is fast-approaching. With that in mind, this Commenter proposes that the Commission allow licensees to use the cannabis oil contained in the products still in quarantine and remediate/process that oil to make distillate. That distillate could then be used by licensees to create fresh cannabis-infused products, which would have a new expiration date. By allowing the existing cannabis oil to be remediated, the products would also be subject to new testing in accordance with the above regulations and protocols, which should assuage any concerns the Commission may have in that regard.</p>			Submitted on behalf of a commenter that wished to remain anonymous, but please reach out to rebecca@vicentesederberg.com with any questions.				
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7/15/2020 16:55	<p>Please continue to test the cartridge contents for heavy metals.</p> <p>The results collected so far are inconsistent for many of the reasons listed above. The many product hardware types are unlikely to have uniform quality control standards. For example, one cartridge brand may have a 'failure' where excessive leaching occurs in 10% of the products, and another cartridge brand may have a smaller amount of leaching happening in ALL of the cartridges. The establishment of a model for one product type does not necessarily hold up for another cartridge type.</p> <p>I believe the best course of action is to be transparent to the public about what is known and unknown. Establish a sampling plan (with number of sub-samples that must be tested per batch, etc) and calculate the sampling uncertainty associated with the sampling plan. Then identify the products prior to sale and communicate the risks to the buyer. The DPH has public health experts who are qualified to help, or hire an outside toxicologist to help create a plan.</p> <p>VEA was not found in any of these samples, so additional VEA testing is unlikely to yield useful information. It is also unreasonable to think that other contaminants have made their way into these cartridges, such as pesticides or microbiological contaminants.</p>	Michael	Kahn	Manager		MA	mikahn@mcrllabs.com	
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7/15/2020 16:55

There is no question in my mind that the contaminated quarantined vapes should be destroyed and not returned to the retail market under any conditions. Why take a chance with people's health? The risks are too high - especially during a lung pandemic that we have been battling for 4 months and will be battling for the foreseeable future. People are already at risk for contracting COVID-19 and having serious injury to their lungs. Why take a chance with questionable vape products that may also damage the lungs?

Under no conditions should the CCC allow the sale of vape products that were prohibited for sale or subjected to quarantine, during the identified time period. Allowing the sale of these products puts consumer health and safety at risk, with legal responsibility sitting with the CCC and the State.

The product testing has shown that the contaminant content in these vape products is inconsistent at best. The longer these products sit on the shelf, the greater the chance that more heavy metals from the cartridges will be leaching into the oils. The safety of these products cannot be assured and so they must be destroyed. In the interest of public health, I am surprised the CCC hasn't already made a unanimous decision to destroy these contaminated vape products.

Theresa

Hoggins

Harvard

MA

theresahoggins@verizon.net

7/15/2020 17:11	<p>I agree with this statement: CONTAMINATED QUARANTINED VAPES SHOULD BE DESTROYED, NOT RETURNED TO THE RETAIL MARKET. Under no conditions should the CCC allow the sale of vaporizer products that were prohibited for sale or subjected to quarantine, during the identified time period. Allowing the sale of these products puts consumer health and safety at risk, with legal responsibility sitting with the CCC and the State. The product testing has shown that contaminant content in the products is inconsistent at best. The longer these products sit, the greater the chance more heavy metals from cartridges will be leaching into oils. The health risks are myriad and safety cannot be assured. This is consistent with whistleblower reports that they have experienced "heavy metal poisoning" as a result of using the legal product they sold in Massachusetts.</p> <p>Additionally, products which have tested positive for mold and illegal pesticides have been ordered to be destroyed. The same should be ordered for these unsafe products which jeopardize consumer health and safety.</p> <p>Reports indicate that some products tested contained high levels of lead and CCC Executive Director Shawn Collins has reportedly said that if consumers had vaping products that they purchased prior to the ban, they may contain lead.</p> <p>The CCC has reported that only a "representative sample" of these quarantined vapes have been tested, and that they have not been tested for all possible contaminants. These findings are consistent with study reports in the scientific literature.</p> <p>For example, based on results from one study (Lead and Other Toxic Metals Found in E-Cigarette 'Vapors': POTENTIALLY DANGEROUS LEVELS OF METALS LEAK FROM SOME E-CIGARETTE HEATING COILS; Hess et al, 2017 and</p>	Ruth	Ever		Northampton	ma	ruthevercoaching@gmail.com	
7/15/2020 19:59	<p>QUARANTINED VAPES SHOULD BE DESTROYED, NOT RETURNED TO THE RETAIL MARKET.</p>							
7/15/2020 20:17	<p>I have purchased a small vaporizer that has port to charge it.. its dainty fits in. Compact pouch in my purse. I have purchased 2 cartridges , hope to be able to continue buying the cartridges to fit my vaping tool.</p>	Susan	HANNON	RETIRED & MIDICINAL USE	sAttboro	Ma.	Susanhannon72583@gmail.com	5088387157

7/15/2020 20:48	<p>CONTAMINATED VAPES SHOULD BE DESTROYED, NOT RETURNED TO THE RETAIL MARKET. Under no circumstances should the CCC allow the sale of vaporizer products that were subjected to quarantine and prohibited for sale. Back in December 2019, 12% of quarantined vape cartridges that had previously passed 3rd party laboratory testing for lead, failed when retested, one over 50x the lead limit. It is apparent that there is a very big problem with regulation and laboratory testing, one that endangers public health.</p> <p>I worked in the Massachusetts marijuana industry for 1.5 years and learned that the regulations and laboratory testing for marijuana products are woefully deficient, allowing marijuana products contaminated with mold, hydrogen peroxide, and pesticides and fungicides containing heavy metals to be sold to the trusting public.</p> <p>I experienced the extremely harmful effects of contaminated marijuana products, diagnosed with heavy metal poisoning, more than 3 times the norm for lead. In addition my body contained high levels of nickel and thallium, heavy metals which are a known health hazard in the marijuana industry's products, however the Commonwealth currently does not require testing.</p> <p>It has been reported that vape cartridges acquired from Massachusetts marijuana dispensaries resulted in EVAPI lung illness cases. While Vitamin E is presented as the likely culprit, the cause of the harm has not been fully investigated nor researched. Other additives such as terpenes and propylene glycol are known to cause adverse health effects when vaped.</p> <p>There is also the fact that cheap Chinese vape cartridge hardware is a known health</p>	Anne	Hassel	Physical Therapist/Ex-MA Registered Marijuana Dispensary Agent	Chicopee	MA	annehasselpt@gmail.com	4135373062
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