



October Public Meeting

Remote Via Teams



Meeting Book - October Public Meeting Packet

Table of Contents

Call to Order & Chair's Comments/Updates

Chair Hoffman

20210921_MEETING AGENDA 10.14.2021.docx

Minutes

20210917_Mins_Public Meeting_For Commission Consideration.docx

Executive Director's Report

Shawn Collins

Staff Recommendations on Changes of Ownership

F-COO XS-HIGHER PURPOSE CORPORATION-v.2.docx

F-COO XS-J .B.A.M. INC.-v.2.docx

F-COO XS-TREE MARKET LYNN, LLC-v.2.docx

F-COO XS-TREE MARKET TAUNTON, LLC-v.2.docx

F-COO XS-VAN GARDEN CANNABIS LLC-v.2.docx

Staff Recommendations on Renewals

ME RENEWAL XS-OCTOBER-v.2.docx

MTC RENEWAL XS-OCTOBER-v.2.docx

Staff Recommendations on Final Licenses

FL XS-ASCEND MASS. LLC-MR282837-v.2.docx

FL XS-CAC-MR282339-v.2.docx

FL XS-HIDDEN HEMLOCK, LLC-MB281355-v.2.docx

FL XS-MELLOW FELLOWS, LLC-MR281811-v.2.docx

FL XS-NEW ENGLAND TREATMENT ACCESS, LLC-MR283065-v.2.docx

FL XS-QPS MASSACHUSETTS HOLDINGS, INC-MC281517-MP281696-v.2.docx

FL XS-THE BOTANIST, INC-MP281672-v.2.docx

FL XS-UMA FLOWERS, LLC-MR283143-v.2.docx

MFL XS-NEW ENGLAND TREATMENT ACCESS, LLC-RMD3028-v.2.docx

Staff Recommendation on Provisional Licenses

PL XS-617 THERAPEUTIC HEALTHCARE, INC.-MRN283963-v2.docx

PL XS-620 INDUSTRIES, INC-MCN283511-v.2.docx

PL XS-EAST BOSTON LOCAL ROOTS, LLC-MRN28411-v.2.docx

PL XS-FADED, LLC-MPN282090-v.2.docx

PL XS-FADED, LLC-MXN281395-v.2.docx

PL XS-FISH ROAD, LLC-MCN283477-v.2.docx

PL XS-FOREST WILDE, LLC-MPN282058-MRN284185-v.2.docx

PL XS-GREENGRAB, INC-MDA1263-v.2.docx

PL XS-HIGHDRATION, LLC-MPN282070-v.2.docx

PL XS-HIGHMARK PROVISIONS, LLC-MCN283492-v.2.docx

PL XS-KG COLLECTIVE BROCKTON-MRN281374-v.2.docx

PL XS-MASSACHUSETTS GREEN RETAIL, INC-MRN284144-v.2.docx

PL XS-STANDISH GREEN GROUP, LLC-MCN283052-MPN282080-v.2.docx

PL XS-THE GREEN LADY DISPENSARY II-MRN284161-v.2.docx

PL XS-WISE MAN GENETICS, LLC-MBN281858-v.2.docx

Commission Discussion & Votes

20211005-THC Potency Report- FINAL.pdf

CCC Fourth Annual Activities Report 2021 Final Draft_SCEdits.docx

FINAL - Constituent Services Manager_for approval.pdf

20210928_TAB A_Bartucca.v2.docx

20210928_TAB B_Cannabis Trainers.v2.docx

20210928_TAB C_Medical Marijuana 411.v2.docx

20210928_TAB D_Stoker.v2.docx

20210928_TAB E_Quality Control Analytics.v2.docx

Next Meeting Date & Adjournment

20210930_PPT_Public Meeting.pptx

October 12, 2021

In accordance with Sections 18-25 of Chapter 30A of the Massachusetts General Laws and Chapter 20 of the Acts of 2021, notice is hereby given of a meeting of the Cannabis Control Commission. The meeting will take place as noted below.

CANNABIS CONTROL COMMISSION

**October 14, 2021
10:00AM**

Via Remote Participation via [Microsoft Teams Live](#)*

PUBLIC MEETING AGENDA

- 1) Call to Order
- 2) Chairman's Comments and Updates
- 3) Minutes for Approval
- 4) Executive Director's Report
 - a. FY 2021 Budget Update and Close Out
- 5) Staff Recommendations on Changes of Ownership
 - a. Higher Purpose Corporation
 - b. J-B.A.M., Inc.
 - c. Tree Market Lynn, LLC
 - d. Tree Market Taunton, LLC
 - e. Van Garden Cannabis, LLC fka CannAssist, LLC
- 6) Staff Recommendations on Renewals
 - a. 617 Therapeutic Health Care, Inc. (#MCR140031)
 - b. BKPN LLC (#MRR205850)
 - c. Buddies Ice Cream, Inc. (#MBR169274)
 - d. Canna Provisions Inc. (#MCR140091)
 - e. Canna Provisions Inc. (#MCR140093)
 - f. Central Ave Compassionate Care, Inc. (#MCR140068)
 - g. Central Ave Compassionate Care, Inc. (#MPR243667)
 - h. Coastal Cultivars, LLC (#MCR140040)



- i. Curaleaf Massachusetts, Inc. (#MRR205868)
- j. Curaleaf Massachusetts, Inc. (#MCR140076)
- k. Curaleaf Massachusetts, Inc. (#MPR243677)
- l. Deerfield Naturals, Inc. (#MCR140087)
- m. Deerfield Naturals, Inc. (#MPR243683)
- n. Deerfield Naturals, Inc. (#MRR205877)
- o. Four Score Holdings LLC (#MCR140084)
- p. Four Score Holdings LLC (#MPR243681)
- q. Four Score Holdings LLC (#MRR205874)
- r. High Hopes (#MRR205856)
- s. Impressed LLC (#MCR140098)
- t. KRD Growers, LLC (#MPR243668)
- u. Liberty Market (#MRR205826)
- v. Mass Wellspring LLC (#MRR205878)
- w. Mill Town Agriculture, LLC (#MCR140102)
- x. ReLeaf Alternative Inc. (#MRR205881)
- y. The Blue Jay Botanicals, Inc. (#MRR205833)
- z. The Green Harbor Dispensary, LLC (#MRR205879)
- aa. Theory Wellness, Inc. (#MCR140069)
- bb. Theory Wellness, Inc. (#MPR243669)
- cc. Theory Wellness, Inc. (#MRR205859)
- dd. ACK Natural, LLC (#RMD1627)
- ee. Alternative Therapies Group, Inc. (#RMD1530)
- ff. Apothca, Inc. (#RMD345)
- gg. Bask, Inc. (#RMD445)
- hh. Cultivate Leicester, Inc. (#RMD3193)
- ii. HVV Massachusetts, Inc., Vertically Integrated Medical Marijuana Treatment Center
- jj. HVV Massachusetts, Inc. (#RMD1185)
- kk. Life Essence, Inc., Vertically Integrated Medical Marijuana Treatment Center (Holyoke – Cambridge)
- ll. Life Essence, Inc., Vertically Integrated Medical Marijuana Treatment Center (Holyoke – Holyoke)
- mm. Life Essence, Inc. (#RMD1365)
- nn. Middlesex Integrative Medicine, Inc. (#RMD1025)
- oo. Nature Medicines, LLC (#RMD1045)



- pp. FFD Enterprises fka PCMV (#RMD1165)
- qq. Patriot Care Corp. (#RMD265)
- rr. Patriot Care Corp. (#RMD727)
- ss. The Green Harbor Dispensary, LLC (#RMD1305)
- tt. The Heirloom Collective, Inc. (#RMD825)

7) Staff Recommendations on Final Licenses

- a. Ascend Mass, LLC (#MR282837), Retail
- b. Commonwealth Alternative Care, Inc. (#MR282339), Retail
- c. Hidden Hemlock, LLC (#MB281355), Microbusiness
- d. Mellow Fellows, LLC (#MR281811), Retail
- e. New England Treatment Access, LLC (#MR283065), Retail
- f. QPS Massachusetts Holdings, Inc. (#MC281517), Cultivation, Tier 3 / Indoor
- g. QPS Massachusetts Holdings, Inc. (#MP281696), Product Manufacturer
- h. The Botanist, Inc. (#MP281672), Product Manufacturer
- i. Uma Flowers, LLC (#MR283143), Retail
- j. New England Treatment Access, LLC (#RMD3028), Vertically Integrated Medical Marijuana Treatment Center

8) Staff Recommendations on Provisional Licenses

- a. 617 Therapeutic Health Care, Inc. (#MRN283963), Retail
- b. 620 Industries, Inc. (#MCN283511), Cultivation, Tier 1 / Indoor
- c. East Boston Local Roots, LLC (#MRN284117), Retail
- d. Faded, LLC (#MPN282090), Product Manufacturer
- e. Faded, LLC (#MXN281395), Transporter with Other ME License
- f. Fish Road, LLC (#MCN283477), Cultivation, Tier 6 / Indoor
- g. Forest Wilde, LLC (#MPN282058), Product Manufacturer
- h. Forest Wilde, LLC (#MRN284185), Retail
- i. GreenGrab, Inc. (#MDA1263), Marijuana Delivery Operator
- j. Highdration, LLC (#MPN282070), Product Manufacturer
- k. Highmark Provisions, LLC (#MCN283492), Cultivation, Tier 2 / Indoor
- l. KG Collective Brockton (#MRN281374), Retail
- m. Massachusetts Green Retail, Inc. (#MRN284144), Retail
- n. Standish Green Group, LLC (#MCN283502), Cultivation, Tier 3 / Indoor
- o. Standish Green Group, LLC (#MPN282080), Product Manufacturer
- p. The Green Lady Dispensary II, Inc. (#MRN284161), Retail
- q. Wise Man Genetics, LLC (#MBN281858), Microbusiness

9) Commission Discussion and Votes



- a. Research Report: High Tetrahydrocannabinol (THC) Cannabis and Effects on the Human Body: More Research Needed
 - b. Annual Activities Report
 - c. Job Description: Constituent Services Manager
 - d. Responsible Vendor Training Renewals
 - i. Bartucca Consulting
 - ii. Cannabis Trainers
 - iii. Medical Marijuana 411
 - iv. Stoker Consulting
 - v. Quality Control Analytics
 - e. Disproportionately Impacted Areas
- 10) New Business the Chair Did Not Anticipate at the Time of Posting
- 11) Next Meeting Date
- 12) Adjournment

*Closed captions available



CANNABIS CONTROL COMMISSION

**September 17, 2021
10:00AM**

Via Remote Participation via [Microsoft Teams Live*](#)

PUBLIC MEETING MINUTES

Documents:

- Application materials associated with:
 - Staff Recommendations on Changes of Ownership
 - DMA Holdings LLC
 - Staff Recommendations on Renewals
 - 202 Trading Company, Inc. (#MRR205849)
 - 253 Organics, LLC (#MCR140047)
 - 253 Organics, LLC (#MRR205865)
 - Alternative Therapies Group, II, Inc. (#MRR205824)
 - Atlantic Medicinal Partners, Inc. (#MRR205716)
 - B Leaf Wellness Centre LLC (#MRR205866)
 - Berkshire Roots Inc. (#MRR205803)
 - Blackstone Valley Naturals, LLC (#MBR169277)
 - Bud's Goods & Provisions Corp. (#MCR140045)
 - Bud's Goods & Provisions Corp. (#MPR243654)
 - Budda Brothers 90 Sargeant Street LLC (#MCR140016)
 - Budda Brothers 90 Sargeant Street LLC (#MPR243625)
 - Cedar Roots LLC (#MCR140059)
 - Cedar Roots LLC (#MPR243658)
 - Cloud Creamery LLC (#MPR243660)
 - Coastal Solutions (#MTR263101)
 - Cosmopolitan Dispensary, Inc. (#MRR205847)
 - Cultivate Cultivation, LLC (#MCR140073)
 - Cultivate Cultivation, LLC (#MPR243675)
 - Cultivate Leicester, Inc. (#MRR205864)
 - Curaleaf North Shore, Inc. (#MCR140063)
 - Curaleaf North Shore, Inc. (#MPR243663)
 - Delta 420 LLC (#MRR205842)



- FFD Enterprises MA, Inc. (#MCR140032)
- FFD Enterprises MA, Inc. (#MPR243639)
- FFD Enterprises MA, Inc. (#MRR205796)
- Fresh Fields Lowell LLC (#MRR205814)
- Good Chemistry of Massachusetts, Inc. (#MRR205830)
- Green River Cannabis Company Inc (#MRR205855)
- Greenhouse Naturals LLC (#MRR205800)
- Grow Rite, LLC (#MCR140074)
- Harmony of MA, Inc. (#MRR205862)
- HVV Massachusetts, Inc. (#MCR140039)
- HVV Massachusetts, Inc. (#MPR243647)
- HVV Massachusetts, Inc. (#MRR205810)
- I.N.S.A., Inc. (#MCR140061)
- I.N.S.A., Inc. (#MPR243662)
- I.N.S.A., Inc. (#MRR205843)
- Late Spring, Inc. (#MRR205853)
- Littleton Apothecary LLC (#MRR205828)
- Local Roots NE Inc. (#MRR205851)
- MCR Labs, LLC (#ILR267895)
- Minuteman Farm, LLC (#MCR140067)
- Nature's Medicines, Inc. (#MCR140065)
- Nature's Medicines, Inc. (#MRR205845)
- Nature's Medicines, Inc. (#MRR205846)
- Nature's Medicines, Inc. (#MRR205825)
- NEO Manufacturing MA LLC (#MCR140057)
- NEO Manufacturing MA LLC (#MPR243659)
- New England Treatment Access, LLC (#MCR140053)
- New England Treatment Access, LLC (#MPR243651)
- New England Treatment Access, LLC (#MRR205840)
- New England Treatment Access, LLC (#MRR205839)
- New England Treatment Access, LLC (#MRR205835)
- New Leaf Enterprises, Inc. (#MRR205822)
- New Leaf Enterprises, Inc. (#MRR205820)
- Northeast Alternatives, Inc. (#MCR140062)
- Northeast Alternatives, Inc. (#MPR243672)
- Northeast Alternatives, Inc. (#MRR205857)
- Pharmacannis Massachusetts Inc. (#MRR205831)
- Pure Oasis LLC (#MRR205797)
- Silver Therapeutics, Inc. (#MMCR140077)



- Silver Therapeutics, Inc. (#MMPR243661)
- Silver Therapeutics, Inc. (#MMPR243678)
- Silver Therapeutics, Inc. (#MRR205870)
- Sira Naturals, Inc. (#MCR140058)
- Sira Naturals, Inc. (#MPR243665)
- Sira Naturals, Inc. (#MXR126659)
- The Healing Center LLC (#MRR205871)
- Team Green, LLC (#MRR205838)
- Terpene Journey, LLC (#MRR205791)
- The Heirloom Collective, Inc. (#MCR140054)
- The Heirloom Collective, Inc. (#MPR243657)
- Turning Leaf Centers Northampton, LLC (#MRR205778)
- Western Front, LLC (#MRR205827)
- Ermont, Inc. (#RMD225)
- Good Chemistry of Massachusetts, Inc. (#RMD3061)
- Holistic Health Group, Inc. (#RMD1566)
- M3 Ventures, Inc. (#RMD465)
- M3 Ventures, Inc. (#RMD806)
- Mass Wellspring, LLC (#RMD665)
- Mayflower Medicinals, Inc., Vertically Integrated Medical Marijuana Treatment Center
- Mission MA, Inc. (#RMD1125)
- New England Treatment Access, LLC (#RMD3028)
- Silver Therapeutics, Inc. (#RMD3059)
- Staff Recommendations on Final Licenses
 - 208 Worcester Street, LLC (#MR283652), Retail
 - Artis, LLC (#DO100113), Marijuana Courier
 - Caroline's Cannabis, LLC (#MR283694), Retail
 - CommCan, Inc. (#MR283001), Retail
 - Enlite Cannabis Dispensary, LLC (#MR281867), Retail
 - Four Daughters Compassionate Care, Inc. (#MC282243), Cultivation, Tier 4 / Indoor
 - Four Daughters Compassionate Care, Inc. (#MP281715), Product Manufacturer
 - Green Thumb Growers, LLC (#MB281692), Microbusiness
 - Heal Provincetown, Inc. (#MR282621), Retail
 - Herbal Pathways, LLC (#MR282037), Retail
 - Kaycha MA, LLC (#IL281349), Independent Testing Laboratory
 - Local Roots NE, Inc. (#MR283723), Retail



- MJ's Market, Inc. (#MR281457), Retail
- New England Craft Cultivators, LLC (#MR283416), Retail
- Paper Crane Provisions, LLC (#MC283300), Cultivation, Tier 6 / Outdoor
- Pure Botanicals, LLC (#MC281770), Cultivation, Tier 1 / Indoor
- Royal Sun Farm, LLC (#MC282001), Cultivation, Tier 6 / Outdoor
- The Haven Center, Inc. (#MR281258), Retail
- Four Daughters Compassionate Care, Inc. (#MTC1691), Vertically Integrated Medical Marijuana Treatment Center
- Staff Recommendations on Provisional Licenses
 - Evokanna Labs, LLC (#MCN283141), Cultivation, Tier 4 / Indoor
 - Evokanna Labs, LLC (#MPN281969), Product Manufacturer
 - Evokanna Labs, LLC (#MXN281382), Transporter with Other ME License
 - Frozen 4 Corporation (#MCN283525), Cultivation, Tier 2 / Indoor
 - MAIA Advanced Organics, Inc. (#MCN283086), Cultivation, Tier 5 / Indoor
 - MAIA Advanced Organics, Inc. (#MPN281960), Product Manufacturer
 - Mass Cannabis Growers Cooperative (#CON281452), Craft Marijuana Cooperative, Tier 3 / Indoor
 - Misty Mountain Shop, LLC (#MRN282634), Retail
 - Neamat, LLC (#MPN282004), Product Manufacturer
 - North Country Production, LLC (#MCN283161), Cultivation, Tier 6 / Indoor
 - Pepperell Roots, LLC (#MCN283252), Cultivation, Tier 1 / Indoor
 - Pepperell Roots, LLC (#MPN282002), Product Manufacturer
 - Pepperell Roots, LLC (#MCN283254), Cultivation, Tier 6 / Indoor
 - Spencer House, LLC (#MRN284143), Retail
 - Sugar Grove, LLC (#MCN283194), Cultivation, Tier 2 / Indoor
 - Sugar Grove, LLC (#MPN282044), Product Manufacturer
 - The Heritage Club, LLC (#MRN282762), Retail
 - Verdant Reparative, Inc. (#MPN282085), Product Manufacturer
 - Verdant Reparative, Inc. (#MRN282752), Retail
 - Zip Run, Inc. (#DOA100102), Marijuana Courier
 - Alchemy League (#RMDA3481), Vertically Integrated Medical Marijuana Treatment Center
- [Meeting Packet](#)
- Job Description for Director of Testing



- Responsible Vendor Training Materials
 - Train to Tend
 - ELearn Cannabis Academy
 - Willow Street Legal, LLC
- Memorandum re: Schedule for Review and Approval of Executive Director's Performance Goals
- Memorandum re: Commission Consideration of Options to Extend or Reissue COVID-19 Curbside Order and the Telehealth Bulletin
- Memorandum re: Discussion on adding Lawrence to the current DIA list

In Attendance:

- Chairman Steven Hoffman
- Commissioner Ava Callender Concepcion
- Commissioner Nurys Z. Camargo
- Commissioner Kimberly Roy
- Commissioner Bruce Stebbins

Minutes:

- 1) Call to Order
 - The Chairman recognized a quorum and called the meeting to order.
 - The Chairman gave notice that the meeting is being recorded.
- 2) Chairman's Comments and Updates
 - The Chairman apologized for the last minute change for the date of the meeting and thanked everyone, inside and outside the Commission, for their flexibility.
 - Commissioner Roy thanked staff for their work preparing for the meeting.
 - Commissioner Stebbins noted that he was able to give a presentation to the Rotary Club in Springfield and thanked staff, in particular the Communications staff, for helping him prepare.
 - Commissioner Camargo thanked staff, in particular the Executive Director. Commissioner Camargo also noted that she and Commissioner Concepcion were invited by former Commissioner Title to a NECANN panel and expressed here excitement to be engaging with the community.
 - Commissioner Concepcion echoed Commissioner Camargo's thanks for the organizers and attendees at the NECANN conference.
 - The Chairman gave an overview of the agenda.
- 3) Minutes for Approval – 0:04:50
 - a. Executive Session Minutes
 - The Chairman gave an overview of the topic.



- The Chairman announced that at the Commission's August meeting, the Commission conducted a periodic review of the minutes from executive sessions to determine if the purposes for entering executive session under the Open Meeting Law still apply. The Commission has determined that the minutes from three executive sessions warrant continued non-disclosure. Minutes for the executive session held on July 9, 2020, are being withheld because of ongoing discussions between the Commission and a labor organization. Minutes for the executive session held on October 8, 2020, are being withheld because information discussed are subject to non-disclosure pursuant to a court order. Minutes for the executive session held on November 19, 2020, are being withheld because information discussed is subject to nondisclosure pursuant to a court order and is subject to pending litigation. The Commission will vote today to approve all other previously withheld executive session minutes. For more information, please see the memorandum considered by the Commission, which is included in the August meeting materials.
- January 24, 2019
 - The Chairman asked if the Commissioners had a chance to review the minutes and whether there were questions or edits.
 - Commissioner Roy moved to approve the executive session minutes for the January 24, 2019, meeting.
 - Commissioner Stebbins seconded the motion.
 - The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
 - The Commission unanimously approved the executive session minutes for the January 24, 2019, meeting.
- June 4, 2020
 - The Chairman asked if the Commissioners had a chance to review the minutes and whether there were questions or edits.
 - Commissioner Concepcion moved to approve the executive session minutes for the June 4, 2020, meeting.
 - Commissioner Camargo seconded the motion.
 - The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
 - The Commission unanimously approved the executive session minutes for the June 4, 2020, meeting.



- June 17, 2021
 - The Chairman asked if the Commissioners had a chance to review the minutes and whether there were questions or edits.
 - Commissioner Stebbins moved to approve the executive session minutes for the June 17, 2021, meeting.
 - Commissioner Roy seconded the motion.
 - The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
 - The Commission unanimously approved the executive session minutes for the June 17, 2021, meeting.
- July 15, 2021
 - The Chairman asked if the Commissioners had a chance to review the minutes and whether there were questions or edits.
 - Commissioner Camargo moved to approve the executive session minutes for the July 15, 2021, meeting.
 - Commissioner Concepcion seconded the motion.
 - The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
 - The Commission unanimously approved the executive session minutes for the July 15, 2021, meeting.

b. Public Meeting Minutes

- August 12, 2021
 - The Chairman asked if the Commissioners had a chance to review the minutes and whether there were questions or edits.
 - Commissioner Roy moved to approve the minutes for the August 12, 2021, Commission public meeting.
 - Commissioner Stebbins seconded the motion.
 - The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes



- The Commission unanimously approved the minutes for the August 12, 2021, meeting.

4) Executive Director's Report – 00:12:32

- The Executive Director gave an overview of licensing data, as laid out on page 188 of the [meeting packet](#).
- Commissioner Concepcion asked a clarifying question with respect to the movement in the data slide for Economic Empowerment, Social Equity Program, and Disadvantaged Business Enterprise application status.
 - The Executive Director described how as applicants move through the process, they will move “downward” through the slide, and as numbers go down in one row of the spreadsheet, there should be corresponding increase in a lower row, commensurate with advancing toward commencing operations.
- Commissioner Camargo confirmed, with respect to Cultivation data, that it is not broken out by indoor and outdoor.
 - The Executive Director confirmed it is not, but stated that moving forward, that distinction can be made.
- The Chairman noted that caregiver regulations had changed and asked whether that has resulted in an increase in the number of caregivers registered.
 - The Executive Director said anecdotally, yes, but likely the regulatory change would result in the increase in the number of patients registered in relation to caregivers.
- Commissioner Roy noted that it seems like there were a large number of licenses that have expired and asked for explanation as to why a license might expire.
 - The Executive Director said that the license fee is expensive and given the requirement of vertical integration, is an intensive and complex process, so it can be a barrier to entry, and some folks may have pivoted to the adult-use market instead.
- The Executive Director gave an overview of Virtual Community Outreach Meetings Administrative Order allowing applicants and licensees to conduct community outreach meetings through April 1, 2022, subject to certain restrictions, including acceptance by the municipality, recordings, a neutral moderator, and submission of the recording with the application.
- The Executive Director updated that medical sales information has now been integrated into the open data platform and gave an overview of that data through July.
- The Executive Director gave an overview of the application process for Cohort 3 of the Social Equity Program, including the extension of the deadline for applying to the program to November 15, 2021. The Executive Director gave an overview of the engagement of a community outreach vendor to ensure a broad reach. The Executive Director noted that applications are reviewed on a rolling basis and made clear that immediately upon acceptance to the program, the benefits associated inure to the participant.



- Commissioner Stebbins noted the hard work of Director of Equity Programing and Community Outreach Kevin Sibley working with applicants.
- Commissioner Stebbins asked whether there were ways to reach folks who do not live in an Area of Disproportionate Impact but are otherwise eligible for the program.
- The Executive Director gave an overview of some of the outreach work done to date, but also the forward-looking steps to take to ensure all steps necessary are being taken to accomplish the requisite outreach.
- The Executive Director noted that the LMS program allows for greater scale up of the program.
- Commissioner Concepcion asked, out of the 502 applications, how many have been approved for the program.
 - The Executive Director noted that about 100 applications have been approved and just over 200 applications have been reviewed to date, though approximately half required a request for more information.
- Commissioner Roy asked if the Executive Director could give the statistics from the first two cohorts for comparison purposes and asked whether the delivery licenses have increased interest in the program.
 - The Executive Director said he believes the delivery licenses have made a difference and noted that the first two cohorts combined had roughly 400 accepted participants.
- The Executive Director gave a demographic breakdown and the track selected of the Social Equity Program applicants to date.
- The Chairman asked whether the program has been modified to include delivery related curriculum.
 - The Executive Director gave an overview of how that might be addressed.
- Commissioner Camargo commented that in discussions she and Commissioner Stebbins have had with community members, there are questions about the ancillary track of the Social Equity Program and the importance of that track in building an equitable cannabis industry. Commissioner Camargo noted that it will be interesting to see the residency breakdown of the Social Equity Program participants when available.
 - The Executive Director noted that part of the breakdown with respect to the Ancillary Track, the benefits of the program for non-licensed entities may not be clear. This will require the Commission to be proactive about outreach.
- Commissioner Camargo expressed her appreciation for the information with respect to the status as a farmer as it relates to conversations with community members she has had, and the information helps focus outreach.
- Commissioner Concepcion asked that after the program participants have been identified, a similar breakdown of demographics.
- The Executive Director gave a hiring update, including with respect to the Desktop Support Analyst position currently open for applications, the Executive Assistant position that is in screening and interview stage, the 9 investigators that have been onboarded during August, and final candidates being screened for the Associate Enforcement Counsel, Constituent Services Associate, and Research Analyst positions.



The Executive Director thanked Chief People Officer Erika White, Human Resources Generalist Silea Williams, and Human Resources and Operations Project Coordinator Wendy Sanchez.

- The Executive Director gave an overview of the FY22 budget.
- Commissioner Roy thanked the Executive Director, and asked, as a revenue generating agency, the Commission's contribution to the Commonwealth.
 - The Executive Director stated that non-tax revenue generated by the Commission is approximately \$25,060,000, an approximate \$10,000,000 surplus after subtracting the Commission's budget appropriation. The Executive Director recognized Chief Financial and Administrative Officer Adriana León, for her work managing and forecasting the budget so effectively.
 - Commissioner Roy followed up to ask what time frame that revenue number applied to and if there was an estimate of the tax revenue generated from the industry.
 - The Executive director said the number given was for Fiscal Year 2021 and said he would bring back additional information at the next meeting.
- Commissioner Camargo asked about the Cannabis Regulation Fund and how that is being spent, expressing how members of the public would likely be interested to see how that money is being spent.
 - The Executive Director said that other than the appropriations to the Commission, it would require a review of the appropriations act to determine that and that he would report back.
- Commissioner Roy thanked the Executive Director for increasing the number of investigators, as that will support the Commission's goal of 100% compliance in an exponentially growing industry.

5) Staff Recommendations on Changes of Ownership – 01:05:45

a. DMA Holdings LLC

- Licensing Manager Defoe in presented the Staff Recommendation for Change of Ownership.
- The Chairman asked for questions or comments.
- Commissioner Camargo moved to approve the Change of Ownership.
- Commissioner Concepcion seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the Change of Ownership.

6) Staff Recommendations on Renewals – 01:07:57



- Commissioner Camargo commented that she looks at renewals because it is an opportunity to see where licensees are with their Positive Impact Plans and Diversity Plans. Commissioner Camargo said that she can see progress among licensees. Commissioner Camargo gave a shout out to 253 Organics, LLC, Blackstone Valley Naturals, LLC, Cedar Roots LLC, Cloud Creamery LLC, Delta 420 LLC, Natural Medicines, Inc., Pharmacannis Massachusetts, Inc., Pure Oasis LLC, Sierra Naturals Inc., for their work contributing to their communities.
- The Chairman noted that Renewals will be considered as one or more rosters, subject to a Commissioner's request for individual treatment. The Commission will consider each for which a Commissioner requested individual treatment and then will consider the remaining applications in two rosters: (1) all other Adult-use applications; (2) the other medical-use renewals.
- Adult-Use Roster
 - Commissioner Stebbins moved to approve the remaining roster of adult-use Renewals.
 - Commissioner Roy seconded the motion.
 - The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
 - The Commission unanimously approved the remaining roster of adult-use Renewals.
- Medical-Use Roster
 - Commissioner Camargo moved to approve the roster of medical-use Renewals.
 - Commissioner Concepcion seconded the motion.
 - The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
 - The Commission unanimously approved the roster of medical-use Renewals.
- a. 202 Trading Company, Inc. (#MRR205849)
- b. 253 Organics, LLC (#MCR140047)
- c. 253 Organics, LLC (#MRR205865)
- d. Alternative Therapies Group, II, Inc. (#MRR205824)
- e. Atlantic Medicinal Partners, Inc. (#MRR205716)
- f. B Leaf Wellness Centre LLC (#MRR205866)



g. Berkshire Roots Inc. (#MRR205803)
h. Blackstone Valley Naturals, LLC (#MBR169277)
i. Bud's Goods & Provisions Corp. (#MCR140045)
j. Bud's Goods & Provisions Corp. (#MPR243654)
k. Budda Brothers 90 Sargeant Street LLC (#MCR140016)
l. Budda Brothers 90 Sargeant Street LLC (#MPR243625)
m. Cedar Roots LLC (#MCR140059)
n. Cedar Roots LLC (#MPR243658)
o. Cloud Creamery LLC (#MPR243660)
p. Coastal Solutions (#MTR263101)
q. Cosmopolitan Dispensary, Inc. (#MRR205847)
r. Cultivate Cultivation, LLC (#MCR140073)
s. Cultivate Cultivation, LLC (#MPR243675)
t. Cultivate Leicester, Inc. (#MRR205864)
u. Curaleaf North Shore, Inc. (#MCR140063)
v. Curaleaf North Shore, Inc. (#MPR243663)
w. Delta 420 LLC (#MRR205842)
x. FFD Enterprises MA, Inc. (#MCR140032)
y. FFD Enterprises MA, Inc. (#MPR243639)
z. FFD Enterprises MA, Inc. (#MRR205796)
aa. Fresh Fields Lowell LLC (#MRR205814)
bb. Good Chemistry of Massachusetts, Inc. (#MRR205830)
cc. Green River Cannabis Company Inc (#MRR205855)
dd. Greenhouse Naturals LLC (#MRR205800)
ee. Grow Rite, LLC (#MCR140074)
ff. Harmony of MA, Inc. (#MRR205862)
gg. HVV Massachusetts, Inc. (#MCR140039)
hh. HVV Massachusetts, Inc. (#MPR243647)
ii. HVV Massachusetts, Inc. (#MRR205810)
jj. I.N.S.A., Inc. (#MCR140061)
kk. I.N.S.A., Inc. (#MPR243662)
ll. I.N.S.A., Inc. (#MRR205843)
mm. Late Spring, Inc. (#MRR205853)
nn. Littleton Apothecary LLC (#MRR205828)
oo. Local Roots NE Inc. (#MRR205851)
pp. MCR Labs, LLC (#ILR267895)
qq. Minuteman Farm, LLC (#MCR140067)



rr. Nature's Medicines, Inc. (#MCR140065)

ss. Nature's Medicines, Inc. (#MRR205845)

tt. Nature's Medicines, Inc. (#MRR205846)

uu. Nature's Medicines, Inc. (#MRR205825)

- Commissioner Camargo requested a condition.
 - Proposed condition: Within 30 days, applicant to clarify if the \$5,000 donation to the NAACP for New Bedford is per license or per the four licenses.
- Commissioner Camargo moved to approve the Renewals, subject to the condition requested by Commissioner Camargo.
- Commissioner Concepcion seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the Renewals, subject to the condition requested by Commissioner Camargo.

vv. NEO Manufacturing MA LLC (#MCR140057)

ww. NEO Manufacturing MA LLC (#MPR243659)

xx. New England Treatment Access, LLC (#MCR140053)

yy. New England Treatment Access, LLC (#MPR243651)

zz. New England Treatment Access, LLC (#MRR205840)

aaa. New England Treatment Access, LLC (#MRR205839)

- Commissioner Camargo requested a condition.
 - Proposed condition: Within 90 days applicant to provide partnership letter from Western, MA college.
- Commissioner Roy moved to approve the Renewals, subject to the condition requested by Commissioner Camargo.
- Commissioner Stebbins seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the Renewals, subject to the condition requested by Commissioner Camargo.



bbb. New England Treatment Access, LLC (#MRR205835)

- Commissioner Stebbins moved to approve the Renewal, subject to the condition requested by Commissioner Camargo.
- Commissioner Roy seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the Renewal, subject to the condition requested by Commissioner Camargo.

ccc. New Leaf Enterprises, Inc. (#MRR205822)

ddd. New Leaf Enterprises, Inc. (#MRR205820)

eee. Northeast Alternatives, Inc. (#MCR140062)

fff. Northeast Alternatives, Inc. (#MPR243672)

ggg. Northeast Alternatives, Inc. (#MRR205857)

hhh. Pharmacannis Massachusetts Inc. (#MRR205831)

iii. Pure Oasis LLC (#MRR205797)

jjj. Silver Therapeutics, Inc. (#MMCR140077)

kkk. Silver Therapeutics, Inc. (#MMPR243661)

lll. Silver Therapeutics, Inc. (#MMPR243678)

mmm. Silver Therapeutics, Inc. (#MRR205870)

nnn. Sira Naturals, Inc. (#MCR140058)

ooo. Sira Naturals, Inc. (#MPR243665)

ppp. Sira Naturals, Inc. (#MXR126659)

qqq. The Healing Center LLC (#MRR205871)

rrr. Team Green, LLC (#MRR205838)

sss. Terpene Journey, LLC (#MRR205791)

ttt. The Heirloom Collective, Inc. (#MCR140054)

uuu. The Heirloom Collective, Inc. (#MPR243657)

vvv. Turning Leaf Centers Northampton, LLC (#MRR205778)

www. Western Front, LLC (#MRR205827) (end of Adult-Use)

xxx. Ermont, Inc. (#RMD225)

yyy. Good Chemistry of Massachusetts, Inc. (#RMD3061)

zzz. Holistic Health Group, Inc. (#RMD1566)

aaaa. M3 Ventures, Inc. (#RMD465)



bbbb. M3 Ventures, Inc. (#RMD806)

cccc. Mass Wellspring, LLC (#RMD665)

dddd. Mayflower Medicinals, Inc., Vertically Integrated Medical Marijuana Treatment Center

eeee. Mission MA, Inc. (#RMD1125)

ffff. New England Treatment Access, LLC (#RMD3028)

gggg. Silver Therapeutics, Inc. (#RMD3059)

7) Staff Recommendations on Final Licenses – 01:21:43

- The Chairman noted that the Commission considers Final Licenses as a roster unless a Commissioner requests otherwise. There are two rosters; (1) all adult-use licenses; (2) and (2) the sole medical-use license.

- Adult-Use Roster

- Commissioner Concepcion moved to approve the roster of adult-use Final Licenses.
- Commissioner Camargo seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the roster of adult-use Final Licenses.

- Medical-Use Final License

- Commissioner Roy moved to approve the medical-use Final License.
- Commissioner Stebbins seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the medical-use Final License.

a. 208 Worcester Street, LLC (#MR283652), Retail

b. Artis, LLC (#DO100113), Marijuana Courier

c. Caroline's Cannabis, LLC (#MR283694), Retail

d. CommCan, Inc. (#MR283001), Retail

e. Enlite Cannabis Dispensary, LLC (#MR281867), Retail

f. Four Daughters Compassionate Care, Inc. (#MC282243), Cultivation, Tier 4 / Indoor



- g. Four Daughters Compassionate Care, Inc. (#MP281715), Product Manufacturer
- h. Green Thumb Growers, LLC (#MB281692), Microbusiness
- i. Heal Provincetown, Inc. (#MR282621), Retail
- j. Herbal Pathways, LLC (#MR282037), Retail
- k. Kaycha MA, LLC (#IL281349), Independent Testing Laboratory
- l. Local Roots NE, Inc. (#MR283723), Retail
- m. MJ's Market, Inc. (#MR281457), Retail
- n. New England Craft Cultivators, LLC (#MR283416), Retail
- o. Paper Crane Provisions, LLC (#MC283300), Cultivation, Tier 6 / Outdoor
- p. Pure Botanicals, LLC (#MC281770), Cultivation, Tier 1 / Indoor
- q. Royal Sun Farm, LLC (#MC282001), Cultivation, Tier 6 / Outdoor
- r. The Haven Center, Inc. (#MR281258), Retail (end of Adult-Use)

- s. Four Daughters Compassionate Care, Inc. (#MTC1691), Vertically Integrated Medical Marijuana Treatment Center

The Commission took a brief recess until 11:35 A.M. (01:34:40).

8) Staff Recommendations on Provisional Licenses

- The Chairman noted that the Commission will consider each Provisional License application individually and will work to reconcile any duplicative conditions requested by the Commissioners.

- a. Evokanna Labs, LLC (#MCN283141), Cultivation, Tier 4 / Indoor
 - Licensing Manager Defoe presented the Staff Recommendation for all three Evokanna Labs, LLC Provisional Licenses, subject to separate votes.
 - The Chairman asked for questions or comments.
 - Commissioner Stebbins moved to approve the Provisional License.
 - Commissioner Roy seconded the motion.
 - The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
 - The Commission unanimously approved the Provisional License.

- b. Evokanna Labs, LLC (#MPN281969), Product Manufacturer
 - The Chairman asked for questions or comments.
 - Commissioner Roy moved to approve the Provisional License.
 - Commissioner Concepcion seconded the motion.



- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
 - The Commission unanimously approved the Provisional License.
- c. Evokanna Labs, LLC (#MXN281382), Transporter with Other ME License
- The Chairman asked for questions or comments.
 - Commissioner Concepcion moved to approve the Provisional License.
 - Commissioner Camargo seconded the motion.
 - The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
 - The Commission unanimously approved the Provisional License.
- d. Frozen 4 Corporation (#MCN283525), Cultivation, Tier 2 / Indoor
- Licensing Manager Defoe presented the Staff Recommendation for Provisional License.
 - The Chairman asked for questions or comments.
 - Commissioner Stebbins requested two conditions.
 - Proposed conditions:
 - Prior to Final Application for Licensure, review Positive Impact Plan and consider a strategy for outreach to residents of nearby Disproportionate Impact designated community of Mansfield for employment and provide any update.
 - Prior to Final Application for Licensure, clarify reference to Diversity Plan in Positive Impact Plan and provide any update.
 - Commissioner Roy commended the applicant for the generosity displayed in the Positive Impact Plan and the investment in the community.
 - Commissioner Camargo moved to approve the Provisional License, subject to the conditions requested by Commissioner Stebbins.
 - Commissioner Stebbins seconded the motion.
 - The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes



- The Commission unanimously approved the Provisional License, subject to the conditions requested by Commissioner Stebbins.

e. MAIA Advanced Organics, Inc. (#MCN283086), Cultivation, Tier 5 / Indoor

- Licensing Manager Defoe presented the Staff Recommendation for both MAIA Advanced Organics, Inc. Provisional Licenses, subject to separate votes.
- The Chairman asked for questions or comments.
- Commissioner Stebbins requested a condition to apply to both licenses.
 - Proposed condition: Prior to Final Application for Licensure, review Positive Impact Plan and consider a strategy for outreach to residents of nearby Disproportionate Impact designated community of Fitchburg for employment and provide any update.
- Commissioner Roy requested a condition to apply to both licenses.
 - Proposed condition: Prior to Final application for Licensure, please update Diversity Plan under programs section, namely sub-section six to also include veterans in hiring advertisements.
- Commissioner Stebbins moved to approve the Provisional License, subject to the conditions requested by Commissioners Stebbins and Roy.
- Commissioner Roy seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the Provisional License, subject to the conditions requested by Commissioner Stebbins and Roy.

f. MAIA Advanced Organics, Inc. (#MPN281960), Product Manufacturer

- The Chairman asked for questions or comments.
- Commissioner Roy moved to approve the Provisional License, subject to the conditions requested by Commissioners Stebbins and Roy.
- Commissioner Concepcion seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the Provisional License, subject to the conditions requested by Commissioners Stebbins and Roy.



g. Mass Cannabis Growers Cooperative (#CON281452), Craft Marijuana Cooperative, Tier 3
/ Indoor

- Licensing Manager Defoe presented the Staff Recommendation for Provisional License.
- The Chairman asked for questions or comments.
- Commissioner Camargo requested a condition.
 - Proposed Condition: Prior to final license applicant to clarify what the “Membership Lottery” means as part of their Positive Impact Plan.
- Commissioner Roy requested a condition.
 - Proposed condition: Prior to Final application for Licensure, please update Diversity and Inclusion plan under the program section to also include veterans publications/ job sites and other veteran outreach strategies when advertising employment opportunities.
- Commissioner Stebbins commended this applicant, and its Diversity Plan included a goal to buy goods and services from a diverse group of vendors and noted how that goal is supported by individuals joining the ancillary track of the Social Equity Program.
- Commissioner Concepcion moved to approve the Provisional License, subject to the conditions requested by Commissioners Camargo and Roy.
- Commissioner Camargo seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the Provisional License, subject to the conditions requested by Commissioners Camargo and Roy.

h. Misty Mountain Shop, LLC (#MRN282634), Retail

- Licensing Manager Defoe presented the Staff Recommendation for Provisional License.
- The Chairman asked for questions or comments.
- Commissioner Roy requested two conditions.
 - Proposed conditions:
 - Prior to Final application for Licensure, the applicant shall ensure compliance with 935 CMR 500.050(7)(c), namely, not providing direct or indirect compensation to Independent Testing Laboratories, in the execution of its Plan to Positively Impact Disproportionately Harmed People as a condition of licensure.
 - Consumer Education Compliance condition: Prior to final licensure, and upon receiving a commence operations notice, the applicant shall ensure full compliance with all consumer education material requirements



applicable to its license type in accordance with 935 CMR 500.140(6)(a)-(j)

- Commissioner Stebbins requested a condition.
 - Proposed condition: Prior to Final Application for Licensure, review diversity hiring goals and projected number of employees and provide any updates.
- Commissioner Camargo moved to approve the Provisional License, subject to the conditions requested by Commissioner Stebbins and Roy.
- Commissioner Stebbins seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the Provisional License, subject to the conditions requested by Commissioner Stebbins and Roy.

i. Neamat, LLC (#MPN282004), Product Manufacturer

- Licensing Manager Defoe presented the Staff Recommendation for Provisional License.
- The Chairman asked for questions or comments.
- Commissioner Concepcion requested a condition.
 - Proposed condition: Provide greater detail on who the positive impact plan is intended to benefit and how selected clean-up locations will impact the specified cohort.
- Commissioner Stebbins moved to approve the Provisional License, subject to the condition requested by Commissioner Concepcion.
- Commissioner Roy seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the Provisional License, subject to the condition requested by Commissioner Concepcion.

j. North Country Production, LLC (#MCN283161), Cultivation, Tier 6 / Indoor

- Licensing Manager Defoe presented the Staff Recommendation for Provisional License.
- The Chairman asked for questions or comments.
- Commissioner Concepcion commented that with respect to the Security Plan, which included a letter from the Holyoke of the Chief of Police noting that North Country had



submitted its security plan and sought approval. Commissioner Concepcion wanted to commend North Country for taking those extra steps.

- Commissioner Roy requested a condition, commenting that the Positive Impact Plan includes support for Holyoke Community College, and noted how Community Colleges in the Commonwealth are largely located in Areas of Disproportionate Impact and incredible resources to the public of the Commonwealth.
 - Proposed condition: Prior to Final application for Licensure, please update Diversity Plan under programs section, namely sub-section one to also include veterans in aforementioned notices.
- Commissioner Roy moved to approve the Provisional License, subject to the condition requested by Commissioner Roy.
- Commissioner Concepcion seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the Provisional License, subject to the condition requested by Commissioner Roy.

k. Pepperell Roots, LLC (#MCN283252), Cultivation, Tier 1 / Indoor

- Licensing Manager Defoe presented the Staff Recommendation for the two colocated Pepperell Roots, LLC Provisional Licenses.
- The Chairman asked for questions or comments.
- Commissioner Stebbins requested two conditions to apply to all three Pepperell Roots, LLC licenses.
 - Proposed conditions:
 - Prior to Final Application for Licensure, provide clarification to CCC Licensing staff whether Positive Impact Plan educational sessions require an admittance fee and if educational sessions are related to recruiting potential employees.
 - Prior to Final Application for Licensure, review Positive Impact Plan and any strategy for outreach to residents of nearby Disproportionate Impact designated community of Lowell for employment and provide any update.
- Commissioner Concepcion moved to approve the Provisional License, subject to the conditions requested by Commissioner Stebbins.
- Commissioner Camargo seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes



- Chairman Hoffman – Yes
- The Commission unanimously approved the Provisional License, subject to the conditions requested by commissioner Stebbins.

l. Pepperell Roots, LLC (#MPN282002), Product Manufacturer

- The Chairman asked for questions or comments.
- Commissioner Camargo moved to approve the Provisional License, subject to the conditions requested by Commissioner Stebbins.
- Commissioner Stebbins seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the Provisional License, subject to the conditions requested by commissioner Stebbins.

m. Pepperell Roots, LLC (#MCN283254), Cultivation, Tier 6 / Indoor

- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
- The Chairman asked for questions or comments.
- Commissioner Stebbins moved to approve the Provisional License, subject to the conditions requested by Commissioner Stebbins.
- Commissioner Roy seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the Provisional License, subject to the conditions requested by commissioner Stebbins.

n. Spencer House, LLC (#MRN284143), Retail

- Licensing Manager Defoe presented the Staff Recommendation for Provisional License.
- The Chairman asked for questions or comments.
- Commissioner Concepcion requested a condition.
 - Proposed condition: Prior to final licensure, applicant must amend its security plan to state that the appropriate Law Enforcement Authorities and the Commission shall be notified of any breach of security or other reportable incident defined in 500.110(9).



- Commissioner Stebbins requested two conditions.
 - Proposed conditions:
 - Prior to Final Application for Licensure, contact CCC Licensing Division for an update to confirm your training and recruitment partners eligibility to support your activities.
 - Prior to Final Application for Licensure, review diversity hiring goals and projected number of employees and provide any updates.
 - Commissioner Roy moved to approve the Provisional License, subject to the conditions requested by Commissioners Concepcion and Stebbins.
 - Commissioner Concepcion seconded the motion.
 - The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
 - The Commission unanimously approved the Provisional License, subject to the conditions requested by Commissioners Concepcion and Stebbins.
- o. Sugar Grove, LLC (#MCN283194), Cultivation, Tier 2 / Indoor
- Licensing Manager Defoe presented the Staff Recommendation for both Sugar Cove, LLC Provisional Licenses, subject to separate votes.
 - The Chairman asked for questions or comments.
 - Commissioner Stebbins requested a condition to apply to both licenses.
 - Proposed condition: Prior to Final Application for Licensure, review Positive Impact Plan and any strategy for outreach to residents of nearby Disproportionate Impact designated community of Fitchburg for employment and provide any updates.
 - Commissioner Concepcion moved to approve the Provisional License, subject to the condition requested by Commissioner Stebbins.
 - Commissioner Camargo seconded the motion.
 - The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
 - The Commission unanimously approved the Provisional License, subject to the conditions requested by Commissioner Stebbins.
- p. Sugar Grove, LLC (#MPN282044), Product Manufacturer
- The Chairman asked for questions or comments.



- Commissioner Camargo moved to approve the Provisional License, subject to the condition requested by Commissioner Stebbins.
- Commissioner Stebbins seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the Provisional License, subject to the conditions requested by Commissioner Stebbins.

q. The Heritage Club, LLC (#MRN282762), Retail

- Licensing Manager Defoe presented the Staff Recommendation for Provisional License.
- The Chairman asked for questions or comments.
- Commissioner Roy requested a condition, commenting that this applicant’s demonstrated generosity in their Positive Impact Plan.
 - Requested condition: Prior to Final application for Licensure, please update Diversity and Inclusion plan namely under “advertise all job postings section” to also include veterans publications/ job sites and other veteran outreach strategies when advertising employment opportunities.
- Commissioner Camargo echoed Commissioner Roy’s comments and commended the applicant for its focus on supporting its local community.
- Commissioner Stebbins moved to approve the Provisional License, subject to the condition requested by Commissioner Roy.
- Commissioner Roy seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the Provisional License, subject to the condition requested by Commissioner Roy.

r. Verdant Reparative, Inc. (#MPN282085), Product Manufacturer

- Licensing Manager Defoe presented the Staff Recommendation for both Verdant Reparative, Inc. Provisional Licenses, subject to separate votes.
- The Chairman asked for questions or comments.
- Commissioner Stebbins requested a condition to apply only to the Product Manufacturer license.



- Prior to Final Application for Licensure for Production, identify any hiring goals for women, minorities, veterans, individuals with disabilities and LGBTQ residents.
 - Commissioner Roy moved to approve the Provisional License, subject to the condition requested by Commissioner Stebbins.
 - Commissioner Concepcion seconded the motion.
 - The Chairman took a roll call vote:
 - Commissioner Camargo – Recused
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
 - The Commission approved the Provisional License by a vote of four in favor and one refusal, subject to the condition requested by Commissioner Stebbins.
- s. Verdant Reparative, Inc. (#MRN282752), Retail
- The Chairman asked for questions or comments.
 - Commissioner Concepcion moved to approve the Provisional License.
 - Commissioner Stebbins seconded the motion.
 - The Chairman took a roll call vote:
 - Commissioner Camargo – Recused
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
 - The Commission approved the Provisional License by a vote of four in favor and one refusal.
- t. Zip Run, Inc. (#DOA100102), Marijuana Courier
- Licensing Manager Defoe presented the Staff Recommendation for Provisional License.
 - The Chairman asked for questions or comments.
 - Commissioner Stebbins moved to approve the Provisional License
 - Commissioner Roy seconded the motion.
 - The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
 - The Commission unanimously approved the Provisional License.



u. Alchemy League (#RMDA3481), Vertically Integrated Medical Marijuana Treatment Center

- Licensing Manager Defoe presented the Staff Recommendation for Provisional License.
- The Chairman asked for questions or comments.
- Commissioner Roy moved to approve the Provisional License
- Commissioner Concepcion seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the Provisional License.
- Commissioner Stebbins clarified that the second vote with respect to Sugar Grove LLC was for MPN282044 rather than MCN283194.

The Commission took a break until 12:45 P.M (2:44:41).

9) Commission Discussion and Votes

a. Timeline for Executive Director Performance Review Process

- Commissioner Stebbins gave an overview of his memorandum regarding Schedule for Review and Approval of Executive Director's Performance Goals.
- Commissioner Stebbins moved to approve the schedule as outlined in the memorandum regarding Schedule for Review and Approval of Executive Director's Performance Goals.
- Commissioner Roy seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the motion.

b. Possible Extension of COVID-19 Administrative Actions

- The Executive Director gave an overview of the topic.
- The Chairman noted that he usually reserves his comments until other Commissioners have had the chance to speak, but in this instance, he would take the liberty to make a comment at the start. The Chairman said that there are two issues on the table from his perspective, first, the merits of the policy and second the process of changing the



policy. The Chairman noted that as a matter of process, he is strongly opposed to the process in this instance. The Chairman noted that over the past four years, the Commission has drafted and amended its regulations through a thorough deliberative process. He recognized that new Commissioners may see areas for improvement in the regulations as well, which the Chairman noted was the desired outcome of rotating Commissioners. The Chairman said he believes changes to the regulations should be made through the statutorily established regulatory change process, which includes staff work, Commission discussion and vote on proposed changes to the regulations, hearings, public comment, and final draft regulations. The Chairman said that, as painful and time consuming as amending the regulations can be, waivers are intended to be done in a one-off manner to address a unique hardship by suggesting an alternative that still satisfies the spirit of the regulations, rather than addressing changes of general applicability. The Chairman expressed his concern that this could create a precedent to change the regulations by way of a waiver, rather than the appropriate Administrative Procedure Act process.

- Commissioner Roy said that she largely agrees with the Chairman's analysis but stated that she is comfortable moving forward in this way because of concerns about rising Delta variant rates and because the order creates a temporary change to the regulations, rather than a permanent one, and therefore, believes it is appropriate in this context.
- The Chairman clarified that Commissioner Roy's perspective pertains to the telehealth waiver or whether it also applies to curbside sales as well.
 - Commissioner Roy said that her perspective applies to curbside sales as pertains to medical.
- Commissioner Camargo echoed Commissioner Roy's statements and recommended revisiting the topic early in the new calendar year.
- Commissioner Stebbins asked the Executive Director with respect to how the waiver request process would work, especially given the number of certifying healthcare providers and asked what the timeline might be for approving waivers. Commissioner Stebbins also asked whether there might be a scenario in which one waiver might be approved and another not being denied.
 - The Executive Director said that he believes it would only take a few days to consider waivers. The Executive Director noted that notice would be sent to anyone who previously requested and was granted a waiver in this regard. The Executive Director said that likely no one would be denied, but there may be additional information if the request was incomplete. The Executive Director also clarified that the requirement that healthcare providers establish a bona fide relationship with patients is not being waived.
 - Deputy General Counsel Pauline Nguyen said that the process is relatively streamlined. The Deputy General Counsel noted that the ongoing nature of the pandemic is the essential basis for a waiver.
- Commissioner Concepcion wanted to highlight a distinction between the two actions in the orders, noting that curbside sales align with what is in the regulations. With respect to telehealth, however, it is a variation from the regulations. Commissioner Concepcion noted that it is helpful to know that other agencies have allowed telehealth.



- Commissioner Roy suggested establishing an affirmative date to review the order.
- Commissioner Camargo recommended the January meeting for that review date, which would allow for the collection and consideration of data.
- The Chairman commented that, though he will vote no, he wants to be clear that his vote is based on concerns about process, and not the merits of the matters. He expressed that he believes this process sets a concerning precedent, but he is not opposed to telehealth or curbside.
- Commissioner Concepcion moved, relying on its authority under G. L. c. 94G, § 4 (a), c. 94I, and the associated regulations, and in recognition of the continuing risks posed by COVID-19, that the Commission extend the availability of medical curbside operations and the telehealth waiver process. Consistent with its prior delegation of authority the Commission directs the Executive Director, and his delegees, to take all necessary steps to reissue the following:
 1. The Final Administrative Order Allowing Curbside Operations, which would allow Medical Marijuana Treatment Centers (MTCs) only to conduct curbside transfers for the sale of medical-use marijuana or marijuana products; and
 2. The Bulletin on Telehealth Consultations for Patients, which would allow Certifying Healthcare Providers to submit a new waiver request under 935 Code Mass Regs. § 501.850 (2), specifically, a waiver of the requirement under 935 Code Mass Regs. § 501.002, that the provider conducts an in-person visit for the initial patient certification.

Both of these administrative orders and the delegations of authority to the Executive Director will be reviewed at the Commission's January 2022 meeting.

- Commissioner Camargo seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – No
- The Commission approved the motion by a vote of four in favor and one against.

c. Job Description: Director of Testing

- The Executive Director gave an overview of the topic and job description.
- Commissioner Camargo expressed her view that this role is needed and important to the maturation of the industry.
- The Chairman confirmed that this job description was accounted for in the budget.
- Commissioner Camargo moved to approve the job description.
- Commissioner Stebbins seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes



- Commissioner Stebbins – Yes
- Chairman Hoffman – Yes
- The Commission unanimously approved the job description.

d. Responsible Vendor Training Applicants

- Research Project Coordinator Olivia Laramie gave an overview of the topic and each applicant.
- The Chairman noted that all three applications will be considered as a roster.
- i. Train to Tend
- ii. ELearn Cannabis Academy
- iii. Willow Street Legal, LLC
- The Chairman asked for questions or comments.
- Commissioner Concepcion requested a condition.
- Commissioner Roy confirmed that these would be added to the existing roster of RVT Trainers, rather than replacing some.
- Commissioner Camargo noted that this is another method of entry into the cannabis industry, and perhaps could be an avenue for Social Equity Program participants in the Ancillary Track.
- Commissioner Stebbins moved to approve the roster of Responsible Vendor Training applications.
- Commissioner Roy seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously approved the roster of Responsible Vendor Training.

10) New Business the Chair Did Not Anticipate at the Time of Posting – 03:26:16

a. Discussion on adding Lawrence to the current Area of Disproportionate Impact list

- The Chairman introduced the topic.
- Commissioner Camargo thanked the Chairman for the opportunity to address her fellow Commissioners, staff, and the public. Commissioner Camargo acknowledged, as the Chairman did, that the matter about to be discussed by the Commission was not on the agenda. Commissioner Camargo said she did not want to compromise process or disregard the work of Commission staff and community members already ongoing with respect to the second report regarding Areas of Disproportionate Impact. Commissioner Camargo said she would like her fellow Commissioners to just think about this as a critical and urgent exception to the overall process. Commissioner Camargo referred to a recent memo she sent raising her concerns around the omission of the City of



Lawrence from both the first Disproportionate Impact Area study in 2018 and the most recent study released in March of this year, on which the Commission has not yet voted. Commissioner Camargo said that in the interest of justice, she hoped her fellow Commissioners also understand the sense of urgency with adding the City of Lawrence to the Commission's current list of 29 cities and towns designated as Area of Disproportionate Impact. Commissioner Camargo recognized that her colleagues may be asking, "*Commissioner Camargo, why Lawrence and why now?*" Commissioner Camargo said she can explain why Lawrence and why now. Commissioner Camargo said she knows better now, and, after 9 months in this role, regulating a 2-billion-dollar industry for the first state in the country to mandate equity and inclusion to those disproportionately harmed by the war on drugs, that the data is telling us a story, a story that the Commission may not be able to go back and rewrite. Commissioner Camargo said that in light of the Commission's Social Equity Program application extension, for which she thanks the Executive Director, the omission of the City of Lawrence from being designated an Area of Disproportionate Impact for the past four years has created inequalities in the Commission's programming and mission. Therefore, Commissioner Camargo said it is imperative that the Commission make an exception to the overall process before it is too late for one of the communities most disproportionately harmed by the war on drugs in Massachusetts. Commissioner Camargo said that she honestly thinks everyone on the Commission agrees that Lawrence would fall in the top tier of any list and therefore should have been on the list designating Areas of Disproportionate Impact. Commissioner Camargo noted that the Social Equity Program's Latinx enrollment does not represent the disproportionate impact that the War on Drugs has had on the Lawrence community. Commissioner Camargo noted that, while the Commonwealth's Latinx community represents 12% of the state's population, only 11% of Cohort One identified as Latinx, with a modest increase in Cohort Two with 20% of the enrollment identifying as Latinx. Commissioner Camargo also noted the following facts about Lawrence:

- Lawrence poverty rate is 24.2% (1 out of every 4 residents lives in poverty).
- Lawrence is 82% Latinx with a median income of \$44,618.
- Lawrence ranks 9th in cities that release the most inmates back into their community and, like many, they have been disproportionately impact by the War on Drugs. From January to May of this year the Essex County daily inmate count ranked highest. Data will show Lawrence as one of the leading contributing towns when it comes those numbers.
- Lawrence has historically been disfranchised, from school receivership in 2011 until recently, to its poverty levels, over policing, and even negative comments from elected officials from a neighboring state – creating a narrative that continues to disenfranchise the Lawrence community.

Commissioner Camargo asked her fellow Commissioners whether they can really think of a community like Lawrence that has been disproportionately impacted by the War on Drugs and can continue to leave it behind, creating more barriers for access, employment, resources, and a chance to create generational wealth. Commissioner Camargo said the fact that the City of Lawrence was not identified as an Area of



Disproportionate Impact in twice in four years, for whatever reason, is unacceptable. Commissioner Camargo said she believes everything the former Commissioners, including the Chairman and the Executive Director, have created was in the spirit of the Commission's mission, including the development of the regulations, hiring practices, the Economic Empowerment Applicant, the Social Equity Program, priority inspections and waivers, etc. Commissioner Camargo said, however, that notwithstanding those efforts, Lawrence has been missing in action, which is why she is raising this issue now. Commissioner Camargo reiterated that the answer to "why Lawrence why Now" is that it is in the interest of justice. Commissioner Camargo expressed her hope that her fellow Commissioners also understand the sense of urgency with adding the City of Lawrence to the Commission's current list of the 29 cities and towns.

- Commissioner Stebbins thanked Commissioner Camargo and the Chairman for putting this important topic before the Commission. Commissioner Stebbins spoke with Director of Equity Programming and Community Outreach Sibley about the opportunities to accomplish the Commission's statutory mandate. Commissioner Stebbins noted that in the most recent Disproportionate Impact Study was missing with respect to Lawrence, researchers stated that data indices suggest Lawrence would most likely be included in the list of communities. Commissioner Stebbins noted the data presented at each meeting shows the lack of diversity in ownership in the industry as well as in the demographic makeup of Registered Agents. Commissioner Stebbins also noted that, without an established time frame for Cohort 4 of the Social Equity Program, waiting for cohort 4 would leave a lot of people out of the benefits of that program. In light of the extension of the Social Equity Program, there is an opportunity to include Lawrence residents as part of cohort 3. Commissioner Stebbins suggested that an approval of this designation today should come with the condition that the city of Lawrence officially request that designation.
- Commissioner Camargo thanked Commissioner Stebbins for his comment and added that she has received a lot of communication from community members, residents, organizations, and leaders, all advocating for the designation of Lawrence as an Area of Disproportionate Impact.
- Commissioner Roy thanked Commissioner Camargo for her commitment to the topic. Commissioner Roy said that Commissioners agree that Lawrence should be added to the list of Areas of Disproportionate Impact but expressed concerns about process. Commissioner Roy noted that there may be other communities that would be designated as Areas of Disproportionate Impact as a result of the recent study, and therefore, would respectfully ask for this discussion to be postponed until the next meeting.
- Commissioner Concepcion thanked Commissioner Camargo. Commissioner Concepcion asked questions about the parameters of the current request and some more information about Lawrence in comparison to the other municipalities that Commissioner Roy mentioned.
- Commissioner Camargo said that it is well recognized that Lawrence should have been included in the original list, and so is asking that Lawrence be included in the list now, to allow for Social Equity eligibility, and contributions through Positive Impact Plans.



Commissioner Camargo noted that there are other towns and cities still being analyzed by UMass, but Lawrence's exclusion previously and at this time creates a disparity that creates a unique moment and sense of urgency compared to other municipalities, which may or may not ultimately end up on the list, but Lawrence, by all measures, should definitely be on the list. Commissioner Camargo recognized that this request is a deviation from the process. Commissioner Camargo noted she is not seeking to change or stop the ongoing process to otherwise identify other municipalities as Area Disproportionate Impact but noted that that process could go on for some time, and in that time, one of the largest cities in the Commonwealth is being further disproportionately impacted.

- Commissioner Concepcion noted that she previously asked for a robust process for destination Areas of Disproportionate impact and asked Commissioner Camargo to describe the exigent circumstances that necessitates Lawrence to be considered outside that process. Commissioner Concepcion noted that there may be areas of Boston, for example, that should be designated as an Area of Disproportionate Impact.
- Commissioner Camargo recognized that much of Boston has already been designated an Area of Disproportionate Impact, largely because of outreach by the Commission to the city for arrest data. Commissioner Camargo said the urgency is created by the time it will take to complete the robust process discussed, and by the time that process is complete, the opportunity for folks to benefit from that designation continues to disenfranchise Lawrence residents. Commissioner Camargo reiterated that by all data indices available, Lawrence should have been included initially but for a lack of arrest data being reported to a given database. Commissioner Camargo noted that some additional outreach by the Commission to Lawrence might have resolved that issue, but in the meantime, Lawrence is not getting any piece of the pie, whereas Boston and other communities are at least getting some of the pie.
- Commissioner Roy asked Commissioner Camargo if she had the opportunity request from Lawrence the data needed to confirm this designation.
- Commissioner Camargo said that she has not been able to confirm that Lawrence would give the data, but noted that if the Commission officially reached out, as it had with respect to Boston, it may be open to providing the data.
- The Chairman noted that based on his recollection, the Commission had reached out to Lawrence for data when it reached out to Boston.
- Commissioner Roy noted that Lawrence has prohibited cannabis businesses in its jurisdiction, so this would allow for the residency requirement for Social Equity Program, but she is concerned with recognizing Lawrence when other municipalities, under the recent study, scored high in the indices for inclusion on the list of Areas of Disproportionate Impact.
- Commissioner Camargo clarified that Lawrence should have been included initially as a result of the first study, as well as the second study, whereas other municipalities would be added simply as a result of the second study, so making this exception with respect to Lawrence is a little different than the other municipalities.
- The Executive Director noted that staff members are working to assess the study and developing a recommendation for the Commission. The Executive Director said he



could not give a definite deadline for that recommendation but anticipates it will bleed into the new year. The Executive Director defended the study, noting that going into the second report, it was known that Boston data was missing, and it was discovered during the second phase of the report that Lawrence data was missing.

- Commissioner Camargo recognized the Executive Director's comments but noted that additional outreach could have been done and creativity could have been exercised to address the shortcomings in the study.
- Commissioner Concepcion echoed a distinction Commissioner Camargo made that Lawrence was left out of both iterations of the study because of lack of data, which is indicative of inequity itself, whereas other municipalities that might be included as a result of the second study because the data was available, and that is a persuasive consideration. Commissioner Concepcion therefore suggested limiting the effect of the decision any vote today to recognizing Lawrence as an Area of Disproportionate Impact to eligibility for the Social Equity Program until further study can be completed with respect to Lawrence and other municipalities.
- Commissioner Camargo acknowledged that this is a deviation from the planned process but her viewpoint with respect to the urgency involved. Commissioner Camargo said she welcomed Commissioner Concepcion's suggestion.
- Commissioner Roy recommended that the topic be postponed until the next meeting and make an appeal to the City of Lawrence for the data, in order to consider it then, with the ultimate goal of adding Lawrence as an Area of Disproportionate Impact.
- Commissioner Stebbins asked that if there is a postponement of the question, that it not limit staff's ability to do aggressive outreach in communities like Lawrence to participate in the cohort 4 of the social Equity Program.
- Commissioner Roy moved to postpone to the next meeting the question of designating the City of Lawrence as an Area of Disproportionate Impact, to appeal to the City of Lawrence to provide enforcement data in order to designate the City of Lawrence as an Area of Disproportionate Impact, which would allow residents of Lawrence one month to apply for the Social Equity Program after such designation and to robustly enhance community outreach to residents of the City of Lawrence and other identified areas, with the ultimate goal of designating the City of Lawrence as an Area of Disproportionate impact.
- Commissioner Camargo seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – No
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission approved the motion by a vote of four in favor and one opposed.
- Commissioner Concepcion wanted to reiterate for the public that the new deadline for cohort 4 of the Social Equity Program begins on November 15.
- Commissioner Camargo thanked all the Commissioners for the discussion and insights.



- The Chairman thanked Commissioner Camargo for her leadership on this topic and her graciousness in postponing the question.
- Commissioner Roy also thanked Commissioner Camargo for her leadership on the topic.

11) Next Meeting Date

- The Next meeting date will be October 14, 2020, at 10 A.M

12) Adjournment

- Commissioner Stebbins moved to adjourn the meeting.
- Commissioner Camargo seconded the motion.
- The Chairman took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chairman Hoffman – Yes
- The Commission unanimously voted to adjourn the meeting.



Higher Purpose Corporation 0121-COO-01-0821

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Higher Purpose Corporation

License Number	License Type
MC281756	Cultivation
MP281514	Product Manufacturing

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

3. The licensee is proposing to add the following as Persons Having Direct or Indirect Control:

Individual	Role
Migdeliz Girard	Person with Direct or Indirect Control

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

5. The proposed parties do not appear to have exceeded any ownership or control limits over any license type.

RECOMMENDATION

Commission staff recommend review and decision on the request for change of ownership and control, and if approved, request that the approval be subject to the following conditions:

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.

COO Executive Summary 1



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.



J-B.A.M., Inc.
0119-COO-01-0821

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

J-B.A.M., Inc.

License Number	License Type
MC282510	Cultivation

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

3. The licensee is proposing to add the following as Persons Having Direct or Indirect Control:

Individual	Role
Anthony Palazzi	Person with Direct or Indirect Control

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

5. The proposed parties do not appear to have exceeded any ownership or control limits over any license type.

RECOMMENDATION

Commission staff recommend review and decision on the request for change of ownership and control, and if approved, request that the approval be subject to the following conditions:

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.

COO Executive Summary 1



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.



Tree Market Lynn, LLC
0135-COO-03-0721

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Tree Market Lynn, LLC

License Number	License Type
MR282587	Retail

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

3. The licensee is proposing to add the following as Persons Having Direct or Indirect Control:

Individual	Role
Rhett Jordan	Person with Direct or Indirect Control
David Lahar	Person with Direct or Indirect Control
Joseph Villatico	Person with Direct or Indirect Control

4. The licensee is proposing to add the following as Entities Having Direct or Indirect Control:

Entity	Role
DMA Holdings, LLC	Entity with Direct or Indirect Control
JVMB Enterprises, LLC	Entity with Direct or Indirect Control
Convergon, LLC	Entity with Direct or Indirect Control
RJ Mass, LLC	Entity with Direct or Indirect Control

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

6. The proposed parties do not appear to have exceeded any ownership or control limits over any license type.



7. 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.

RECOMMENDATION

Commission staff recommend review and decision on the request for change of ownership and control, and if approved, request that the approval be subject to the following conditions:

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.



Tree Market Taunton, LLC 0136-COO-03-0721

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Tree Market Taunton, LLC

License Number	License Type
MR281597	Retail

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

3. The licensee is proposing to add the following as Persons Having Direct or Indirect Control:

Individual	Role
Rhett Jordan	Person with Direct or Indirect Control
David Lahar	Person with Direct or Indirect Control
Joseph Villatico	Person with Direct or Indirect Control

4. The licensee is proposing to add the following as Entities Having Direct or Indirect Control:

Entity	Role
DMA Holdings, LLC	Entity with Direct or Indirect Control
JVMB Enterprises, LLC	Entity with Direct or Indirect Control
Convergon, LLC	Entity with Direct or Indirect Control
RJ Mass, LLC	Entity with Direct or Indirect Control

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

6. The proposed parties do not appear to have exceeded any ownership or control limits over any license type.



7. 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.

RECOMMENDATION

Commission staff recommend review and decision on the request for change of ownership and control, and if approved, request that the approval be subject to the following conditions:

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.



Van Garden Cannabis, LLC fka CannAssist, LLC
0131-COO-03-0621

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Van Garden Cannabis, LLC f/k/a CannAssist, LLC

License Number	License Type
MC281487	Cultivation
MP281365	Product Manufacturing

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

3. The licensee is proposing to add the following as Persons Having Direct or Indirect Control:

Individual	Role
Nicholas Johnson	Person with Direct or Indirect Control
Michael Cancelleri	Person with Direct or Indirect Control
Jeffrey Berman	Person with Direct or Indirect Control

4. The licensee is proposing to add the following as Entities Having Direct or Indirect Control:

Entity	Role
Attis HoldCo LLC	Entity with Direct or Indirect Control
Attis Finance LLC	Entity with Direct or Indirect Control
AAShex, LLC	Entity with Direct or Indirect Control

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

6. The proposed parties do not appear to have exceeded any ownership or control limits over any license type.



7. 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.

RECOMMENDATION

Commission staff recommend review and decision on the request for change of ownership and control, and if approved, request that the approval be subject to the following conditions:

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.



MARIJUANA ESTABLISHMENT RENEWALS

EXECUTIVE SUMMARY

COMMISSION MEETING: OCTOBER 14, 2021

RENEWAL OVERVIEW

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

Marijuana Establishment Name	License Number	Renewal Application Number	Location	Funds
617 Therapeutic Health Center, Inc.	MC282414	MCR140031	Millis	\$25,000.00
BKPN LLC	MR282853	MRR205850	Dracut	\$0.00
Buddies Ice Cream, Inc.	MB281755	MBR169274	Holyoke	\$0.00
Canna Provisions Inc.	MC281970	MCR140091	Sheffield	\$0.00
Canna Provisions Inc.	MC282476	MCR140093	Holyoke	\$0.00
Central Ave Compassionate Care, Inc.	MC281505	MCR140068	Ayer	\$20,350.00
Central Ave Compassionate Care, Inc.	MP281399	MPR243667	Ayer	\$20,350.00
Coastal Cultivars, LLC	MC282052	MCR140040	Wareham	\$50,000.00
Curaleaf Massachusetts, Inc.	MR281263	MRR205868	Oxford	\$222,925.22
Curaleaf Massachusetts, Inc.	MC281309	MCR140076	Webster	\$150,000.00
Curaleaf Massachusetts, Inc.	MP281318	MPR243677	Webster	\$150,000.00
Deerfield Naturals, Inc.	MC281426	MCR140087	Deerfield	\$0.00
Deerfield Naturals, Inc.	MP281541	MPR243683	Deerfield	\$0.00
Deerfield Naturals, Inc.	MR281929	MRR205877	Deerfield	\$0.00
Four Score Holdings LLC	MC282187	MCR140084	Charlton	\$0.00
Four Score Holdings LLC	MP281689	MPR243681	Charlton	\$0.00
Four Score Holdings LLC	MR282757	MRR205874	Charlton	\$0.00
High Hopes	MR282161	MRR205856	Hopedale	\$0.00
Impressed LLC	MC282148	MCR140098	Hanson	\$0.00
KRD Growers, LLC	MP281683	MPR243668	Clinton	\$0.00
Liberty Market	MR281804	MRR205826	Lanesborough	\$0.00
Mass Wellspring LLC	MR281363	MRR205878	Maynard	\$26,000.00



Mill Town Agriculture, LLC	MC282596	MCR140102	Holyoke	\$0.00
ReLeaf Alternative Inc.	MR283153	MRR205881	Mansfield	\$0.00
The Blue Jay Botanicals, Inc.	MR282243	MRR205833	Athol	\$0.00
The Green Harbor Dispensary, LLC	MR281430	MRR205879	Provincetown	\$0.00
Theory Wellness Inc	MC281524	MCR140069	Bridgewater	\$225,000.00
Theory Wellness Inc	MP281424	MPR243669	Bridgewater	\$225,000.00
Theory Wellness Inc	MR281549	MRR205859	Great Barrington	\$3,561,149.72

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

RECOMMENDATION

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



MEDICAL MARIJUANA TREATMENT CENTER RENEWALS

EXECUTIVE SUMMARY

COMMISSION MEETING: OCTOBER 14, 2021

RENEWAL OVERVIEW

1. Name, license number, location(s), for each Medical Marijuana Treatment Center presented for renewal:

Medical Marijuana Treatment Center Name	License Number	Location (Cultivation & Processing)	Location (Dispensing)
ACK Natural, LLC	RMD-1627	Nantucket	Nantucket
Alternative Therapies Group, Inc.	RMD-1530	Salisbury	Amesbury
Apothca, Inc.	RMD-345	Fitchburg	Arlington
Bask, Inc.	RMD-445	Freetown	Fairhaven
Cultivate Leicester, Inc.	RMD-3193	Uxbridge	Framingham
HVV Massachusetts, Inc.	NA	Gloucester	Amherst
HVV Massachusetts, Inc.	RMD-1185	Gloucester	Gloucester
Life Essence, Inc.	NA	Holyoke	Cambridge
Life Essence, Inc.	NA	Holyoke	Holyoke
Life Essence, Inc.	RMD-1365	Holyoke	Northampton
Middlesex Integrative Medicine, Inc.	RMD-1025	Leominster	Norwood
Nature Medicines, LLC	RMD-1045	Uxbridge	Fall River
FFD Enterprises DBA Fine Fettle FKA PCMV	RMD-1165	West Tisbury	West Tisbury
Patriot Care Corp.	RMD-265	Lowell	Boston
Patriot Care Corp.	RMD-727	Lowell	Greenfield

MTC Renewal Executive Summary 1



The Green Harbor Dispensary, LLC	RMD-1305	Middleborough	Middleborough
The Heirloom Collective, Inc.	RMD-825	Bernardston	Hadley

2. All licensees have submitted renewal applications pursuant to 935 CMR 501.103.
3. All licensees have paid the appropriate annual license fee.
4. The licensees, when applicable, have been inspected over the previous year. Commission staff certify that, to the best of our knowledge, no information has been found that would prevent renewal of the licenses mentioned above pursuant to 935 CMR 501.450.

RECOMMENDATION

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



Ascend Mass, LLC
MR282837

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Ascend Mass, LLC
1089 Washington Street, Newton, MA 02465

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

Retail

3. The licensee is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

Type	Status	Location
Retail	Commence Operations	Boston

LICENSING OVERVIEW

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

INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): September 20, 2021.



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. 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;
- iii. Availability and contents of adult-use consumer education materials;

- d. Transportation

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

RECOMMENDATION



Commission staff recommend final licensure with the following conditions:

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

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

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



Commonwealth Alternative Care, Inc.

MR282339

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Commonwealth Alternative Care, Inc.
1090 West Chestnut Street, Brockton, MA 02301

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

Retail

3. The licensee is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

Type	Status	Location
Cultivation, Tier 11/Indoor (90,001-100,000 sq. ft.)	Provisional License	Taunton
Product Manufacturing	Provisional License	Taunton
Retail	Provisional License	Taunton
MTC	Commence Operations	Taunton-Taunton
MTC	Commence Operations	Taunton-Brockton
MTC	Provisional License	Taunton-Cambridge

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on August 12, 2021.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

Final License Executive Summary 1



INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): September 13, 2021.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. 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

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

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

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

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

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



Hidden Hemlock, LLC

MB281355

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Hidden Hemlock, LLC
109 Apremont Way, Unit 9, Westfield, MA 01085

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

Microbusiness (Cultivation and Product Manufacturing Operations)

3. The licensee is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type.

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on June 19, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): September 21, 2021.



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation

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

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

- d. Product Manufacturing Operation

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

- i. Proposed product compliance; and



- ii. Safety, sanitation, and security of the area and products.
- e. Transportation

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

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

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

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



Mellow Fellows, LLC

MR281811

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Mellow Fellows, LLC
d/b/a Mello
330 Amesbury Road, Haverhill, MA 01830

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

Retail

3. The licensee is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type.

LICENSING OVERVIEW

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

INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): September 21, 2021.



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. 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.

RECOMMENDATION



Commission staff recommend final licensure with the following conditions:

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

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

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



New England Treatment Access, LLC

MR283065

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

New England Treatment Access, LLC
162 Grove Street, Franklin, MA 02038

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

Retail

3. The licensee is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

Type	Status	Location
Retail	Commence Operations	Brookline
Cultivation, Tier 6/Indoor (40,001-50,000 sq. ft.)	Commence Operations	Franklin
Product Manufacturing	Commence Operations	Franklin
Retail	Commence Operations	Northampton
Research Facility	Application Submitted	Franklin
MTC	Commence Operations	Franklin-Brookline
MTC	Commence Operations	Franklin-Northampton
MTC	Provisional License	Franklin-Franklin

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on September 10, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).

Final License Executive Summary 1



7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): August 25, 2021.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. 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

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

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

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

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

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



QPS Massachusetts Holdings, Inc.

MC281517

MP281696

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

QPS Massachusetts Holdings, Inc.
105 Constitution Blvd., Franklin, MA 02038

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

Cultivation, Tier 3/Indoor (10,001 – 20,000 sq. ft.)
Product Manufacturing

3. The licensee is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type.

LICENSING OVERVIEW

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

INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): September 14, 2021 and September 23, 2021.

Final License Executive Summary 1



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation

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

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

- d. Product Manufacturing Operation

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

- i. Proposed product compliance; and



- ii. Safety, sanitation, and security of the area and products.
- e. Transportation

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

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

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

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



The Botanist, Inc.

MP281672

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

The Botanist, Inc.
1775 Lock Drive, Leominster, MA 01453

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

Product Manufacturing

3. The licensee is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

Type	Status	Location
Retail	Commence Operations	Worcester
Retail	Commence Operations	Shrewsbury
MTC	Commence Operations	Sterling-Shrewsbury
MTC	Commence Operations	Sterling-Worcester
MTC	Provisional License	Sterling-Leominster

LICENSING OVERVIEW

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

INSPECTION OVERVIEW

Final License Executive Summary 1



8. Commission staff inspected the licensee's facility on the following date(s): September 1, 2021.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. 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



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

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

1. The licensee may possess, 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.



Uma Flowers, LLC
MR283143

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Uma Flowers, LLC
2 Tarbell Street, Pepperell, MA 01463

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

Retail

3. The licensee is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type.

Please note that individuals associated with the proposed application(s) are also associated with another adult-use cultivation license under the name of Uma Cultivation, LLC.

LICENSING OVERVIEW

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

INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): August 31, 2021.

Final License Executive Summary 1



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. 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.

RECOMMENDATION



Commission staff recommend final licensure with the following conditions:

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

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

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



New England Treatment Access, LLC RMD3028

ESTABLISHMENT OVERVIEW

1. Name and address(es) of the Medical Marijuana Treatment Center:

New England Treatment Access, LLC

Cultivation: 5 Forge Parkway, Franklin, MA 02038*

Product Manufacturing: 5 Forge Parkway, Franklin, MA 02038*

Dispensary: 162 Grove Street, Franklin, MA 02038

*These identified locations have been previously approved to commence operations under separate MTC license(s).

2. The licensee is a licensee or applicant for other Medical Marijuana Treatment Center and/or Marijuana Establishment license(s):

Type	Status	Location
Retail	Commence Operations	Brookline
Cultivation, Tier 6/Indoor (40,001-50,000 sq. ft.)	Commence Operations	Franklin
Product Manufacturing	Commence Operations	Franklin
Retail	Commence Operations	Northampton
Retail	Provisional License	Franklin
Research Facility	Application Submitted	Franklin
MTC	Commence Operations	Franklin-Brookline
MTC	Commence Operations	Franklin-Northampton

LICENSING OVERVIEW

3. The licensee was approved for provisional licensure on September 10, 2020.
4. The licensee has paid all applicable license fees.
5. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license.

MTC Final License Executive Summary 1



6. No new information has been discovered by Commission staff regarding the suitability of the licensee(s) previously disclosed since the issuance of the provisional license.

INSPECTION OVERVIEW

7. Commission staff inspected the licensee's Medical Marijuana Treatment Center on the following date(s): August 25, 2021.
8. The licensee's Medical Marijuana Treatment Center was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 501.000, as applicable.
9. No evidence was discovered during the inspection(s) that indicated the Medical Marijuana Treatment Center was not in compliance with all applicable state and local bylaws or ordinances.
10. 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;
- iii. Availability and contents of patient education materials; and
- iv. Policies to ensure dispensing limits are followed.

d. Transportation

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

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

1. The licensee may cultivate, harvest, possess, prepare, produce, and otherwise acquire marijuana, but shall not dispense, sell, or otherwise transport marijuana to other Medical Marijuana Treatment Centers (except for locations that have been previously approved to commence operations under separate MTC license(s)), or to patients, 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. And
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 501.105(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.



617 Therapeutics Health Care, Inc.

MRN283963

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

617 Therapeutic Health Care, Inc.
144 Bowdoin Street, Boston, MA 02122

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Retail

The application was reopened four (4) times for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type.

Please note that individuals and/or entities associated with the proposed application(s) are also associated with other adult-use cultivation, product manufacturing, and retail licenses and medical marijuana treatment centers.

4. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Tsz Chung	Person Having Direct/Indirect Control
Richard Gin	Person Having Direct/Indirect Control
Kwong Chan	Person Having Direct/Indirect Control

5. List of all required entities and their roles in the Marijuana Establishment:

Entity	Role
617 Therapeutic Holding Company, LLC	Entity Having Direct/Indirect Control / Capital Contributor

Provisional License Executive Summary 1



Oasis Spring, LLC	Entity Having Direct/Indirect Control / Capital Contributor
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6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on December 2, 2020.
8. The applicant conducted a community outreach meeting on February 19, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on September 13, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	The Company aims to hire a minimum of 70% of its dispensary staff at the proposed location from candidates who fulfill one or more of the above criteria, and review annually its success in achieving this goal.
2	Help develop meaningful careers in the cannabis industry for all employees, by creating a mentorship program matched to each employee's particular areas of interest.

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 applicant states that it can be operational within Five (5) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:



Day(s)	Hours of Operation
Monday-Friday	8:00 a.m. to 8:00 p.m.
Saturday	10:00 a.m. to 6:00 p.m.
Sunday	12:00 p.m. to 6:00 p.m.

15. The 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.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Hire 49.6% women; 46.7% minorities; 0% veterans; 10% persons with disabilities; 10% persons who identify as LGBTQ+
2	Ensure that all (100%) of its employees receive training on diversity and sensitivity.

17. Plan for obtaining marijuana or marijuana products (if applicable):

The applicant plans to obtain marijuana from its affiliated licenses. If the need arises, the applicant will obtain marijuana or marijuana products by contracting with other licensed establishments.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications.
4. The applicant shall cooperate with and provide information to Commission staff.
5. Provisional licensure is subject to the payment of the appropriate license fee.

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



620 Industries, Inc.
MCN283511

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

620 Industries, Inc.
620 Beaulieu Street, Holyoke, MA 01040

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Cultivation, Tier 1/Indoor (up to 5,001 sq. ft.)

The application was reopened two (2) times for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type.

Please note that individuals associated with the proposed application(s) are also associated with a Marijuana Delivery Operator under the name of GreenGrab, Inc.

4. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Odaliz Breton	Person Having Direct/Indirect Control
John Muise	Close Associate

5. List of all required entities and their roles in the Marijuana Establishment:

No other entity appears to have ownership or control over this proposed Marijuana Establishment.

6. Applicant's priority status:



General Applicant

Expedited Applicant (Social Equity Program Participant)
(Odaliz Breton / 100% / SE304954)

7. The applicant and municipality executed a Host Community Agreement on April 12, 2021.
8. The applicant conducted a community outreach meeting on May 6, 2021 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality of Holyoke on August 17, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Host financial literacy programs at least two (2) times annually for Holyoke Youths.
2	Provide a low-interest loan or funding to at least one (1) Social Equity applicant through an investment vehicle tailored to the applicant's business circumstances.

BACKGROUND CHECK REVIEW

11. There were disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions. None of the disclosures raised suitability issues.
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 applicant states that it can be operational within seven (7) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Day(s)	Hours of Operation
Monday-Sunday	Open 24 hours



15. The 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.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Recruit 65% Minorities, 10% women, 15% veterans, 5% individuals who identify as LGBTQ+, and 5% individuals with disabilities.
2	Source 40% of all contracts to diverse vendors.

17. Summary of cultivation plan (if applicable):

The applicant submitted a cultivation plan that demonstrates the ability to comply with the Commission's regulations.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. The applicant shall cooperate with and provide information to Commission staff.
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



East Boston Local Roots, LLC

MRN284117

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

East Boston Local Roots, LLC
1006 Bennington Street, Boston, MA 02128

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Retail

The application was reopened one (1) time for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type.

4. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Nicole Modica	Person Having Direct/Indirect Control
Lorraine Curry	Person Having Direct/Indirect Control
Tracy Glissman	Person Having Direct/Indirect Control
James Schena	Person Having Direct/Indirect Control

5. List of all required entities and their roles in the Marijuana Establishment:

Entity	Role
East Bennington, LLC	Entity Having Direct/Indirect Control / Capital Contributor

6. Applicant's priority status:

Provisional License Executive Summary 1



General Applicant

7. The applicant and municipality executed a Host Community Agreement on March 12, 2021.
8. The applicant conducted a community outreach meeting on April 30, 2021 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality Boston on August 23, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Recruit at least 25% of its employees from target areas, and/or Massachusetts residents who have, or have parents or spouses who have past drug convictions.
2	Provide industry-specific educational programs and informational sessions geared towards individuals from the target areas and/or Massachusetts residents who have, or have parents or spouses who have, past drug convictions that are interested in the cannabis industry with specific focuses on marijuana retailers and entrepreneurship, at least twice year.

BACKGROUND CHECK REVIEW

11. There were 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 applicant states that it can be operational within one (1) year of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Day(s)	Hours of Operation
Monday-Sunday	9:00 a.m. to 8:00 p.m.

15. The 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.



16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Recruit people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, women, veterans, persons with disabilities, and LGBTQ+ for its hiring initiatives.
2	Offer 100% of the company's opportunities for advancement to management and executive positions internally, thereby providing opportunities to its diverse workforce, to the extent its workforce has been filled by diverse individuals, for advancement.

17. Plan for obtaining marijuana or marijuana products (if applicable):

The applicant will obtain marijuana or marijuana products by contracting with other licensed establishments.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. The applicant shall cooperate with and provide information to Commission staff.
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



Faded, LLC
MPN282090

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Faded, LLC
d/b/a Your Green Package
488 Stafford Street, Leicester, MA 01611

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Product Manufacturing

The application was reopened three (3) times for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

Type	Status	Location
Marijuana Courier	Commence Operations	Bellingham
Marijuana Delivery Operator Pre-Certification	Pre-Certified	N/A
Transporter with Other ME License	Application Submitted	Bellingham

4. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Christopher Fevry	Person Having Direct/Indirect Control
Lourdharry Pauyo	Person Having Direct/Indirect Control
John Muisse	Person Having Direct/Indirect Control

5. List of all required entities and their roles in the Marijuana Establishment:

Entity	Role
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Grow Global Investments, Inc.	Entity Having Direct/Indirect Control / Capital Contributor
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6. Applicant's priority status:

Expedited Applicant (Social Equity Program Participant)
(Lourdharry Pauyo / 51% / SE304880)

7. The applicant and municipality executed a Host Community Agreement on June 21, 2021.
8. The applicant conducted a community outreach meeting on July 8, 2021 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality of Leicester on September 21, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Increase financial literacy levels among young adults (21+) in the City of Brockton by hosting a financial literacy course once a year.
2	Recruit 30% of its workforce from areas of disproportionate impact, specifically, Brockton.

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 applicant states that it can be operational within five (5) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Day(s)	Hours of Operation
Monday-Sunday	5:00 a.m. to 11:30 p.m.



15. The 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.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Implement annual employee training on diversity and inclusion in the workplace.
2	Recruit 50% Minorities, 25% Women, 10% LGBTQ+, 10% Persons with disabilities, and 15% Veterans for its hiring initiatives.

17. Summary of products to be produced and/or sold (if applicable):

#	Product
1	Gummies (Green Apple, Strawberry, Blue Raspberry)
2	Cookies (Chocolate Chip, Smores, Snickerdoodle)
3	Tea (Mango, Lemon Ginger, Honey Green Tea)
4	Coffee (Hazelnut Haze, Black, Matcha Latte)

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. Final licensure is subject to the applicant providing Commission staff, upon inspection, with a detailed list of all proposed products to be produced with specific information as to types, forms, shapes, colors, and flavors.
4. The applicant shall cooperate with and provide information to Commission staff.
5. Provisional licensure is subject to the payment of the appropriate license fee.

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



Faded, LLC
MXN281395

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Faded, LLC
d/b/a Your Green Package
190 Farm Street, Suite B, Bellingham, MA 02109

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Transporter with Other ME License

The application was reopened two (2) times for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

Type	Status	Location
Marijuana Courier	Commence Operations	Bellingham
Marijuana Delivery Operator Pre-Certification	Pre-Certified	N/A
Product Manufacturing	Application Submitted	Leicester

4. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Christopher Fevry	Person Having Direct/Indirect Control
Lourdharry Pauyo	Person Having Direct/Indirect Control
John Muise	Person Having Direct/Indirect Control

5. List of all required entities and their roles in the Marijuana Establishment:

Entity	Role
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Grow Global Investments, Inc.	Entity Having Direct/Indirect Control / Capital Contributor
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6. Applicant's priority status:

Expedited Applicant (Social Equity Program Participant)
(Lourdharry Pauyo / 51% / SE304880)

7. The applicant and municipality executed a Host Community Agreement on December 22, 2020.
8. The applicant conducted a community outreach meeting on July 7, 2021 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality of Bellingham on September 23, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Increase financial literacy levels among young adults (21+) in the City of Brockton by hosting a financial literacy course once a year.
2	Recruit 30% of its workforce from areas of disproportionate impact, specifically, Brockton.

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 applicant states that it can be operational within three (3) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Day(s)	Hours of Operation
Monday-Sunday	8:00 a.m. to 7:00 p.m.

Provisional License Executive Summary 2



15. The 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.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Implement annual employee training on diversity and inclusion in the workplace.
2	Recruit 50% Minorities, 25% Women, 10% LGBTQ+, 10% Persons with disabilities, and 15% Veterans for its hiring initiatives.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. The applicant shall cooperate with and provide information to Commission staff.
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



Fish Road, LLC

MCN283477

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Fish Road, LLC
40 Fish Road, Dudley, MA 01570

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Cultivation, Tier 6/Indoor (40,001 – 50,000 sq. ft.)

The application was reopened three (3) times for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type.

4. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Jonathan Androlewicz	Person Having Direct/Indirect Control / Capital Contributor
Richard Androlewicz	Person Having Direct/Indirect Control / Capital Contributor
Jenna Androlewicz	Person Having Direct/Indirect Control
Joseph Villatico	Person Having Direct/Indirect Control
Rhett Jordan	Person Having Direct/Indirect Control
Jason Villatico	Person Having Direct/Indirect Control
Malcolm Beers	Person Having Direct/Indirect Control
David Lahar	Person Having Direct/Indirect Control

5. List of all required entities and their roles in the Marijuana Establishment:

Provisional License Executive Summary 1



Entity	Role
Procure Development, LLC	Entity Having Direct/Indirect Control
Ellipsis Garden, LLC	Entity Having Direct/Indirect Control
RJ Mass, LLC	Entity Having Direct/Indirect Control
ZetaFunction, LLC	Entity Having Direct/Indirect Control

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on April 6, 2021.
8. The applicant conducted a community outreach meeting on April 7, 2021 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality of Dudley on September 3, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Provide, at a minimum, 12 expungement filings per year, or an average of one (1) expungement filing per month.
2	Give hiring consideration to at least 50% of individuals or their spouses or direct descendants who have obtained expungement services through Goal 1.

BACKGROUND CHECK REVIEW

11. There were disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions. None of the disclosures raised suitability issues.
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 applicant states that it can be operational within eight (8) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:



Day(s)	Hours of Operation
Monday-Sunday	8:00 a.m. to 8:00 p.m.

15. The 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.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Recruit 10% Minorities, 10% individuals who identify as LGBTQ+, 30% Women, and 10% Veterans and People with disabilities.

17. Summary of cultivation plan (if applicable):

The applicant submitted a cultivation plan that demonstrates the ability to comply with the Commission's regulations.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications.
4. The applicant shall cooperate with and provide information to Commission staff.
5. Provisional licensure is subject to the payment of the appropriate license fee.

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



Forest Wilde, LLC

MPN282058

MRN284185

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Forest Wilde, LLC
635 Laurel Street, Lee, MA 01238

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Product Manufacturing
Retail

The application was reopened three (3) times for its product manufacturing operations and two (2) times for its retail operations for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type.

4. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Jeanne Albano Carmichael	Person Having Direct/Indirect Control
Cassandra Purdy	Person Having Direct/Indirect Control
Jason Song	Person Having Direct/Indirect Control

5. List of all required entities and their roles in the Marijuana Establishment:

Entity	Role
Forest Wilde Holding, LLC	Entity Having Direct/Indirect Control

6. Applicant's priority status:

Provisional License Executive Summary 1



Expedited Applicant (Woman-Owned Business)

7. The applicant and municipality executed a Host Community Agreement on September 15, 2021.
8. The applicant conducted a community outreach meeting on January 5, 2021 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on September 3, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Hire, in a legal and non-discriminatory manner, at least 25% of its employees from the Target Area (specifically Pittsfield), and/or Massachusetts residents who have, or have parents or spouses who have, past drug convictions.
2	Provide industry-specific educational programs and informational sessions geared towards individuals from the Target Area (specifically Pittsfield), and/or Massachusetts residents who have, or have parents or spouses who have, past drug convictions.

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 applicant states that it can be operational within four (4) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Product Manufacturing

Day(s)	Hours of Operation
Monday-Wednesday	8:00 a.m. to 8:00 p.m.
Thursday – Sunday	8:00 a.m. to 10:00 p.m.



Retail

Day(s)	Hours of Operation
Monday-Wednesday	8:00 a.m. to 8:00 p.m.
Thursday-Friday-Sunday	8:00 a.m. to 10:00 p.m.
Saturday	8:30 a.m. to 10:00 p.m.

15. The 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.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Provide job opportunities to people of color, women, veterans, persons with disabilities, and LGBTQ+.
2	Ensure that 100% of its employees receive training on diversity and sensitivity.

17. Summary of products to be produced and/or sold (if applicable):

#	Product
1	Chocolate Bars (Dark and Milk)
2	Gummies (Blueberry)
3	Lozenges (Watermelon)
4	Topicals
5	Lotions
6	Salves
7	Oils
8	Sprays
9	Waxes
10	Shatter
11	Vape Oil
12	Tinctures
13	Keif
14	Pre-rolled Cannabis Joints

18. Plan for obtaining marijuana or marijuana products (if applicable):

The applicant will obtain marijuana or marijuana products by contracting with other licensed establishments.

RECOMMENDATION



Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. Final licensure is subject to the applicant providing Commission staff, upon inspection, with a detailed list of all proposed products to be produced with specific information as to types, forms, shapes, colors, and flavors.
4. The applicant shall cooperate with and provide information to Commission staff.
5. Provisional licensure is subject to the payment of the appropriate license fee.

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



GreenGrab, Inc.

MDA1263

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

GreenGrab, Inc.
620 Beaulieu Street, Holyoke, MA 01040

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Marijuana Delivery Operator

The application was reopened one (1) time for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

Type	Status	Location
Marijuana Courier	Application Submitted	N/A

4. The applicant was pre-certified by the Commission for Marijuana Delivery Operator on July 9, 2021. Pursuant to 935 CMR 500.101(2)(b), the applicant demonstrated a propensity to successfully operate a Marijuana Establishment.

5. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Odaliz Breton	Person Having Direct/Indirect Control
John Muise	Person Having Direct/Indirect Control

6. List of all required entities and their roles in the Marijuana Establishment:

No other entity appears to have ownership or control over this proposed Marijuana Establishment.

Provisional License Executive Summary 1



7. Applicant's priority status:

Expedited Applicant (Social Equity Program Participant)
(Odaliz Breton / 51% / SE304954)

8. The applicant and municipality executed a Host Community Agreement on May 24, 2021.
9. The applicant conducted a community outreach meeting on March 2, 2021 and provided documentation demonstrating compliance with Commission regulations.
10. The Commission received a municipal response from the municipality of Holyoke on September 8, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
11. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Host financial literacy programs at least two (2) times annually for Holyoke Youths.
2	Provide a low-interest loan or funding to at least one (1) Social Equity applicant through an investment vehicle tailored to the applicant's business circumstances.

BACKGROUND CHECK REVIEW

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

MANAGEMENT AND OPERATIONS PROFILE REVIEW

14. The applicant states that it can be operational within four (4) months of receiving the provisional license(s).
15. The applicant's proposed hours of operation are the following:

Day(s)	Hours of Operation
Monday-Sunday	8:00 a.m. to 8:00 p.m.



16. The 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.
17. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Recruit 65% Minorities, 15% women, 10% veterans, 5% individuals who identify as LGBTQ+, and 5% individuals with disabilities.
2	Contract with diverse wholesalers, vendors, and contractors such that 40% of all contract are with diverse vendors.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. The applicant shall cooperate with and provide information to Commission staff.
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



Highdration, LLC

MPN282070

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Highdration, LLC
20 Payton Street, Lowell, MA 01852

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Product Manufacturing

The application was reopened twice (2) for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type.

4. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Harry Groome	Person Having Direct/Indirect Control / Capital Contributor

5. List of all required entities and their roles in the Marijuana Establishment:

Entity	Role
Highdration, LLC	Entity Having Direct/Indirect Control

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on March 12, 2021.

Provisional License Executive Summary 1



8. The applicant conducted a community outreach meeting on April 6, 2021 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on September 3, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Provide at least three (3) Massachusetts residents who have past drug convictions or who have parents or spouses who have had drug convictions with education and support relating to sealing criminal records to reduce barriers to entry in the cannabis industry and the workforce in general.

BACKGROUND CHECK REVIEW

11. There were disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions. None of the disclosures raised suitability issues.
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 applicant states that it can be operational within four (4) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Day(s)	Hours of Operation
Monday-Friday	8:00 a.m. to 6:00 p.m.
Saturday-Sunday	Closed

15. The 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.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
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1	Hire at least 30% women; 20% People of Color; 10% Veterans; 10% persons with disabilities; 10% LGBTQ+ people
2	Host at least one (1) workshop a year that will cover topics including the prevention of sexual harassment, racial and cultural diversity, and methods of fostering an inclusive work atmosphere.

17. Summary of products to be produced and/or sold (if applicable):

#	Product
1	Flower: Indica, Sativa, High CBD varieties in the form of loose flower and pre-rolls
2	Vapes
3	Transdermal (balms and salts)
4	Sublingual (THCa tincture, tablets, mints, or any oral application)
5	Strain-Specific concentrate extraction
6	Brown rectangle milk chocolate bars
7	Circular fruit chews in the following flavors: sour apple (green), cherry (red), pineapple habanero (amber), kiwi-strawberry (dark pink), watermelon lemonade (light pink)

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. Final licensure is subject to the applicant providing Commission staff, upon inspection, with a detailed list of all proposed products to be produced with specific information as to types, forms, shapes, colors, and flavors.
4. The applicant shall cooperate with and provide information to Commission staff.
5. Provisional licensure is subject to the payment of the appropriate license fee.

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



Highmark Provisions, LLC

MCN283492

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Highmark Provisions, LLC
201 Summer Street, Holliston, MA 01746

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Cultivation, Tier 2/Indoor (5,001 – 10,000 sq. ft.)

The application was reopened three (3) times for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type.

4. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Mark Guanya	Person Having Direct/Indirect Control/Capital Contributor
Grayson Guanya	Person Having Direct/Indirect Control/Capital Contributor
Mark Vlachos	Person Having Direct/Indirect Control

5. List of all required entities and their roles in the Marijuana Establishment:

Entity	Role
Farmhaus, LLC	Entity Having Direct/Indirect Control / Capital Contributor



6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on April 3, 2021.
8. The applicant conducted a community outreach meeting on April 27, 2021 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on September 5, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Host an annual workshop centered around professional development and networking for current or potential cannabis entrepreneurs from the geographical areas of Worcester, Mansfield, and Spencer; State-designated Economic Empowerment Priority Applicants, State-designated Social Equity Program Participants; Massachusetts residents who have past drug convictions; and Massachusetts residents with parents or spouses who have drug convictions.
2	Select and onboard 1-2 individuals into the HMP Management Mentorship Program on an annual basis.

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 applicant states that it can be operational within three (3) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Day(s)	Hours of Operation
Monday-Sunday	7:00 a.m. to 7:00 p.m.



15. The 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.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Recruit 50% women, 10% minorities, 10% veterans, 3% people with disabilities, and 10% people who are LGBTQ+.
2	Will prioritize engaging vendors, ancillary services providers, and other supply chain participants that are owned and/or managed by Target Populations.

17. Summary of cultivation plan (if applicable):

The applicant submitted a cultivation plan that demonstrates the ability to comply with the Commission's regulations.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. The applicant shall cooperate with and provide information to Commission staff.
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



KG Collective Brockton

MRN281374

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

KG Collective Brockton
912 Crescent Street, Brockton, MA 02302

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Retail

The application was reopened one (1) time for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type.

Please note that individuals and/or entities associated with the proposed application(s) are also associated with two (2) retail licenses under the name of KG Collective, LLC and one (1) Marijuana Courier Pre-Certification under the name of KG Collective Delivery, LLC.

4. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Michael Pires	Person Having Direct/Indirect Control / Capital Contributor
Marcus Johnson-Smith	Person Having Direct/Indirect Control

5. List of all required entities and their roles in the Marijuana Establishment:

No other entity appears to have ownership or control over this proposed Marijuana Establishment.



6. Applicant's priority status:

Economic Empowerment Priority Applicant
(Michael Pires & Marcus Johnson-Smith/ 100% / EE201965)

7. The applicant and municipality executed a Host Community Agreement on October 24, 2019.
8. The applicant conducted a community outreach meeting on November 21, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality of Brockton on September 15, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Recruit 60% of its agents that are past or present residents of “areas of disproportionate impact,” which have been defined by the Commission; Commission-designated Economic Empowerment Priority applicants; Commission-designated Social Equity Program participants; Massachusetts residents who have past drug convictions; and Massachusetts residents with parents or spouses who have drug convictions.
2	Provide 50 hours of free, industry-specific, training and educational seminars to individuals who are past or present residents of “areas of disproportionate impact,” which have been defined by the Commission; Commission-designated Economic Empowerment Priority applicants; Commission-designated Social Equity Program participants; Massachusetts residents who have past drug convictions; and Massachusetts residents with parents or spouses who have drug convictions.
3	Donate a one-time donation in the amount of \$2,500, annually, to Women with Purpose and Minorities for Medical Marijuana.

BACKGROUND CHECK REVIEW

11. There were disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions. None of the disclosures raised suitability issues.
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 applicant states that it can be operational within three (3) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Day(s)	Hours of Operation
Monday-Sunday	8:00 a.m. to 8:00 p.m.

15. The 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.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Recruit 50% Women, 60% Minorities, 5% Veterans, 5% People with disabilities and 5% Individuals who identify as LGBTQ+.
2	Provide 20 hours of free industry-specific training to individuals who are Women, Minorities, Veterans, People with disabilities and Individuals who identify as LGBTQ+.

17. Plan for obtaining marijuana or marijuana products (if applicable):

The applicant will obtain marijuana or marijuana products by contracting with other licensed establishments.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. The applicant shall cooperate with and provide information to Commission staff.
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



Massachusetts Green Retail, Inc.

MRN284144

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Massachusetts Green Retail, Inc.
829 Boston Street, Lynn, MA 01905

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Retail

The application was reopened three (3) times for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type.

Please note that individuals and/or entities associated with the proposed application(s) are also associated with other adult-use cultivation, product manufacturing, and retail licenses and medical marijuana treatment centers.

4. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Julius Sokol	Person Having Direct/Indirect Control / Capital Contributor
Matthew Gateman	Person Having Direct/Indirect Control / Capital Contributor
William Gateman	Person Having Direct/Indirect Control / Capital Contributor
Jordan Avery	Person Having Direct/Indirect Control



5. List of all required entities and their roles in the Marijuana Establishment:

No other entity appears to have ownership or control over this proposed Marijuana Establishment.

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on May 1, 2019.
8. The applicant conducted a community outreach meeting on September 16, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on August 25, 2021, stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Hire at least 25% of its employees from Target Areas (Lynn) , and/or Massachusetts residents who have, or have parents or spouses who have, past drug convictions.
2	Provide educational programs and informational sessions geared towards individuals from the Target Areas (Lynn) and/or Massachusetts Residents who have, or have parents or spouses who have, past drug convictions that are interested in the cannabis industry, with specific focuses on marijuana retailers and entrepreneurship, at least twice a year.

BACKGROUND CHECK REVIEW

11. There were disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions. None of the disclosures raised suitability issues.
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 applicant states that it can be operational within eight (8) months of receiving the provisional license(s).

14. The applicant's proposed hours of operation are the following:

Day(s)	Hours of Operation
Monday-Sunday	10:00 a.m. to 8:00 p.m.

15. The 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.

16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Hire 35% Women; 25% Minorities; 25% Non-Binary and L.G.B.T.Q.+ individuals; 5% Veterans; and 2% Individuals with disabilities.
2	Offer 100% of the Company's opportunities for advancement to management and executive positions internally, thereby providing opportunities to its diverse workforce, to the extent its workforce has been filled by diverse individuals, for advancement.
3	100% of employees receive training on diversity and sensitivity.

17. Plan for obtaining marijuana or marijuana products (if applicable):

The applicant will obtain marijuana or marijuana products by contracting with other licensed establishments.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. The applicant shall cooperate with and provide information to Commission staff.
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



Standish Green Group, LLC

MCN283502

MPN282080

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Standish Green Group, LLC
663 Lawrence Street, Lowell, MA 01852

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Cultivation, Tier 3/Indoor (10,001 – 20,000 sq. ft.)
Product Manufacturing

The application was reopened two (2) times for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type.

4. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Paul Martignetti	Person Having Direct/Indirect Control
Anthony Martignetti	Person Having Direct/Indirect Control
Michelina Mawn	Person Having Direct/Indirect Control
Benjamino Martignetti	Person Having Direct/Indirect Control

5. List of all required entities and their roles in the Marijuana Establishment:

No other entity appears to have ownership or control over this proposed Marijuana Establishment.

6. Applicant's priority status:

Provisional License Executive Summary 1



General Applicant

7. The applicant and municipality executed a Host Community Agreement on April 27, 2021.
8. The applicant conducted a community outreach meeting on March 4, 2021 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality of Lowell on September 3, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Recruit 10% of its staff that are past or present residents of the City of Lowell.
2	Provide industry-specific educational seminars, twice a year, to past or present residents of the City of Lowell.

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 applicant states that it can be operational within six (6) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Day(s)	Hours of Operation
Monday-Sunday	8:00 a.m. to 6:00 p.m.

15. The 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.
16. The applicant proposed the following goals for its Diversity Plan:



#	Goal
1	Recruit 40% Women, 20% Minorities, 10% Veterans, 10% People with disabilities, and 10% People identifying as LGBTQ+ for its hiring initiatives.
2	Provide annual training on diversity, equity, and inclusion for all employees.

17. Summary of cultivation plan (if applicable):

The applicant submitted a cultivation plan that demonstrates the ability to comply with the Commission's regulations.

18. Summary of products to be produced and/or sold (if applicable):

#	Product
1	Concentrates (Rick Simpson Oil, Waxes, Shatters, and Kief)
2	Tinctures
3	Hard Candies (Green Apple, Blue Raspberry, Strawberry)
4	Cookies (Chocolate Chip)
5	Chocolate Bars (Chocolate, White Chocolate, Cookies & Cream)

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. Final licensure is subject to the applicant providing Commission staff, upon inspection, with a detailed list of all proposed products to be produced with specific information as to types, forms, shapes, colors, and flavors.
4. The applicant shall cooperate with and provide information to Commission staff.
5. Provisional licensure is subject to the payment of the appropriate license fee.

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



The Green Lady Dispensary II, Inc.

MRN284161

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

The Green Lady Dispensary II, Inc.
740 Beacon Street, Newton, MA 02459

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Retail

The application was reopened two (2) times for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

Please note that individuals and/or entities associated with the proposed application(s) are also associated with other adult-use cultivation, product manufacturing, and retail licenses and/or medical marijuana treatment centers.

4. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Rupert Campbell	Person Having Direct/Indirect Control
Nicole Campbell	Person Having Direct/Indirect Control / Capital Contributor
Corbet Campbell	Person Having Direct/Indirect Control
Cleantha Campbell	Person Having Direct/Indirect Control

5. List of all required entities and their roles in the Marijuana Establishment:

No other entity appears to have ownership or control over this proposed Marijuana Establishment.



6. Applicant's priority status:
Expedited Applicant (Minority-Owned Business)
7. The applicant and municipality executed a Host Community Agreement on January 13, 2021.
8. The applicant conducted a community outreach meeting on March 10, 2021 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on July 28, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Maintain a staff comprised of 10% individuals that have a drug-related CORI but are otherwise legally employable in a cannabis-related enterprise.
2	Recruit a staff comprised of 10% of individuals from designated census tracts within the City of Boston for its hiring initiatives.
3	Donate \$2,500 to Greater Boston Legal Services for the purpose of providing legal services for record expungement to Massachusetts residents on an annual basis.

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 applicant states that it can be operational within ten (10) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Day(s)	Hours of Operation
Monday-Saturday	9:00 a.m. to 9:00 p.m.
Saturday-Sunday	9:00 a.m. to 10:00 p.m.
Sunday	10:00 a.m. to 8:00 p.m.



15. The 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.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Ensure that its workforce is comprised of 30% minorities, 50% women, 10% veterans, 5% people with disabilities, 20% people who identify as LGBTQ+.
2	Provide two (2) educational training sessions annually on cultural sensitivity and recognizing unconscious bias.

17. Plan for obtaining marijuana or marijuana products (if applicable):

The applicant will obtain marijuana or marijuana products by contracting with other licensed establishments.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications.
4. The applicant shall cooperate with and provide information to Commission staff.
5. Provisional licensure is subject to the payment of the appropriate license fee.

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



Wise Man Genetics, LLC
MBN281858

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Wise Man Genetics, LLC
370 Wareham Road, Lot 2A, Building 4, Unit A, Middleborough, MA 02346

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Microbusiness (Cultivation)

The application was reopened two (2) times for additional information.

3. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

The applicant is not an applicant or licensee for any other license type.

4. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Michael Perkins	Person Having Direct/Indirect Control
Edward Han	Person Having Direct/Indirect Control

5. List of all required entities and their roles in the Marijuana Establishment:

No other entity appears to have ownership or control over this proposed Marijuana Establishment.

6. Applicant's priority status:

Expedited Applicant (License Type)



7. The applicant and municipality executed a Host Community Agreement on May 4, 2021.
8. The applicant conducted a community outreach meeting on January 19, 2021 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality of Middleborough on August 20, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Recruit at least 25% of its employees from areas of disproportionate impact, specifically, Taunton or Fall River, and/or Massachusetts residents who have, or have parents or spouses who have past drug convictions.
2	Contribute \$10,000 to the Old Colony YMCA of Taunton for the sole purpose of providing services and treatment to those affected by substance abuse.

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 applicant states that it can be operational within a year one (1) year of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Day(s)	Hours of Operation
Monday-Friday	9:00 a.m. to 6:00 p.m.
Saturday-Sunday	10:00 a.m. to 4:00 p.m.

15. The 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.
16. The applicant proposed the following goals for its Diversity Plan:



#	Goal
1	Recruit 25% Minorities, 10% Veterans, 10% Women, 10% LBGTQ+, 10% People with disabilities for its hiring initiatives.

17. Summary of cultivation plan (if applicable):

The applicant submitted a cultivation plan that demonstrates the ability to comply with the Commission's regulations.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications.
4. The applicant shall cooperate with and provide information to Commission staff.
5. Provisional licensure is subject to the payment of the appropriate license fee.

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



High Tetrahydrocannabinol (THC) Cannabis and Effects on the Human Body: More Research Needed.

A Legislative Report and Considerations for Research
and Policy.

October 2021

Massachusetts Cannabis Control Commission:

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Ava C. Concepcion, Commissioner
Kimberly Roy, Commissioner
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Table of Contents

I.	Purpose.....	6
II.	Executive Summary	6
III.	What is Cannabis?.....	7
IV.	What is Potency?.....	8
V.	Increasing THC Concentration in Cannabis	9
VI.	Brief History of Cannabis Laws	10
VII.	Challenges to Conducting Research with Cannabis	14
VIII.	Medicinal Cannabis Research Considerations	15
IX.	Methods.....	16
X.	Results.....	20
	Table 1. Total Dollars Spent on Medical Cannabis by Product Type (in millions per month	22
	Table 2. Percent of Total Monthly Medical Sales by Product Type	23
	Table 3. Monthly Medical Units Sold by Product Type (millions).....	25
	Table 4. Percent of Total Monthly Medical Units by Product Type	26
XI.	Literature Overview— THC Health Effects	33
XII.	Illicit Market Considerations	35
XIII.	Limitations	35
XIV.	Conclusion and Recommendation	36
XV.	Considerations.....	37
XVI.	References.....	41
XVII.	Appendix.....	45
	Table 1. Literature Search Results—THC Health Effects: Peer-reviewed literature reviews.....	46
	Table 2. Literature Search Results—THC Health Effects: Gray literature	48
	Table 3. Legal sales data to examine market share and/or THC concentration	50

Main Findings

Potency Research Barriers

- There are major political and practical barriers to conducting research with cannabis products.
- Much of the English-language literature base, to date, uses cannabis with low THC, which does not reflect most products sold in legal markets in the United States.
- Current English-language literature lacks standardization, making cross-study comparisons challenging.

Data from Legal Market

- Massachusetts sales data is currently limited for these research purposes. Thus, we stratify products by product category as an imperfect tool to examine demand for higher THC products (e.g., concentrates, vape products).
- Demand is high for vapes and concentrate products. In May 2020, vapes and concentrates made up 23% of sales in the medical market. and 27% of sales in the adult-use market.

Literature Overview

- Potency refers to the amount of a substance needed to achieve a particular effect.
- To examine the impact of cannabis potency on the human body, a sole focus on THC content is an incomplete measure.
- High doses of THC are associated with greater harms in some populations. Harms are greater for youth and young adults compared to adults.
- Evidence is insufficient to recommend a THC potency limitation ("cap") at this time. More work is needed to understand potential unintended consequences of limits, including potential impacts on equity, and how other components of the cannabis plant work to enhance or reduce the effects of THC in humans.

I. Purpose

This report has been prepared in response to St. 2017, c. 55, § 30 (f):

The commission shall investigate, in conjunction with the department of public health, the effects of marijuana and marijuana products with a high potency of tetrahydrocannabinol on the human body and recommend whether there should be restrictions on the potency of tetrahydrocannabinol in marijuana and marijuana products.

The Commission is unable to directly investigate the effects of tetrahydrocannabinol (THC) on the human body due to research barriers around using the cannabis plant, the feasibility of isolating one chemical component in the cannabis plant, and federal restrictions on human testing. This report synthesizes the myriad of barriers and limitations to our collective understanding of THC. The report includes a high-level literature review and an assessment of industry data in Massachusetts to examine market share of potentially high THC products. Based on this assessment, Commission staff pose considerations for the Commonwealth, other states, and researchers, which would permit a better understanding of THC potency to assist lawmakers and regulators in making evidence-based policy decisions in the future.

The Commission follows the Colorado Department of Public Health and Environment’s recent research report in interpreting the “potency of THC” as “THC concentration.”¹ THC concentration is typically measured in percentage of THC for inhaled products and in milligrams of THC for edible products and infused drinks.² However, as others have identified, understanding effects based on THC alone is limited as it does not account for other cannabinoids, such as cannabidiol (“CBD”), which may moderate psychoactive effects.³

II. Executive Summary

This legislative report, *High Tetrahydrocannabinol (THC) Cannabis and Effects on the Human Body: More Research Needed. A Legislative Report and Considerations for Massachusetts* (“report”) has been prepared in response to the enabling legislation in St. 2017, c. 55.

The enabling legislation, St. 2017, c. 55, §30 (f), requires the Commission to assess the effects of marijuana and marijuana products with a high potency of THC on the human body and recommend whether there should be restrictions on THC potency in marijuana and marijuana products. “Potency of THC” is defined as “THC concentration” throughout this report.

To fulfill this legislative requirement, the Commission analyzed medical and adult-use sales data by cannabis product category and conducted a high-level scoping literature review, including

literature reviews and meta-analyses of relevant scientific and gray literature that reports on health effects of high-THC cannabis. The Massachusetts Department of Public Health reviewed the report.

This report finds that there is high demand for cannabis products with high-THC concentrations in the legal market [see Section X. Results]. The scientific literature is limited by research restrictions and data limitations [see Section VII. Challenges to conducting research and Methods: Data Considerations]. Higher concentrations of THC outside of a medical cannabis setting are associated with greater harms for some populations.⁴ Among non-medical adult-users (“recreational”), consumption of products with high THC concentrations is likely associated with greater risks, but current evidence is incomplete. Among non-medical youth users, the use of highly potent THC products carries risks [See Section XI. Literature Overview]. Among medical cannabis users, evidence is currently insufficient to draw conclusions regarding high THC concentration and effect on the human body.

After assessment of the available Massachusetts data and literature pertaining to cannabis THC concentration limits for consumption and manufacturing purposes, scientific evidence is not sufficient to recommend a specific concentration limitation [see Section X. Methods and Section X. Results]. However, the Commission follows the National Institute on Drug Abuse (“NIDA”)’s expertise in recommending five milligrams of THC as the standard unit for research and reporting purposes.

Commission staff conclude that evidence is not sufficient to recommend a concentration limit currently [see Section XIV. Conclusion and Recommendation]. The Commonwealth may wish to increase scientific surveillance capacity to monitor high-THC cannabis product use [see Section XVI. Considerations].

To address some of the current data limitations, Commission staff offer multiple considerations to increase data capacity [see Section XV. Considerations]. A reassessment in the future may be warranted as the scientific evidence matures.

III. What is Cannabis?

Cannabis (“marijuana”) is the term often used in the United States (U.S.) to define the components of several cannabis plant varieties, including Cannabis Indica and Cannabis Sativa. Although cannabis varietal names and the cultural terminology for cannabis (*e.g., marijuana, ganja, grass, hash, pot, weed*) are often used interchangeably, the term *cannabis* is used for purposes of this report.

Cannabinoids are important biological markers unique to the cannabis plant and refer specifically to a group of varying molecules (terpenophenolic compounds) that bind to cannabinoid receptors in the body.^{5,6} There are more than 100 known cannabinoids.⁵ The ratio of two cannabinoids, delta-9-tetrahydrocannabinol (THC) and cannabidiol (CBD), in an individual plant contribute to its discrete chemical phenotype. There are three major chemical phenotypes: (1) Chemotype I, where there is a high THC concentration, (2) Chemotype II, where CBD is the prevalent cannabinoid and THC is lower, and (3) Chemotype III, where there is a low THC concentration.⁵

Cannabinoids are categorized as: (1) endogenous (endocannabinoids), (2) synthetic cannabinoids, and (3) phytocannabinoids. THC and CBD are phytocannabinoids and have particular importance for understanding cannabis concentration. THC is the main intoxicating component of cannabis contributing to cognitive effects, potential medicinal effects, and substance use dependence potential.⁷ THC binds to cannabinoid receptors, CB₁ and CB₂, in the brain and body and has the potential for therapeutic and adverse acute and long-term effects. Such effects can include impairment of cognitive functions, analgesia, intoxication, short-term memory loss, muscle relaxant, and anti-inflammatory effects.⁸ CBD is a non-intoxicating cannabinoid but a highly physiologically relevant component.⁷ Effects of CBD on humans are studied less than those of THC, but include anti-anxiety, anti-psychotic, antioxidant, anti-inflammatory, and immunomodulatory effects, as well as modulation of the metabolism of THC and prevention of glutamate excitotoxicity.⁷

Less is known about other cannabinoid profiles and their impacts on the human body. Recently, Delta-8-Tetrahydrocannabinol, another psychoactive cannabinoid, is gaining public attention, but a comprehensive understanding of the full range of cannabinoids is not yet known. Further assessment of effects of other cannabinoids which have potential for adverse outcomes, such as Delta-8-Tetrahydrocannabinol, may be warranted in the future as science better understands the effects of other cannabinoids and cannabinoid profiles.

IV. What is Potency?

Potency refers to the amount of a substance needed to achieve a particular effect. However, the unique characteristic of cannabis means that there is no specific dose that can reliably achieve a particular effect across individuals. A recent report by the Colorado Department of Public Health and Environment describes this phenomenon:

Although “potency” is the term commonly used to describe THC concentration or content, it has a different pharmacologic meaning. The proper use of the term potency is used to express the activity of a drug, in terms of the amount required to produce a defined effect. The term “potency” is inaccurate when discussing marijuana clinical effects since the active compound, THC, is the same in all marijuana products, and the

effect on cannabinoid receptors is therefore consistent across products, on the cellular level. Since the effects of THC are subjective, differing between individuals and dependent on mode of use, a known amount to produce a defined effect does not exist. Misuse of the term potency in this way may also give a false sense that any risk has been mitigated due to testing the relationship of amount to effect. Increasing the concentration of THC can lead to an increase in the dose consumed. Even low doses may affect some individuals in adverse ways, though as dose increases, risk increases.¹

Thus, Commission staff similarly interpret THC potency as THC concentration, for which reliable measures exist. Per the Colorado Department of Public Health and Environment's work, THC concentration is defined as, "THC content per volume or weight of marijuana products, usually measured in milligrams or percentage."¹ THC concentration is typically measured in percentage of THC for inhaled products and in milligrams of THC for edible products and infused drinks.² Dose or dosage refers to the amount of THC consumed at one time point.¹

To date, Massachusetts regulations set dosage restrictions for only one cannabis product type: edibles. A single serving may not contain more than 5.5 milligrams of THC (which includes a 10% allowed variance) and a single package of multiple edibles may not contain more than 20 servings. For all products, Massachusetts requires labeling which identifies the product's cannabinoid profile (i.e., the amounts, expressed as the dry-weight percentages, of delta-9-THC, CBD, tetrahydrocannabinol acid and cannabidiol acid in a Marijuana product) (935 CMR 500.000).

As of May 2021, new guidance from NIDA to cannabis researchers declared a standard dose of 5 milligrams of THC to be used for human research.⁹ The purpose of this standardization is to allow for greater comparability between studies; ultimately increasing scientific knowledge and better reflecting the marketplace and real world application.¹⁰

However, assessing THC alone is inadequate as it does not account for other cannabinoids, such as CBD, which may moderate or otherwise interact with psychoactive effects of THC, or the other less studied chemical components of the cannabis plant [see [Section III. What is Cannabis?](#)]. Nonetheless, the Commission focuses this report on THC concentration as it is the most well-understood cannabinoid implicated in cannabis' psychoactive effects on the human body in the scientific literature and is best represented in currently available data.

V. Increasing THC Concentration in Cannabis

The scientific literature shows that THC concentration in cannabis grown in North America has increased.^{11,12} An analysis of cannabis seized by the Drug Enforcement Administration (DEA) from 1995 to 2014 shows this increase.⁶ In the seized sample, average THC concentration

increased from 4% in 1995 to 12% in 2014, whereas CBD concentration decreased during this timeframe.⁶

In the legal adult-use markets, researchers observe a similar trend toward increasing THC concentrations in the short-term but also show some evidence of tapering off. For example, Jikomes and Zoorob (2018) examined THC concentrations in cannabis flower using legal sales data from Washington State. Researchers found the THC concentration in flower increased from 2014-2015, then stabilized from 2015-2017 [see Section XVII. Appendix Table 3].¹³

Research across several states with regulated cannabis sales also identify a trend toward increasing market share of higher concentrated THC cannabis products (i.e., extracts) while observing a decline in market share of flower [see Section XI. Literature Overview]. As cannabis legalization policies precede scientific knowledge, research on the varied impacts of high THC cannabis and newer modes of consuming high THC cannabis (e.g., dabbing) are critical.

Most scientific studies are based on low-THC cannabis as products available for research historically have lower THC concentrations than legally sold products [see Section VII: Challenges to conducting research with cannabis]. The extent to which the current literature findings will apply to high THC cannabis is unknown. Studies are further limited by a lack of standardization in THC dosage, which makes comparisons between studies challenging. However, recent action by NIDA to create a standard dose of 5 milligrams of THC for research purposes may help rectify part of this challenge going forward.⁹

NIDA Director, Dr. Nora Volkow, states: “Adoption of a standard unit for measuring and reporting purposes will facilitate data interpretation and will make it possible to design experiments on drug effects that have real-world relevance, as well as make it easier to translate that research into policy and clinical practice.” Further clarifying that, “a standard unit is not a limit, nor any kind of recommendation for consumption that would apply to consumers or to dispensaries; it is simply a unit of measure to help facilitate cannabis research. Similar standard measures have also been applied for other substances.”¹⁰

VI. Brief History of Cannabis Laws

International

Worldwide, cannabis has been used for religious, recreational, and therapeutic purposes for thousands of years, although it has been predominantly illegal since the 1961 United Nations (U.N.) Single Convention on Narcotic Drugs.

National: United States

In the U.S., cannabis cultivation and use were legal under federal and state laws throughout most of modern American history. The first evidence of cannabis use in the U.S. was in 1611, when hemp was produced for its fiber and seed. Its therapeutic use was introduced into Western medicine by Irish physician, William Brooke O'Shaughnessy, in 1839. Cannabis's therapeutic potential was recognized by some U.S. physicians in the 1840s. From 1850 to 1941, cannabis was included in the *United States Pharmacopeia*, an official list of public standards for recognized medicinal drugs. The use of medicinal cannabis decreased as the development of other pharmaceuticals increased (*e.g., aspirin, morphine, and other opium-derived drugs*).

Social reform policies in the 20th century aimed to reduce recreational use of many substances, including cannabis. An increase in cannabis use from 1910-1920 led 29 states, including Massachusetts, to pass laws prohibiting the possession or sale of cannabis. State-level changes in cannabis policy led to its inclusion in the 1940's amendment to two federal policies: The Uniform Narcotic Drug Act of 1932 and the Marihuana Tax Act of 1937. The Marihuana Tax Act of 1937 moved toward federal criminalization through exorbitant fines for cannabis use, possession, and cultivation.

The Federal Controlled Substance Act (CSA) of 1970 replaced the Marihuana Tax Act and made it additionally illegal under federal law for physicians to prescribe cannabis medicinally. Despite the increasing stringency of federal cannabis policies over time, use of cannabis continued.

In 1971, President Richard Nixon declared a War on Drugs, proclaiming: "America's public enemy number one in the United States is drug abuse. In order to fight and defeat this enemy, it is necessary to wage a new, all-out offensive." The purpose of Nixon's "War on Drugs" policies were to combat drug abuse on both the supply and demand sides. However, a disproportionate number of these policies focused on criminal justice enforcement and punishment for drug offenses thus, creating systematic changes in the criminal justice system. These policies assisted in creating both the "Law and Order" (i.e., politicization of crime) and "Crime and Punishment" (i.e., a culmination of fear of street crime that created a "morally and justified" reason for the heavy punitive response to drug crime) phenomena.

Currently under the CSA, the DEA classifies cannabis as a Schedule 1 drug, the most restrictive ranking ("scheduling") on par with heroin, contending that it has: (1) a high potential for abuse, (2) no current accepted medical use in the U.S., and (3) a lack of accepted safety for use under medical supervision. Since 1970, there have been multiple efforts by activists, researchers, and others to reschedule cannabis at the federal level, including in recent months with the [Cannabis Administration and Opportunity Act](#).



The U.S. Food and Drug Administration (FDA) is responsible for the oversight and implementation of the 1906 Pure Food and Drug Act, which prevents the manufacture, sale, or transportation of adulterated, misbranded, poisonous, or deleterious foods, drugs, medicines, and liquors. The FDA's role in the regulation of drugs, which includes cannabis and cannabis-derived products [e.g., Marinol (i.e., dronabinol), Cesamet (i.e., nabilone), Syndros (i.e., dronabinol), Epidiolex (i.e., cannabidiol)], includes a review to determine whether proposed drug products are safe and effective for their intended use before products can go to market. The FDA has not approved the cannabis plant for the treatment of any disease, symptom, or condition with exception of approved medicines that include cannabis extracts approved to treat specific medical conditions.¹⁴

State Level

There are three types of cannabis-use policies enacted at the state or local level in the U.S. that allow for regulation despite cannabis' federal status: (1) decriminalization but not regulation or legalization, (2) medicinal cannabis legalization, and (3) recreational or adult-use cannabis legalization.

The first wave of cannabis policy change was decriminalization, which differs from legalization, and was defined in 1972 by the National Commission on Marijuana and Drug Abuse, as policies replacing criminal sanctions for the possession for personal use or casual distribution of cannabis in small amounts with civil fines. States with decriminalization designate offenses as low-level misdemeanors without jail sentences for qualifying offenses or a civil infraction.

Since 1996, 36 states, the District of Columbia (D.C.), and four territories have enacted varying laws legalizing comprehensive medicinal cannabis programs,¹⁵ which include four main features: (1) protection from criminal penalties for using cannabis for a medical purpose; (2) access to cannabis through home cultivation, dispensaries, or some other system; (3) allowance for a variety of strains and/or consumption methods; and (4) allowance for either smoking or vaporization of some type of cannabis product, plant material, or extract. An additional 12 states permit use of "low THC, high CBD" products for medicinal reasons or as a legal defense in limited situations.¹⁵ These states are not considered "medical cannabis" states.

Since 2012, 17 states, D.C., and two territories have enacted varying laws legalizing small amounts of cannabis for non-medical, adult-use by adults 21 years old or older.¹⁶

It is important to note that since 1996, cannabis legalization policies (i.e., medicinal and non-medicinal adult-use) have been enacted at the state level, creating a heterogenous patchwork of policies, provisions, liberalization of provisions, regulation, enforcement, and fidelity of

enforcement across states. THC concentration caps vary across states and potentially within states.¹⁷

These differences and limitations in regulation and cultivation of cannabis sale and use make research into THC's effects on the human body difficult to examine. Until recently, very few states, and only those with regulated cannabis markets, have undertaken research into how cannabis use affects users. In the U.S., we found no evidence or report of clinical research covering this broad topic. These research limitations contribute to gray areas and hinder regulators from making evidence-based decisions about THC concentration caps and other matters.

Legal Background: Commonwealth of Massachusetts

Massachusetts enacted and implemented three types of cannabis policy changes in three waves of ballot initiatives: cannabis decriminalization in 2008 with Question 2, "*The Sensible Marijuana Policy Initiative*"; medicinal cannabis legalization in 2012 with Question 3, "*An Initiative Petition for a Law for the Humanitarian Medical Use of Marijuana*"; and non-medical adult-use cannabis legalization in 2016 with Question 4, "*Massachusetts Legalization, Regulation and Taxation of Marijuana Initiative*".

i. State Laws Governing the Cultivation, Production, Transportation, or Sale of Medical and Adult-Use Cannabis

- St. 2008, c. 387: *An Act Establishing A Sensible State Marijuana Policy*
<https://malegislature.gov/Laws/SessionLaws/Acts/2008/Chapter387>
- St. 2012, c. 369: *An Act for The Humanitarian Medical Use of Marijuana*
<https://malegislature.gov/Laws/SessionLaws/Acts/2012/Chapter369>
- St. 2016, c. 334: *The Regulation and Taxation of Marijuana Act*
<https://malegislature.gov/Laws/SessionLaws/Acts/2016/Chapter334>
- St. 2017, c. 55: *An Act to Ensure Safe Access to Marijuana*
<https://malegislature.gov/Laws/SessionLaws/Acts/2017/Chapter55>
- M.G.L. c. 94G: Regulation of the Use and Distribution of Marijuana Not Medically Prescribed: <https://malegislature.gov/laws/generallaws/parti/titlexv/chapter94g>
- M.G.L. c. 94I: Medical Use of Marijuana:
<https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXV/Chapter94i>

ii. State Laws Governing Controlled Substances

- M.G.L. c. 94C: *Controlled Substances*
<https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXV/Chapter94C>



iii. Current Cannabis Regulations

- 935 CMR 500.00: *Adult Use of Marijuana* https://masscannabiscontrol.com/wp-content/uploads/2021/05/210416_Adult_Use_Regulations.pdf
- 935 CMR 501.000: *Medical Use of Marijuana* https://masscannabiscontrol.com/wp-content/uploads/2021/05/210416_Medical_Use_Regulations.pdf

iv. Sub-Regulatory Guidance

- *Commission Guidance Documents* <https://masscannabiscontrol.com/public-documents/guidance-documents/>

VII. Challenges to Conducting Research with Cannabis

As discussed above, in the U.S., there are major barriers to conducting research with cannabis products. These challenges contribute to the current gaps in the scientific literature surrounding the impacts of high-THC concentration cannabis products on the human body and severely limit the ability to enact evidence-based policy decisions. A recent article in the *New England Journal of Medicine*, Zarrabi et al., (2020), describes these barriers.¹⁸ In short, the DEA currently classifies cannabis as a Schedule 1 drug meaning there is no (federally) accepted medical use and a high potential for abuse. Researchers trying to conduct studies that involve human cannabis consumption, including clinical trials, must obtain FDA and DEA approval. These processes can take a year or longer.¹⁸ A recent federal report by the U.S. Senate Caucus on International Narcotics Control (2021) states that the maximum time it should take for schedule 1 registration is 47 days, and the DEA reports an average of 52 days for completed applications. Applications deemed incomplete (about 70% of submitted applications), have a substantially delayed processing time.¹⁹ Researchers are also subject to background checks and research site visits.¹⁹

After approval, the researchers can only use cannabis approved by NIDA, and grown and managed by the University of Mississippi, the only federally approved cultivator of cannabis for research purposes.¹⁸ This supply does not mirror the array of products and THC concentrations sold at cannabis retailers (or in the illicit market) or the variety and regional differences in cannabis, and the quality of products may be poor.¹⁸ Further, any changes to the research protocol requiring review and approval by the FDA or DEA will slow the research process further.¹⁹ Given the limitations on the cannabis from the University of Mississippi, if a researcher was able to navigate the regulatory barriers, institution-specific barriers, and Institutional Review Board (IRB) processes, the researcher's study findings may have limited utility for understanding cannabis' effects on humans.¹⁸

In March 2020, NIDA issued a [Request for Information \(RFI\)](#) regarding the establishment of a standard dose of THC to facilitate cannabis research. In May 2021, NIDA, along with the National Cancer Institute, the National Heart, Lung, and Blood Institute, and the National



Institute of Mental Health, published a notice in the National Institute of Health (NIH) Guide directing researchers funded by these institutes to measure and report their findings from clinical research on cannabis using a standard unit of THC of 5 milligrams. The purpose of this standardization is to allow for greater comparability between studies, ultimately increasing scientific knowledge and increasing real-world application, including translating research into policy and clinical practice.¹⁰

The implementation of a standard unit for measuring and reporting purposes in research will permit researchers to design experiments on cannabis effects that could have real-world relevance, facilitate more precise data interpretation, and begin to translate the spectrum of research conducted into evidence-based policy and clinical practice. The challenge remains, however, for researchers to access cannabis products like what are currently available to consumers in the U.S.

VIII. Medicinal Cannabis Research Considerations

Given the beforementioned challenges of using cannabis for research, the current state of research on the medical efficacy of cannabis to treat specified disorders and symptoms is mixed and varied.

A recent dissertation study conducted by Dr. Alexandra F. Kritikos comprehensively assesses medical cannabis laws and provisions, medicinal patients and concentration levels of products purchased, gaps in research, and effects on policy in New York State. Dr. Kritikos' study pioneers the use of sales data from dispensaries and provides a unique opportunity to investigate medical cannabis use from an alternative perspective. In her work, she discusses critical points relevant to concentration.

Kritikos (2021) states that cannabis is a plant consisting of more than 100 chemical components, which does not meet the standards required for medicinal approval of other medications by the FDA. Further, Kritikos reports that most research on the therapeutic efficacy of cannabis has been conducted using oral preparations formulated by pharmaceutical companies, not inhaled preparation common to many users. Preparations include dronabinol (Marinol) and nabilone (Cesamet), synthetic analogs of THC, and nabiximols (Sativex), a cannabis-derived oromucosal spray containing THC and CBD in a 1:1 ratio.^{20,21}

There is insufficient research evidence on the short- and long-term health effects of THC and CBD products, especially under legalization, which expedited the production of novel cannabis products and high THC concentrations compared to those products used in clinical trials, which are usually a lower concentration THC.^{20,22,23} This finding is relevant for those accessing medical cannabis through the “gray market.” Recent research suggests that “gray market” access to medical cannabis is increasingly common among Massachusetts youth in treatment for cannabis use disorders, warranting additional research.²⁴

Kritikos (2021) further sheds light on how cannabis legalization has impacted innovation in cannabis manufacturing and cultivation to produce varying cannabinoid profiles. Similarly, regulated markets have resulted in modes of administration, which changed the ways cannabis is consumed: “Cannabis potency and modes of consumption have evolved quickly since it first became legalized. Medicalization brought new products (e.g., edibles, tablets), new potency levels, and new modes of consumption (e.g., vaping).”²⁰

Changing THC concentration cannabinoid profiles of available legal market products and modes of consumption are specifically important for youth, who face greater risks than adults do when it comes to cannabis use and high THC concentration cannabis use.⁴ Additional considerations should be made for both the medical efficacy for treating youth medical patients with high-THC products, as well as the potential for diverted use among youth [see Section XV. Considerations: (1) Research Consideration #s 2, 3; (2) Policy and Regulatory Considerations, All States Considerations #s 3, 4, 6, 8; and (3) Policy and Regulatory Considerations, Massachusetts Consideration #1].

Unlike medications approved through the formal data-driven process by the FDA, currently, there is no clear optimal dosing information of cannabis in its approved medical conditions,²⁰ which vary across states. The newly enacted standardized THC dose for research may help alleviate this fundamental limitation as it pertains to THC; however, further research will still be needed to assess interactions with other cannabis chemical components, varying routes of administration, and variations in the test subjects.¹⁰

In an important statement, Kritikos explains that, “despite the lack of scientific research in the legalized markets, medical cannabis use is now common in clinical practice, and physicians are increasingly faced with questions from patients about cannabis and its medical applications. Therefore, providers and policy makers must understand both the scientific rationale and the practical implications of medical cannabis laws.”²⁰ This highlights a critical call for researchers and policymakers alike.

IX. Methods

This report consists of data analysis and a high-level literature overview. As high-quality reviews on this topic have previously been conducted, we focused our literature search primarily on peer reviewed literature and on relevant gray literature (i.e., reports and articles that were not published through academic reviewed journals, such as government reports).

Data Considerations

The Commission considered multiple data sources for inclusion in this report. We largely relied on the report, “[*Special Report: Evaluating the Impact of Cannabis Legalization in*](#)

[*Massachusetts: State of the Data*](#)” to identify potential surveillance data sources.²⁵ Only one surveillance source considered for inclusion, the [International Cannabis Policy Study](#), asks participants to report THC concentrations for cannabis products they consume. However, a study of consumer knowledge about the THC and CBD levels of the products that they use found consumer knowledge was low. These authors conclude: “... despite the potential utility of collected self-reported data on THC and CBD levels in population based surveys, the accuracy of these data is dubious and should be interpreted with considerable caution.”³ This suggests that consumer education is necessary before self-reported cannabinoid profiles have broader utility for surveillance purposes [see [Section XV. Considerations: Educational Considerations #1](#)].³ In light of this knowledge gap and in order to align with other states’ efforts, we focus this report on the cannabis product types that are more likely to have high THC concentrations as an attempt to isolate use of high-concentration cannabis products.

There is not a universal definition of cannabis product types likely to have high THC concentrations. For example, Colorado’s recent state report on THC concentration included smoking, eating, drinking, vaporizing, or dabbing cannabis among the methods of cannabis consumption for a statewide survey (i.e., Behavioral Risk Factor Surveillance System (BRFSS)). The authors noted: “The only method of use on BRFSS that can provide an unbiased estimate of adult use of high concentrated THC products is dabbing.”¹ Alternatively, a report from Washington State took a broader approach and examined the prevalence of consumption by dabbing, eating, and vaping in their state BRFSS.¹¹ For the purposes of the Commission’s report, and due to our data classification, we follow Washington State’s broader approach. We consider *potentially high THC cannabis products* as cannabis concentrates, vaping products, and edibles. We are limited to using potentially high THC cannabis product categories, because the data’s current form does not allow us to extract THC concentrations without an exhaustive manual process³ [see [Section XV. Considerations: Policy and Regulatory Considerations: Massachusetts: Considerations #1](#)]. The approach is further limited as individual products with lower amounts of THC (e.g., an edible with a low THC concentration) in potentially high THC categories cannot be differentiated.

While sales data is one way to understand consumer behavior, it does not capture home-grown or illicit market use. To address this limitation and to better triangulate trends in potentially high THC cannabis consumption, other states’ reports leverage an optional cannabis (“marijuana”) module in BRFSS. This module contains cannabis behavior questions and is a strong surveillance measure because participants are a generalizable state sample. Unfortunately, the Massachusetts BRFSS does not include an optional cannabis module which asks about the mode of cannabis use.²⁶ While Massachusetts does add in multiple optional questions related to cannabis, mode of use, or other measure(s) which could identify potentially high THC products are not currently available for surveillance purposes. Thus, we do not include data from BRFSS

in this report³ [see Section XV. Considerations: Policy and Regulatory Considerations: Massachusetts: Consideration #4].

At the time of writing, other key surveillance data sources, including Massachusetts's Youth Risk Behavior Surveillance System (YRBSS) do not ask about mode of use (excluding 2015 National YRBSS that asked about method of use).²⁶ Likewise, the Massachusetts Youth Health Survey (YMS) does not ask a question about mode of cannabis use.²⁶ At the time of last assessment in 2019, the Massachusetts Pregnancy Risk Assessment Monitoring System (PRAMS), a surveillance system for pregnant people, had not added an optional module about cannabis use.²⁵

Due to these limitations, this report solely relies on the Commission's collected data on legal medical and adult-use sales by product category [see methods below].

Sales Data

Massachusetts collects a wide range of data in its mandatory seed-to-sale tracking system of record (i.e., Metrc). Licensed Marijuana Establishments must input data for all plants (i.e., immature, vegetative, flowering) and for all packages made from each batch of cannabis. For each package, licensees must input an item name, product category, quantity, and unit of measure. Stringent testing protocols are required for all cannabis products, and unique identifiers allow for traceability back to a product's original tested batch. Within this system, all cannabis and cannabis products are linked to specific licensees, and cannabis products can be traced back to the original cultivation.

In Massachusetts, regulated medical cannabis sales began in June 2015, and adult-use cannabis sales began in November 2018.

For this report, we extracted Massachusetts medical sales data from May 1, 2019 to March 31, 2021, and adult-use sales data from December 1, 2018 to March 31, 2021. The start date for the data on medical sales is later than adult-use because medical dispensaries were not required to use Metrc until September 2019, after the Commission became responsible for regulation of medical- and adult-use entities.

Specifically, we extracted the total sales in dollars for each product category and total units of the product sold for each month in the study timeframe. Medical market sales represent patient and caregiver purchases and are presented separately from consumer sales in the adult-use market.

Each cannabis product is classified as one of the following product categories: Buds, Concentrate, Concentrate (each), Infused edible, Infused (non-edible), Kief, Raw pre-roll,

Infused pre-roll, Infused Beverage, Shake/Trim, Shake/Trim (by strain), Suppository, Vape Product, and Waste. The column “Waste” was dropped from analysis as this indicates a product was destroyed and not sold to a consumer. There is no specific codebook or definitions for each of these categories, therefore, different retailers may classify similar products differently.

Product classification options changed since the seed-to-sale tracking system began. Use of the product categories for “pre-rolls” began in March 2019. Wide use of the product category “Vape Product” occurred in December 2019 for both the non-medical adult-use and medical markets. Before this was an option, most retailers were classifying vape products under the category “Concentrate (each),” therefore, to maintain comparability across the time frame, we created a new category, “Vape and Concentrate (each),” which sums the totals in “Concentrate (each)” and “Vape Product.” This allows comparability from before December 2019 to after. The product category “Infused Beverage” was also an added classification; its use began in February 2021.

For clarity in reporting purposes and visuals, we collapse the product categories that made up 1% or less of total sales into the category “Other product.” Other contains the following categories: “Concentrate,” “Infused (nonedible),” “Infused Beverage,” “Infused Pre-rolls”, “Kief”, “Shake/trim”, “Shake/trim (by strain)”, and “Suppository”. After these data cleaning steps, the final analytic dataset had five product categories: “Vapes and concentrate (each) merged”, “Raw pre-rolls”, “Buds”, “Infused edibles”, and “Other”.

In the scientific literature, Smart et al. (2017) use Washington State seed-to-sale data and operationalize market share by product type in the following way: “... product categories are calculated as percent of total tax-inclusive expenditures in the market ...” [online supplementary appendix].²⁷ We follow this conceptualization but calculate market share for each product type as the percent of total expenditures *excluding* tax, as the tax dollar amount is not included Massachusetts data [See Report, *Feasibility of Alternative Tax Schemes: A Legislative Report and Recommendation for Massachusetts*, for detailed information on Massachusetts’ cannabis tax structure]. Similarly, we calculate the share of total units as the percent of total units for each product category. Due to time and financial constraints, we present only descriptive findings and follow Firth et al. (2019) in displaying findings through a stacked area chart showing total sales per month on the vertical axis (e.g., Tables 1 and 3)² and follow Davenport (2019) in displaying findings through a 100% stacked area chart showing the percent of total monthly sales that each product type represents (e.g., Tables 2 and 4).²⁸

Several major changes occurred during this study period, which could impact product type trends. The Centers for Disease Control and Prevention (CDC) began standardized data collection to investigate e-cigarette or vaping product use-associated lung injury (EVALI), a novel public health threat, in August 2019 and identified a peak in EVALI cases in September 2019. The CDC stopped collecting data on EVALI in February 2020 due to the identification of

the primary cause and the decline in cases.²⁹ In Massachusetts, Governor Baker and then the Commission quarantined all vape products from September 24, 2019 through December 12, 2019, meaning no vape products could be sold in stores. On December 12, 2019, the Commission allowed vapes manufactured after December 12, 2019, to be sold in stores and on August 4, 2020, the Commission allowed vapes manufactured before December 12, 2019, to be sold in stores subject to a re-testing and remediation process. The COVID-19 pandemic also began during this study timeframe. Notably, in Massachusetts, a pandemic-related emergency order temporarily halted adult-use sales from March 24, 2020, through May 24, 2020. The medical market remained open during this time.

Peer-review Literature Review

The Commission staff conducted targeted searches of peer-reviewed scientific literature in March and April 2021 on PubMed and Google Scholar. The search terms included “cannabis,” “cannabis use,” “psychological disorders,” “mental health,” “potency,” “THC,” “high potency,” “literature review,” “risk factors,” and “cannabinoids”, and prioritized literature reviews published from 2008 to 2021. [Appendix Table 1]

In May 2021, Commission staff conducted targeted searches in Google Scholar and through reference review of identified articles to identify articles that use legal seed-to-sale tracking systems to examine product and concentration trends. The search terms included: “cannabis,” “potency,” “THC,” “seed-to-sale,” “legal market,” “recreational legalization,” and “Washington.” [Appendix Table 3]

Gray Report Review

Staff also conducted a secondary search for relevant gray literature (*i.e., reports and articles that were not published through academic reviewed journals*) through targeted Google searches. Search terms included the following: “THC concentration,” “report,” “THC,” “cannabis,” “high-potency,” “marijuana,” and “potency.”

This part of the search prioritized governmental reports and was limited to reports written in English. Staff also conducted reference review and searched author reference libraries. [Appendix Table 2]

X. Results

Medical-use Sales

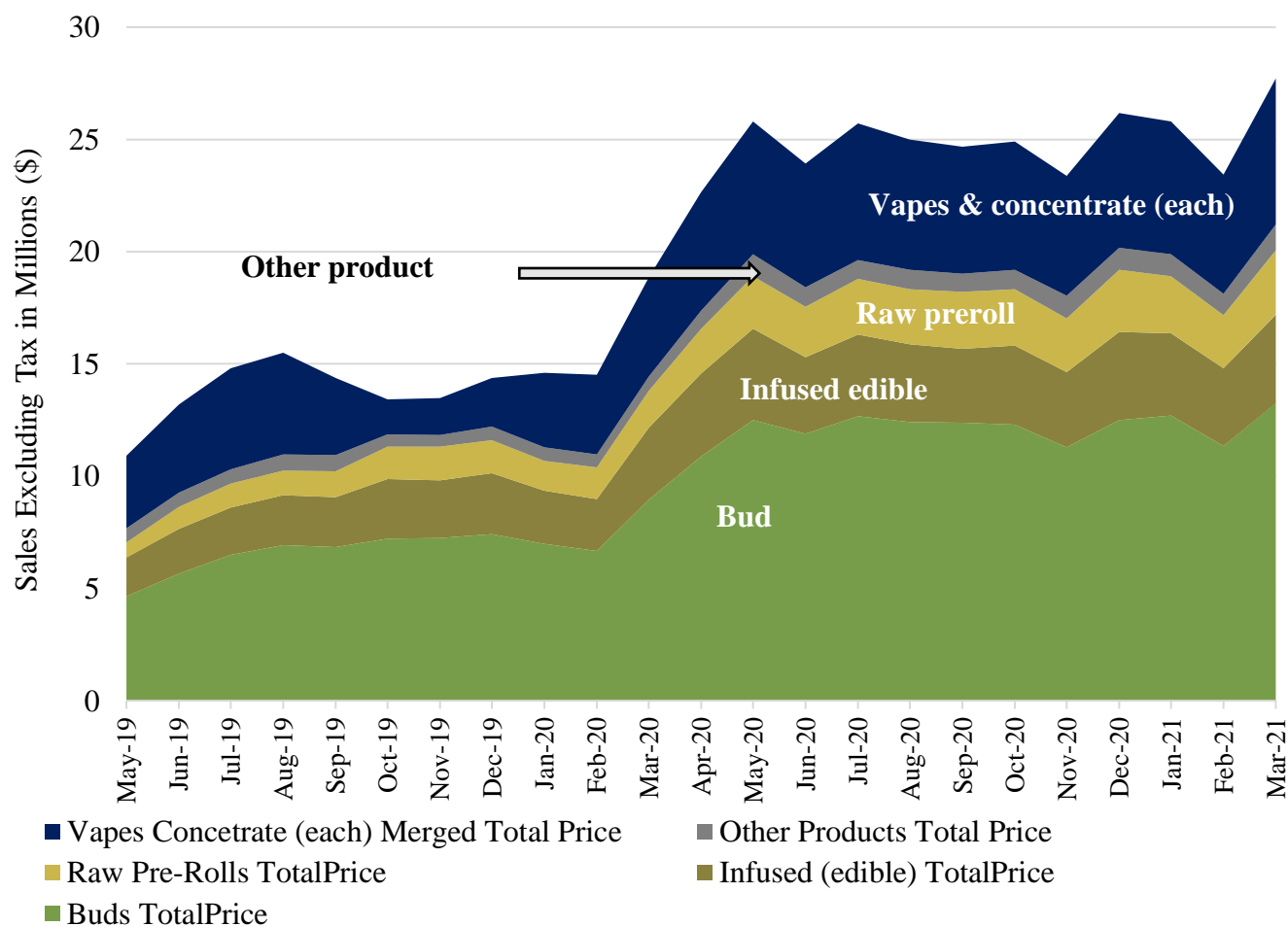
Tables 1 and 2 show medical sales stratified by product category per month. Table 1 shows the total sales in millions of dollars on the left Y-axis (vertical). Table 2 shows the percentage of

total sales on the left Y-axis (vertical). For example, if there were 50 million sales in Month X, the highest point for the month on Table 1 would be level with 50 million and 100% on Table 2 would equal 50 million.

Concentrates and vape products typically have higher THC concentrations as compared to buds. In May 2019, vapes and concentrate (each) made up 30% of total sales, and in May 2020, vapes and concentrate (each) made up 23% of total sales. However, during the EVALI public health crisis and the Commission's quarantine on vape products, vapes and concentrates as a percentage of total sales fell to between 12-15% from October 2019 through December 2019.

In May 2019, buds made up 43% of total medical cannabis sales, and in May 2020, buds made up 48% of total medical sales. Edibles made up 16% of sales at both time points, and raw pre-roll made up 6% (May 2019) to 9% (May 2020) of sales.

Table 1. Total Dollars Spent on Medical Cannabis by Product Type (in millions per month)



Notes:

From top to bottom: blue shaded section represents products classified as vapes or concentrate (each), gray shaded section represents products classified as other product [see note below], yellow shaded section represents products classified as raw pre-rolls, brown shaded section represents product classified as infused edibles, and green shaded section represents products classified as buds.

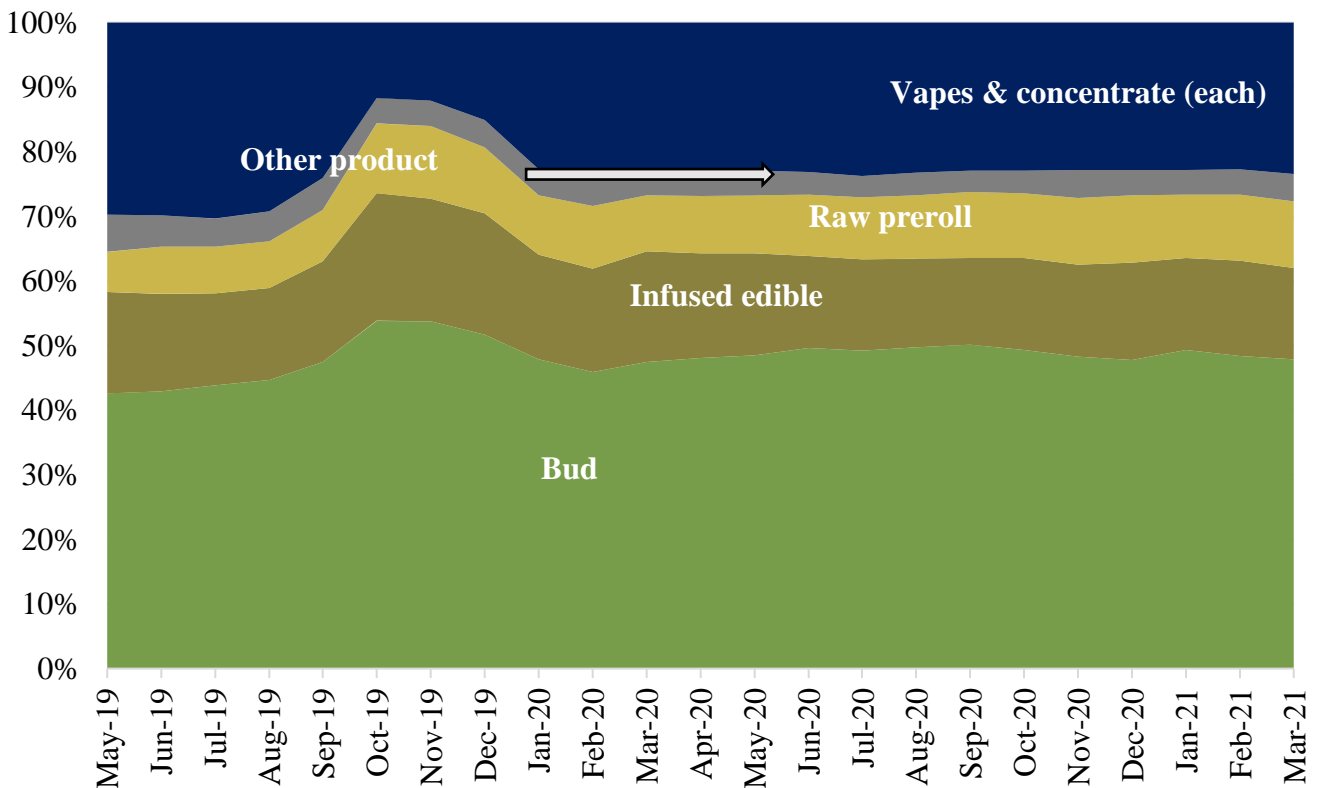
Raw pre-rolls category began to be used in March 2019, and April 2019 was the first month it was used for the entirety of the month.

Vape products category began to be used in December 2019.

Sales are not inclusive of tax.

Other products include: Concentrate, Infused (nonedible), Infused Beverage, Infused Pre-rolls, Kief, Shake/trim, Shake/trim (by strain), and Suppository.

Table 2. Percent of Total Monthly Medical Sales by Product Type



Notes:

From top to bottom: blue shaded section represents products classified as vapes or concentrate (each), gray shaded section represents products classified as other product [see note below], yellow shaded section represents products classified as raw pre-rolls, brown shaded section represents product classified as infused edibles, and green shaded section represents products classified as buds.

Raw pre-rolls category began to be used in March 2019, and April 2019 was the first month it was used for the entirety of the month.

Vape products category began to be used in December 2019.

Sales are not inclusive of tax.

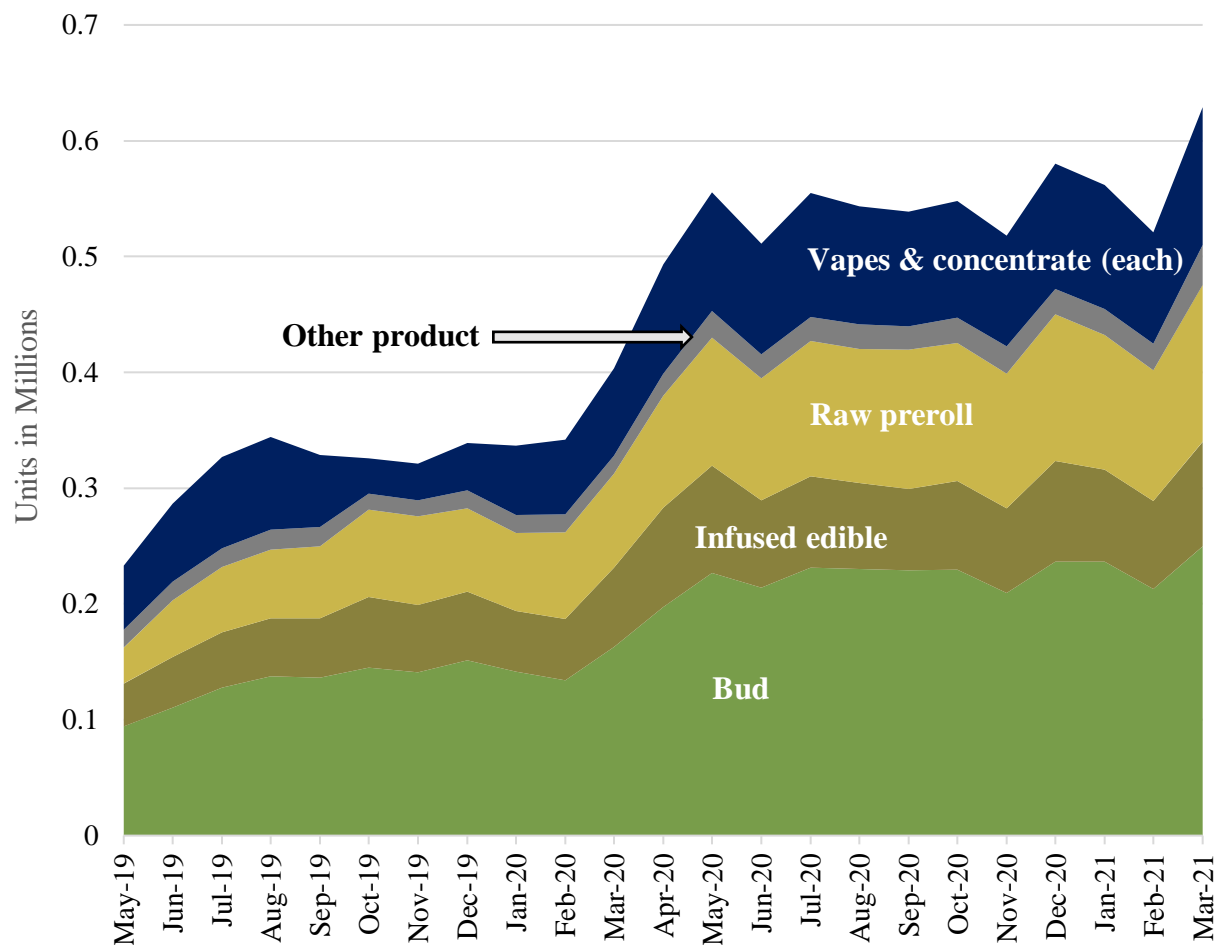
Other products include: Concentrate, Infused (nonedible), Infused Beverage, Infused Pre-rolls, Kief, Shake/trim, Shake/trim (by strain), and Suppository.

Tables 3 and 4 show medical product units by product category per month. Units refer to each package sold (e.g., one package of edibles) or each “unit” of bud (i.e., 1 gram of strain A and 1 gram of strain B is two units while 2 grams of strain A is one unit.). Table 3 shows the total units by product category per month. Table 4 shows the percentage that each product category made up of the total units of cannabis product sold in the medical cannabis market per month.

In May 2019, vapes and concentrate (each) made up 24% of total units sold, and in May 2020, vapes and concentrate (each) made up 18% of total units sold. However, during the EVALI public health crisis and Commission quarantine on vape products [see [Section X. Methods for more detail](#)], vapes and concentrates as a percentage of total units sold fell to between 9-12% from October 2019 through December 2019.

In May 2019, buds made up 41% of total cannabis units sold, and in May 2020, buds also made up 41% of total units sold. During the same time points, edibles made up 16% (May 2019)-17% (May 2020) of units sold. Raw pre-rolls made up 13% (May 2019) to 20% (May 2020) of units sold.

Table 3. Monthly Medical Units Sold by Product Type (millions)



Notes:

From top to bottom: blue shaded section represents products classified as vapes or concentrate (each), gray shaded section represents products classified as other product [see note below], yellow shaded section represents products classified as raw pre-rolls, brown shaded section represents product classified as infused edibles, and green shaded section represents products classified as buds.

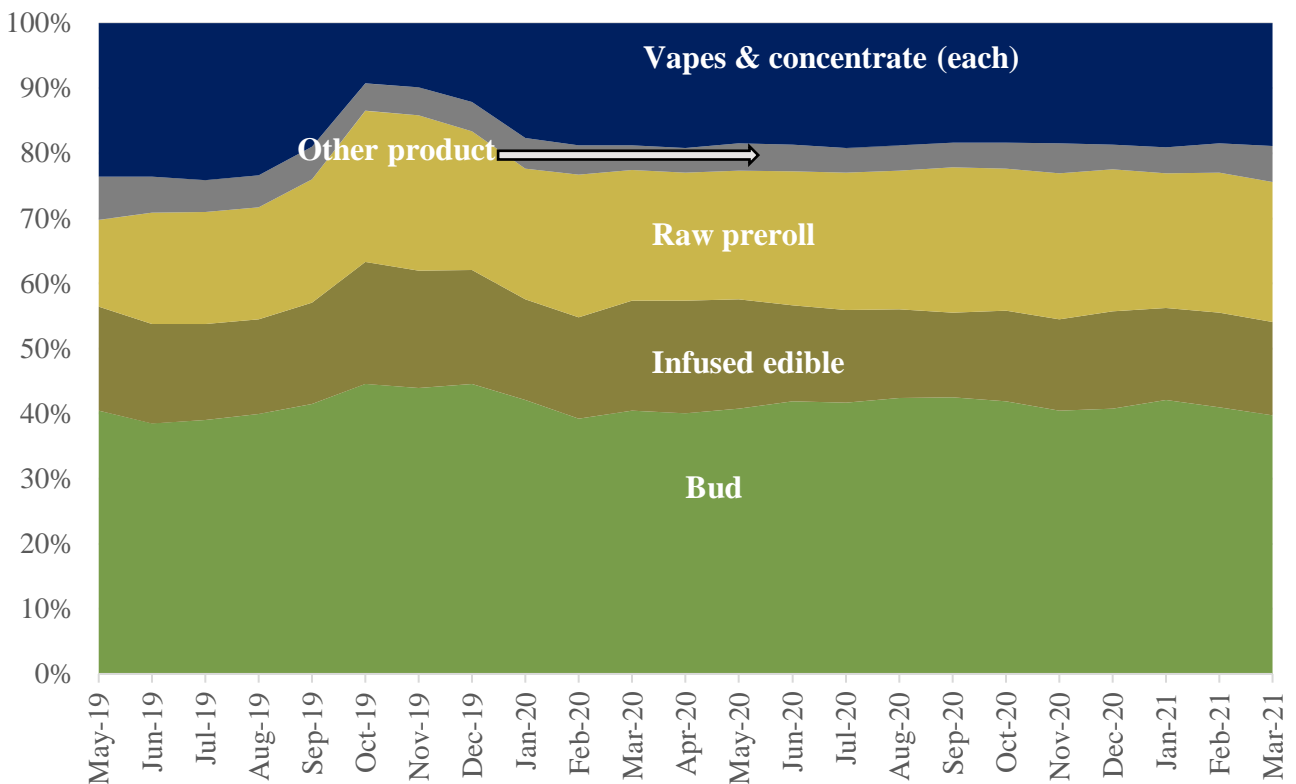
Raw pre-rolls category began to be used in March 2019, and April 2019 was the first month it was used for the entirety of the month.

Vape products category began to be used in December 2019.

Sales are not inclusive of tax.

Other products include: Concentrate, Infused (nonedible), Infused Beverage, Infused Pre-rolls, Kief, Shake/trim, Shake/trim (by strain), and Suppository.

Table 4. Percent of Total Monthly Medical Units by Product Type



Notes:

From top to bottom: blue shaded section represents products classified as vapes or concentrate (each), gray shaded section represents products classified as other product [see note below], yellow shaded section represents products classified as raw pre-rolls, brown shaded section represents product classified as infused edibles, and green shaded section represents products classified as buds.

Raw pre-rolls category began to be used in March 2019, and April 2019 was the first month it was used for the entirety of the month.

Vape products category began to be used in December 2019.

Sales are not inclusive of tax.

Other products include: Concentrate, Infused (nonedible), Infused Beverage, Infused Pre-rolls, Kief, Shake/trim, Shake/trim (by strain), and Suppository.

Adult-use Sales

Tables 5 and 6 show adult-use sales by product category per month. Table 5 shows the total sales in millions of dollars on the left Y-axis (vertical). For example, if there were 50 million sales in Month X, the highest point for the month on Table 5 would be level with 50 million and 100% on Table 6 would equal 50 million.

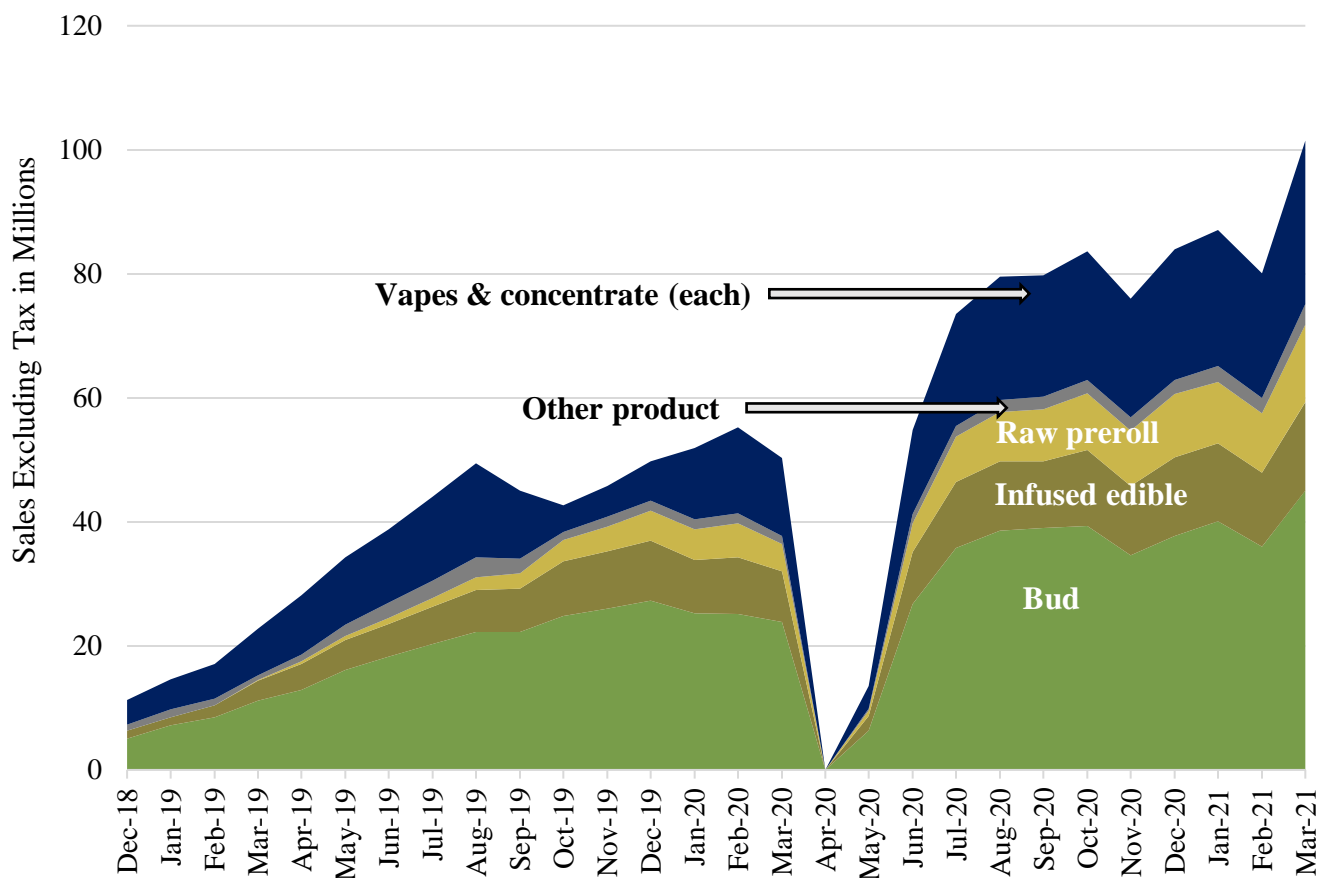
There were no sales in April 2019, due to a COVID-19-related emergency order which required adult-use retailers to temporarily halt sales.

Table 6 shows the percent that each product category made up out of the total dollars spent that month.

In December 2018, vapes and concentrate (each) made up 35% of total adult-use sales, and in December 2020, vapes and concentrate (each) made up 25% of total sales. However, during the EVALI public health crisis and Commission quarantine on vape products, vapes and concentrates as a percentage of total sales fell to between 10-13% from October 2019 through December 2019.

In December 2018, buds made up 45% of total adult-use cannabis sales, and in December 2020, buds also made up 45% of total adult-use sales. During the same time points, infused edibles made up 12% (December 2018)-15% (December 2020) of total sales. Raw pre-rolls made up 12% of sales in December 2020.

Table 5. Total Dollars Spent on Adult-use Cannabis by Product Type (in millions per month)



Notes:

From top to bottom: blue shaded section represents products classified as vapes or concentrate (each), gray shaded section represents products classified as other product [see note below], yellow shaded section represents products classified as raw pre-rolls, brown shaded section represents product classified as infused edibles, and green shaded section represents products classified as buds.

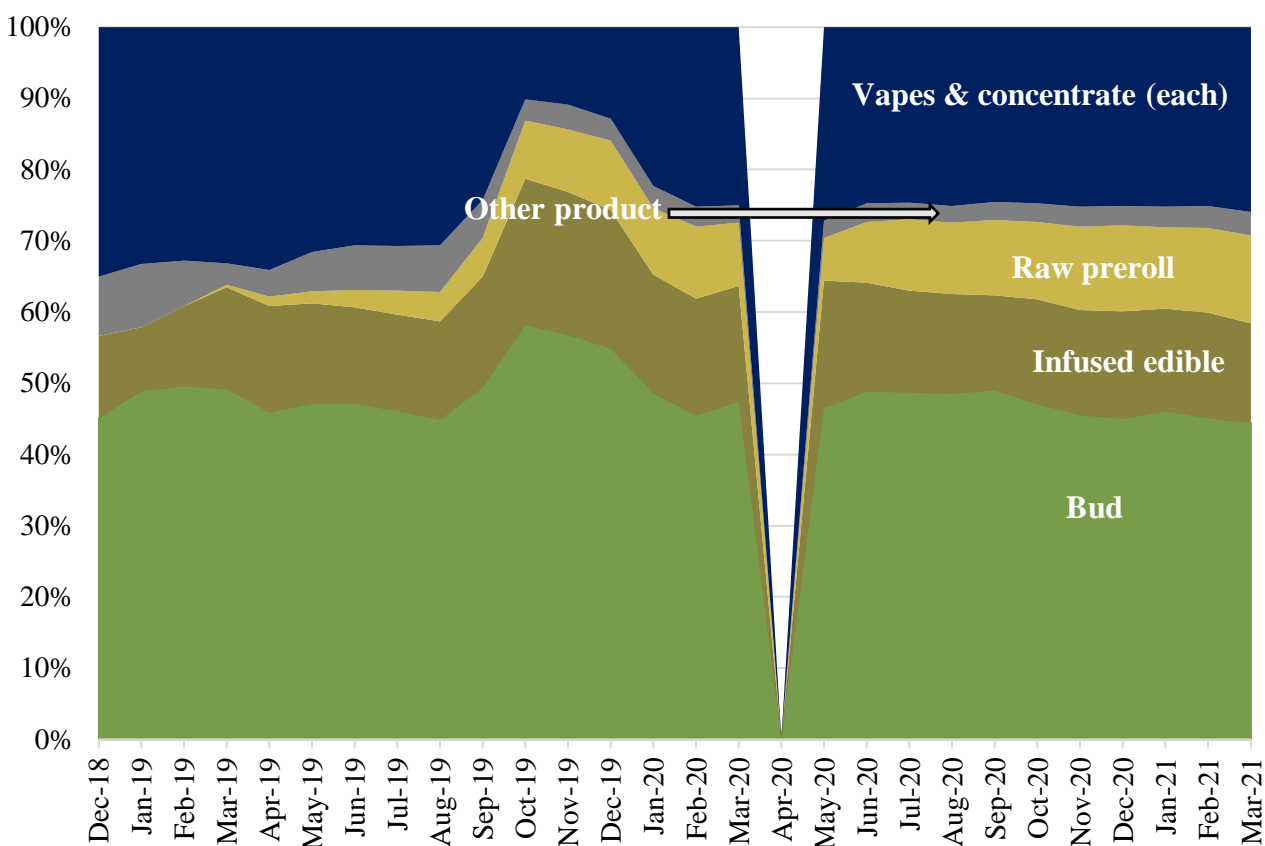
Raw pre-rolls category began to be used in March 2019, and April 2019 was the first month it was used for the entirety of the month.

Vape products category began to be used in December 2019.

Sales are not inclusive of tax.

Other products include: Concentrate, Infused (nonedible), Infused Beverage, Infused Pre-rolls, Kief, Shake/trim, Shake/trim (by strain), and Suppository.

Table 6. Percent of Total Monthly Adult-use Sales by Product Type



Notes:

From top to bottom: blue shaded section represents products classified as vapes or concentrate (each), gray shaded section represents products classified as other product [see note below], yellow shaded section represents products classified as raw pre-rolls, brown shaded section represents product classified as infused edibles, and green shaded section represents products classified as buds.

Raw pre-rolls category began to be used in March 2019, and April 2019 was the first month it was used for the entirety of the month.

Vape products category began to be used in December 2019.

Sales are not inclusive of tax.

Other products include: Concentrate, Infused (nonedible), Infused Beverage, Infused Pre-rolls, Kief, Shake/trim, Shake/trim (by strain), and Suppository.

For comparison to the timeframes reported in medical-use results section: in May 2019, vapes and concentrates (each) made up 32% of sales and in May 2020, vapes and concentrate (each) made up 27% of sales.

Tables 7 and 8 shows adult-use product units by product category per month. Units refer to each package sold (e.g., one package of edibles) or each “unit” of bud (i.e., 1 gram of strain A and 1 gram of strain B is two units while 2 grams of strain A is one unit).

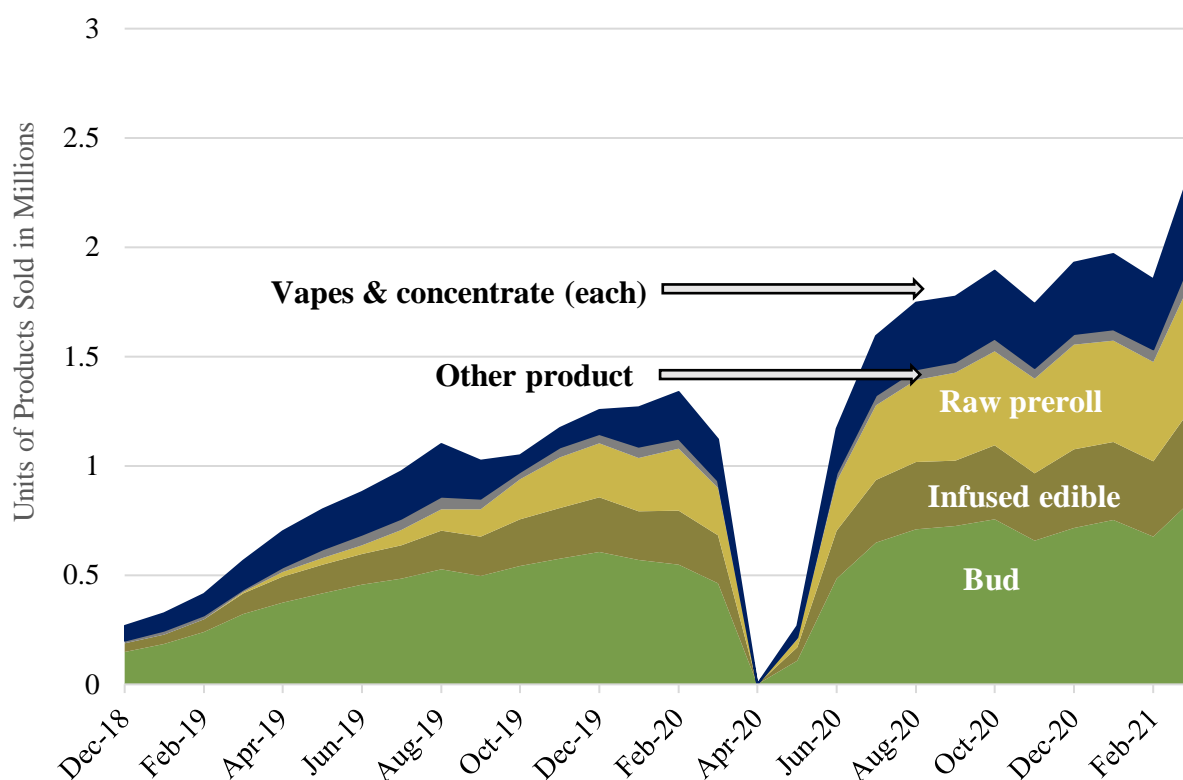
Table 7 shows the total units by product category per month. Table 8 shows the percentage that each product category made up of the total units of cannabis product sold in the legal non-medical adult-use cannabis market per month. There were no units of cannabis products sold in April 2019, due to a COVID-19-related emergency order which required adult-use retailers to temporarily halt sales.

In the non-medical adult-use market, the percentage of units sold that are buds have declined since 2018. In December 2018, buds made up 55% of total cannabis units sold, and in December 2020, buds made up 37% of total units sold.

In December 2018, vapes and concentrate (each) made up 25% of total units sold, and in December 2020, vapes and concentrate (each) made up 17% of total units sold. However, during the EVALI public health crisis and Commission quarantine on vape products [see [Section IX. Methods](#)], the percent that vapes and concentrates made up of total units sold fell to between 7-9% from October 2019 through December 2019.

In December 2018, infused edibles made up 15% of total units sold, and in December 2020, infused edibles made up 19% of total units sold. In December 2020, Raw pre-rolls made up 25% of units sold.

Table 7. Total Cannabis Units by Product Type (in millions per month)



Notes:

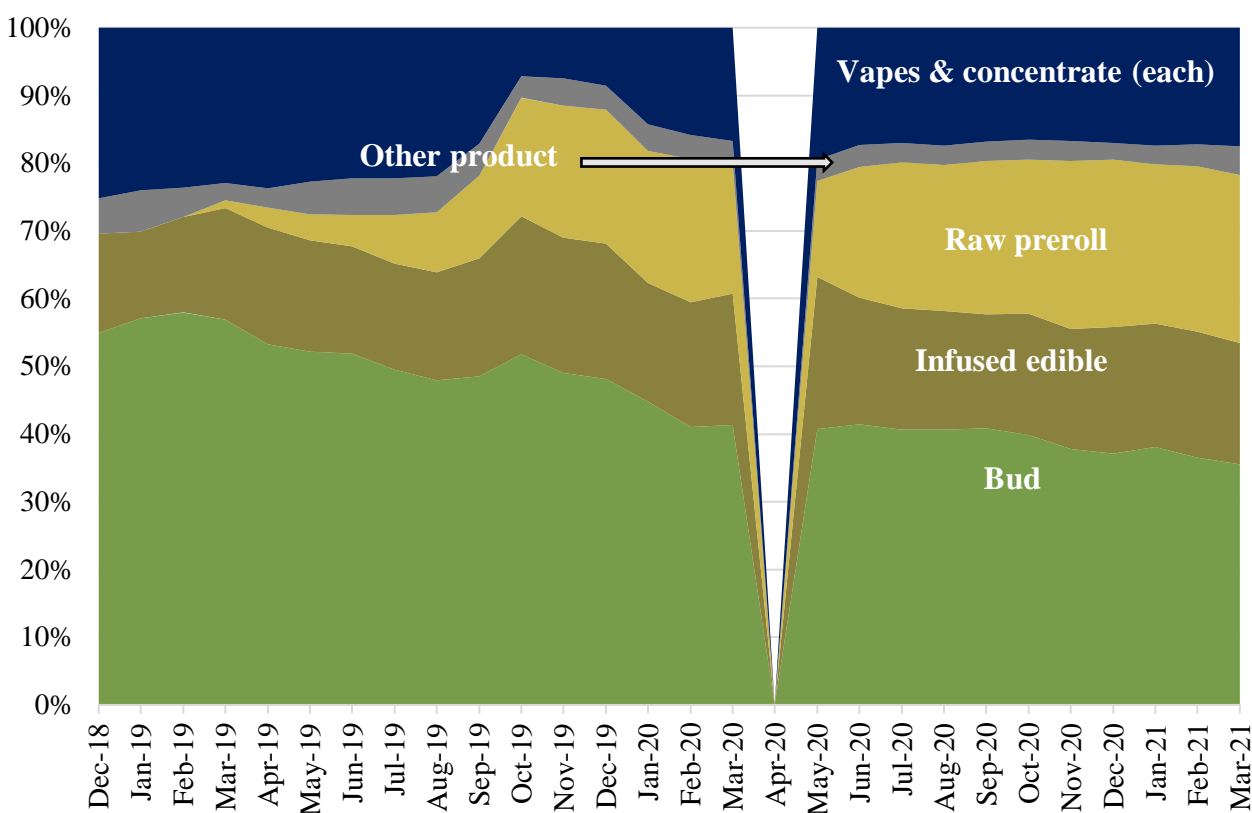
From top to bottom: blue shaded section represents products classified as vapes or concentrate (each), gray shaded section represents products classified as other product [see note below], yellow shaded section represents products classified as raw pre-rolls, brown shaded section represents product classified as infused edibles, and green shaded section represents products classified as buds.

Raw pre-rolls category began to be used in March 2019, and April 2019 was the first month it was used for the entirety of the month.

Vape products category began to be used in December 2019.

Other products include: Concentrate, Infused (nonedible), Infused Beverage, Infused Pre-rolls, Kief, Shake/trim, Shake/trim (by strain), and Suppository.

Table 8. Percentage of Total Units of Cannabis Product Sold by Product Type (per month)



Notes:

From top to bottom: blue shaded section represents products classified as vapes or concentrate (each), gray shaded section represents products classified as other product [see note below], yellow shaded section represents products classified as raw pre-rolls, brown shaded section represents product classified as infused edibles, and green shaded section represents products classified as buds.

Raw pre-rolls category began to be used in March 2019, and April 2019 was the first month it was used for the entirety of the month.

Vape products category began to be used in December 2019.

Sales are not inclusive of tax.

Other products include: Concentrate, Infused (nonedible), Infused Beverage, Infused Pre-rolls, Kief, Shake/trim, Shake/trim (by strain), and Suppository.

XI. Literature Overview — THC Health Effects

The purpose of this section is to identify studies and reports about the effects of high THC cannabis on the human body in medical and adult-use contexts. Literature includes both peer-review scientific articles and gray literature, such as government reports.

Medical Cannabis

At the time of this report in May 2021, 36 states, D.C., and four territories have some form of legal cannabis use (medicinal or adult-use).¹⁵ The increase in availability of cannabis products has created further need to research and assess the efficacy of cannabis use for medicinal purposes, including consideration of specific THC and CBD concentrations.³⁰ The most comprehensive review of the evidence regarding the health effects of cannabis was published in 2017 by the National Academies of Sciences, Engineering, and Medicine. The report “*[The Health Effects of Cannabis and Cannabinoids: The Current State of Evidence and Recommendations for Research](#)*” considered 10,700 abstracts on the effects of medicinal cannabis for a variety of diseases, illnesses, and disorders. The authors then narrowed down the abstracts by quality and date published.²¹

Researchers found approximately 100 different conclusions after extensive review of the relevant literature. The findings were separated into categories depending on the weight of evidence, including: Conclusive Evidence; Substantial Evidence; Moderate Evidence; Limited Evidence; and No or Insufficient Evidence to Support the Association. The authors formulated four recommendations based on the collection of evidence. The first recommendation states that to develop comprehensive evidence, public agencies, philanthropic and professional organizations, private companies, and clinical and public health research groups should provide funding and support for a national cannabis research agenda. The second recommendation seeks to improve research quality by suggesting that the U.S. Department of Health and Human Services (HHS), NIH, and CDC jointly fund a workshop to develop a set of research standards. The third recommendation asks for improved surveillance capacity. Finally, the authors suggests that the CDC, NIH, and FDA address the barriers to this realm of research.²¹

As a result of the gaps in research on health effects of cannabis and cannabinoids, we do not draw a conclusion regarding the effects of high THC medical cannabis on the human body [see [Section VIII. Medicinal Cannabis Research Considerations](#)], and instead offer considerations to increase research capacity [see [Section XV. Considerations](#)].

Non-medical Adult-use Cannabis

The average THC concentration in cannabis increased in past decades,^{12,31} although major variation in products and raw plants exist.³² Studies of legal cannabis identify an early trend

toward increasing THC concentrations in flower.²⁷ For example, Jikomes and Zoorob found that in Washington's legal market, THC concentration in flower increased from 2014 to 2015, then stabilized from 2015 to 2017.¹³ Concentrates from cannabis flower did not show a trend toward increasing THC concentration after 2015.¹³

Researchers also identify a shift in market share toward cannabis product types with traditionally higher THC concentrations (i.e., inhalable extracts or concentrates increasing in market share) and a decreasing market share of flower.^{2,13,27,28,33} Thus, Commission staff conclude that there is substantial demand for cannabis products with high THC content.

Next, Commission staff assessed relevant literature reviews and gray literature reports examining high THC cannabis products and health effects [see [Section XVII. Appendix Tables 1 and 2](#)]. We framed this review by using the Lower Risk Cannabis Use Guidelines, a public health tool based on systemic literature reviews.³⁴ These guidelines identify that the use of lower THC cannabis products and products with a high CBD:THC ratio as one evidence-based strategy to reduce cannabis-related harms.

High THC content products are generally associated with higher risks of various (acute and chronic) mental and behavioral problem outcomes. For public health, clinical health, and safety, users should know the nature and composition of the cannabis products, and ideally use cannabis products with low THC content. Given the evidence of CBD's attenuating effects on some THC-related outcomes, it is advisable to use cannabis containing high CBD:THC ratios. [Evidence Grade: Substantial.]³⁴

Staff identified two high-quality government reports assessing THC in products in Colorado and Washington State. The Colorado report concluded:

Evidence is moderate to strong concerning THC concentration and the association with mental health effects in adolescents, young adults and adults... Specific to THC concentrate products, evidence is insufficient when examining the association to dependence and acute health effects. Our ability to make unbiased, evidence-based statements on the potential health effects of marijuana products containing high THC concentration is limited until further scientific research can be conducted and the evidence shared or published. Therefore, in the best interest of public health, we suggest funding research to answer these questions.¹

The Washington report concluded:

Research available to date documents that THC content in cannabis products contributes to adverse health effects in a dose-response manner. This increased risk imposed from

using higher potency cannabis products is particularly concerning for young users and those with certain pre-existing mental health conditions. To further our understanding on the impact of high-THC content cannabis products, more research is needed.⁴

Regarding the requirement to examine whether THC concentration should be capped in cannabis and cannabis products, we reviewed articles for policy options and analysis pertaining to cannabis THC concentrations limits. In these reports, researchers identify multiple policy mechanisms that could impact THC concentrations in the legal market, including, tax based on concentration, concentration related price floors, THC concentration limits, initial restrictions on edibles and high-THC products, dose/serving size labeling requirements, and data collection requirements to monitor trends and harms.^{27,35} However, specific assessment of these policy options and potential unintended consequences have not been extensively studied; therefore, Commission staff do not find sufficient evidence to recommend a concentration cap, especially in light of potential unintended consequences discussed below.

XII. Illicit Market Considerations

Researchers are beginning to study regulatory options regarding concentration.³⁶ For example, Shover and Humphreys (2020), state that a concentration cap on products sold in the legal market could limit harms related to consumption of high-concentration products and development of new high-potent products until the science catches up with policy.³⁷ However, authors acknowledge that conversely, a concentration cap could incentive illicit market cannabis consumption and do not recommend a ban on certain product types.³⁷

As legal sales data from Washington, Oregon, Nevada, and Massachusetts show, there is substantial demand for high-THC concentration cannabis and product types.^{2,13,27,28,33} Restricting access in the legal markets could incentivize consumers to turn to the illicit markets. This could result in public health harms associated with unregulated and untested products in the illicit market (i.e., illegally produced and illegally sold “black market”). It could also negatively impact social equity effects through reliance on enforcement mechanisms to curb illicit market sales, such as fines and arrests.³⁸ Such harms may disproportionately impact people and communities most harmed by cannabis prohibition due to the racial and ethnic inequities in cannabis prohibition enforcement.

XIII. Limitations

There are many limitations to this report, which are outlined below.

Data and Analysis

This report includes only legal sales data on cannabis product types. There is no knowledge of what percentage of products under the “potentially high THC products” category, such as concentrates and vape products, are high THC. Importantly, the extent of the illicit market activity (i.e., legally produced but illegally sold “gray market” or illegally produced and sold “black market”) and home-grown products involving high THC cannabis products are unknown.

Literature

The peer-review literature is relatively sparse on the impact of high-THC cannabis on the human body. Beyond barriers to using cannabis for research, the makeup of cannabis, which includes over 100 chemical components, makes isolating the effect of one of these components, such as THC, difficult. Due to time, financial, and language restraints, this report reviewed English-language literature related to high-THC cannabis, but the Commission did not conduct a comprehensive literature review of all studies available. Nonetheless, the number of review articles and quality work from other governmental agencies (e.g., Colorado and Washington), provide strong overviews of the current evidence basis.

The major barriers to conduct cannabis research with products [see [Section VII. Challenges to Conducting Research with Cannabis](#)] are a contributing factor to this limited knowledge base. Gray literature, including governmental reports, complete some of these gaps but are limited by the lack of peer-review, sample size, and comparability.

XIV. Conclusion and Recommendation

After an assessment of the available Massachusetts data and current literature pertaining to the effects of high THC cannabis on the human body and concentration limits for consumption and manufacturing purposes, Commission staff find that evidence is not sufficient to recommend a specific concentration cap at this time [see [Section IX. Methods](#) and [Section X. Results](#)].

We additionally conclude that THC concentration in cannabis has increased and that there is substantial demand for cannabis products with high THC content in the legal markets. As a result of the gaps in the research, we do not draw a conclusion regarding the effects of high-THC medical cannabis on the human body [see [Section VIII. Medicinal Cannabis Research Considerations](#)]. Instead, staff offer considerations to increase research capacity [see [Section XV. Considerations](#)] for evidence-based decisions regarding THC limits in the future. Non-medical use of high THC products and greater doses of cannabis products by some populations appear associated with greater health and public safety risks than lower dose use; however, additional research is needed. Based on current finding, THC use presents some health risks for youth, and risks appear greater for youth using high-THC cannabis products.⁴

To address some current data limitations, Commission staff offer multiple considerations to increase data capacity [see [Section XV. Considerations](#)]. A reassessment may be warranted as the scientific evidence basis matures in the future as additional research is conducted.

XV. Considerations

Research Considerations

Policy preceding science is a fundamental limitation in the Commission’s ability to make evidence-based policy decisions. For this reason, below are key research considerations based on gaps in the current knowledge of THC concentration.

Consideration 1: Research could assess the newly enacted 5 milligram THC research dose with varying concentrations of other chemical components in cannabis plants, specifically CBD, to assess differential effects regarding interactions and cannabinoid ratios (“cannabinoid profiles”).^{10,20,39} [see [Section VII. Challenges to Conducting Research with Cannabis](#)].

Consideration 2: Research could assess how patients in the current regulated markets use medical cannabis for varying illnesses and symptoms, including dosage, modes of administration, THC concentration, and differential effects.²⁰ [see [Section VIII. Medicinal Cannabis Research Considerations](#)]. This assessment would both permit policymakers to better understand the concentration of products used by medical patients by their conditions and assist researchers in designing future studies.

Consideration 3: Researchers and clinicians could develop guidelines on how to administer medical cannabis of varying concentration, including indicators of potential side effects, and effectiveness for specified conditions.²⁰ [see [Section VIII. Medicinal Cannabis Research Considerations](#)]. It is also important to consider the labeling and packaging of products to ensure that patients understand the concentration dosage of their prescription. This would assist medical providers to be able to guide patients in more safe and effective ways to consume cannabis for medicinal treatment.

Consideration 4: Researchers could study policy mechanisms that could impact THC concentrations in the legal market, including tax based on concentration, concentration related price floors, THC limits, initial restrictions on edibles and high-THC products, dose or serving size labeling requirements, and data collection requirements to monitor trends and harms.^{27,35} [see [Section XI. Literature Overview—THC Health Effects](#)].

Consideration 5: Research could assess how THC concentration levels in the legal market(s) affect purchasing and consumption behaviors in both the legal and illicit markets [see [Section XIII. Limitations](#)]. This assessment would help guide policy decisions in harm reduction ways to

prevent adverse clinical and public health effects (i.e., prevent increased cannabis use disorders, cannabis induced psychosis, and health care utilization) and public safety effects (i.e., eliminating illicit market activity and prevent criminal justice incident inequalities).

Consideration 6: Alternative data sources, such as sales data and seed-to-sale data, could be used for future research. These metrics would provide a more accurate picture of how patients are using medicinal cannabis.

Policy and Regulatory Considerations

All States

Consideration 1: States enacting and implementing cannabis policies for medicinal and/or adult-use could implement effective seed-to-sale tracking to monitor legal cannabis throughout the production lifecycle, including testing of each batch’s cannabinoid profile, including THC concentration [see [Section IX. Methods](#)]. In regard to concentration, seed-to-sale tracking permits comprehensive monitoring of product purchase behaviors and sales, which helps facilitate research and guide policymakers and regulators on varying issues, including surveilling high concentration cannabis products through the legal supply chain, enforcing concentration-related regulations, collecting concentration-based taxes (if applicable), preventing high-concentration product diversion to youth, who may experience disproportionate harm from its use, and help to inform research to eliminate the illicit market²⁰ [see [Section VIII. Medicinal Cannabis Research Considerations](#)].

Consideration 2: Similar to Massachusetts, other states with comprehensive seed-to-sale tracking systems could consider building databases to allow for public health and safety purposes in addition to compliance purposes, like the Commission’s [Open Data Platform](#).

Consideration 3: Similar to New York, other states’ medicinal cannabis regulations could require that patients’ condition and symptoms are included in the seed-to-sale tracking system, which allows linkage of that information to medical cannabis purchasing behaviors.²⁰ This may help facilitate research, including assessment of effective THC concentration of cannabis products and modes of administration for treating specified illnesses and symptoms [see [Section VIII. Medicinal Cannabis Research Considerations](#)]. Additionally, platforms should track all concentration levels and pricing in order for research to better evaluate patient utilization.

Consideration 4: Recent research at Boston Children’s Hospital finds increased access/use of diverted medical market cannabis from the regulated market to youth in sample of youth in outpatient treatment for cannabis use in Massachusetts²⁴ [see [Section VIII. Medicinal Cannabis Research Considerations](#)]. To prevent this diversion, specifically for high-THC cannabis, which is more harmful to some youth (i.e., youth without medical need),⁴ states could limit high-THC

cannabis products in the medical market to specify efficacious medical conditions, such as cancer pain, to dispense high-THC cannabis to those within a specified age bracket, such as 18-21 or 18-25 [see [Section VIII. Medicinal Cannabis Research Considerations](#)]. To enact this, however, would require better research on which types of cannabis and cannabis products, and specified cannabinoid profiles, are advised for which medical conditions (see “Consideration 6”).

Consideration 5: States could license and regulate research facilities conducting research using the cannabis plant [see the Commission’s [Guidance on Licensure and Research License FAQ](#)]. The Commission licenses Marijuana Research Facilities as well as issues Research Permits (i.e., research projects to be conducted within the licensed facilities). This process could expedite research hindered by barriers to conducting research with cannabis from the only federally approved cultivator, the University of Mississippi.

Consideration 6: States could develop evidence-based cannabis prescribing guidelines for cannabis products based on the currently available scientific evidence and in collaboration with clinicians and cannabis researchers²⁰ [see [Section VIII. Medicinal Cannabis Research Considerations](#)]. This would permit more effective prescribing of products, including THC concentration, to medical patients with specified diagnoses, illnesses, and symptoms for which scientific studies have shown efficacy.

Consideration 7: States could implement additional taxes on non-medical, high-THC cannabis. This public health-based approach would theoretically disincentivize buyers from purchasing higher THC cannabis, potentially averting adverse effects of non-medical high-THC cannabis use; however, there are implementation challenges to this approach [see [Report, *Feasibility of Alternative Tax Schemes: A Legislative Report and Recommendation for Massachusetts*](#)].

Consideration 8: States could implement regulations to only permit high-THC cannabis products for medical patients, and more specifically for medical patients with specified diagnoses, illnesses, and symptoms for which scientific studies have shown efficacy; however, assessment(s) of unintended consequences is warranted [see [Section VIII. Medicinal Cannabis Research Considerations](#)]. Additionally, assessments of medical efficacy specifically for youth are warranted.

Massachusetts

Consideration 1: The Commission could change its data collection process to link cannabinoid concentrates to product sales, as the current mechanism requires hand-coding [see [Section IX. Methods and Section XIII. Limitations](#)]. Better linkage could enable precise research regarding the specific levels of THC, CBD, and other cannabinoids in products to accurately classify “high THC concentration” products.

Consideration 2: The Commission could work with its seed-to-sale tracking vendor to provide definitions for each of the cannabis product type classification categories which could increase data quality and reliability [see [Section IX. Methods](#)]. This would increase the utility of tracking data for research purposes.

Consideration 3: The Commission could continue its work to increase research capacity within the state, such as the implementation and regulation of Research Facility Licensing and Research Permits, and advocate for decreasing federal barriers in cannabis research.

Consideration 4: The Commonwealth could add the Marijuana Module to [BRFSS](#). There are costs associated with adding additional questions [see [Section IX. Methods](#)].

Consideration 5: The Commonwealth could add cannabis questions to [YRBSS](#) and [YHS](#). There are costs associated with adding additional questions [see [Section IX. Methods](#)].

Consideration 6: The Commonwealth could add cannabis questions to PRAMS. There are costs associated with adding additional questions [see [Section IX. Methods](#)].

Consideration 7: The Commonwealth could use industry seed-to-sale tracking data combined with the Regional Center for Poison Control and Prevention out of Boston Children’s Hospital to surveil both high THC concentration cannabis among youth and potential diversion from the legal medicinal market [see [Section VIII. Medicinal Cannabis Research Considerations](#)].

Consideration 7: Massachusetts could develop and add a section on high-THC cannabis products for inclusion in the Responsible Vendor Training (RVT) curriculum, notably, the Advanced Core Curriculum to be implemented in July 2022 [see [Section IX. Methods](#)].

Education Considerations

Consideration 1: Research shows that most cannabis consumers do not fully understand labeling and what constitutes high THC concentration products³ [see [Section IX. Methods](#)]. To increase understanding, the Commission could create additional public awareness materials or build upon its campaign, “More About Marijuana,” to educate consumers on what constitutes high-THC concentration cannabis.

Consideration 2: States’ medical societies (e.g., Mass Medical Society) and educational programs could add cannabis as medicine to clinical and training curriculums, ensuring providers are educated in the current state of data of cannabis efficacy and concentration [see [Section VIII. Medicinal Cannabis Research Considerations](#)].

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XVII. Appendix

I. Acronyms

Acronyms	Term
BRFSS	Behavioral Risk Surveillance Factor System
CBD	Cannabidiol
CDC	Center for Disease Control
COVID-19	Coronavirus Disease
CSA	The Federal Controlled Substances Act of 1970
D.C.	District of Columbia
DEA	U.S Drug Enforcement Agency
DPH	Department of Public Health
EVALI	E-Cigarette or Vaping Associated Lung Injury
FDA	U.S. Food and Drug Administration
HHS	U.S Health and Human Services
IRB	Internal Review Board
NIDA	National Institute on Drug Abuse
NIH	National Institute of Health
PRAMS	Pregnancy Risk Assessment Monitoring System
THC	Tetrahydrocannabinol
U.S.	United States
YMS	Youth Health Survey

II. Literature Search Tables

Table 1. Literature Search Results—THC Health Effects: Peer-reviewed literature reviews

Study	Methods	Outcomes	Findings	Limitations	doi
Increasing delta-9-tetrahydrocannabinol (Δ -9-THC) content in herbal cannabis over time: systematic review and meta-analysis. Cascini et al. 2012.	Literature review and meta-analysis	Cannabis THC concentrations	Cannabis potency is increasing.	Review is limited by inconsistencies across studies included (e.g., cannabis sample differences and methods differences).	10.2174/1874473711205010032
Changes in delta-9-tetrahydrocannabinol (THC) and cannabidiol (CBD) concentrations in cannabis over time: systematic review and meta-analysis. Freeman et al. 2020.	Literature review and meta-analysis	Cannabis THC and CBD concentrations	Cannabis THC concentrations have increased from 1970 to 2017. CBD concentrations have remained stable.	Limited data on CBD.	10.1111/add.15253
Cannabis Legalization and Acute Harms from High Potency Cannabis Products: A Narrative Review and Recommendations for Public Health. Matheson and Le Foll 2020.	Literature overview	Examined impacts of cannabis product diversification	Authors provide three approaches to minimize harm: (1) early restriction of cannabis edibles and high-potency products; (2) clear and consistent labelling that communicates dose/serving size and health risks; (3) implementation of robust data collection frameworks to monitor harms	Review is limited by gaps in the literature	10.3389/fpsyt.2020.591979
Cannabis Potency and Contamination: A Review of the Literature. McLaren et al. 2008	Literature review	Examined cannabis potency and contamination	Cannabis potency in the U.S. has increased. There is wide variation in product potency. Studies that report CBD find lowered CBD levels. Mixed evidence for titration patterns.	Studies do not always report CBD levels; and The sample sizes of cannabis products may not be representative.	10.1111/j.1360-0443.2008.02230.x
What Do You Know About Maryjane? A systematic review of the current data on the THC:CBD ratio. Zeyl, et al. 2020	Literature review	Literature regarding THC:CBD ratios, percentages, and/or weighted amounts	THC:CBD ratios included – 1:0, 22:1, 2:1, 1:1, 1:6, 1:9, 1:20, 1:33, 1:50, and 0:1. No substantive conclusions can be drawn from current literature.	Relatively few studies meeting inclusion criteria. Current research limited by lack of blinding.	10.1080/10826084.2020.1731547

Biomarkers for the effects of cannabis and THC in healthy volunteers. Zuurman, et al. 2008	Literature review	Asses which biomarkers are found useful in early cannabinoid drug development, and how cannabis affects different central nervous system functions	Cannabis/THC affected a wide range of Central Nervous System domains. Some CNS domains showed indications of depression at lower potency and stimulation at higher potency.	Test standardization needed	10.1111/j.1365-2125.2008.03329.x
Cannabis Use and its Association with Psychological Disorders. Urtis, et al. 2020.	Literature Review and Meta-Analysis	Connections between Cannabis Use and various mental illnesses such as psychosis, depression, and anxiety	“Cannabis Use disorder is highly prevalent in individuals with mental illness”, Connections between cannabis use and psychosis, depression, and anxiety require further investigation.	“It may possible to conduct structured studies of cannabis dosage in patients using medical cannabis.”	Cannabis Use and its Association with Psychological Disorders (nih.gov)
Medical cannabis and mental health: A guided systematic review	Literature Review and Meta-Analysis	“Considers the potential influences of the use of cannabis for therapeutic purposes on areas of interest to mental health professionals”	Cannabis has potential for the treatment of PTSD and substance abuse disorders. Cannabis use does not appear to increase risk of harm to self or others. More research is needed to characterize the mental health impact of medical cannabis.	None listed.	10.1016/j.cpr.2016.10.002

Table 2. Literature Search Results—THC Health Effects: Gray literature

Report	Potency definition	Sample	Methods	Relevant outcomes assessed	Findings	Link
THC Concentration in Colorado Marijuana: Health Effects and Public Health Concerns. <i>Colorado Department of Public Health and Environment (CDPHE)</i> (2020).	“THC potency” is interpreted as THC concentration”	Colorado youth and adults	Prevalence and rate estimates of varying consumption outcomes; literature review	Poison control center exposures and associated product type; BRFSS method of use by product type and concentration; Literature review of health effects	Moderate evidence that individuals who use marijuana with THC concentration >10% THC are more likely than non-users to be diagnosed with a psychotic disorder, such as schizophrenia; Substantial evidence that THC intoxication can cause acute psychotic symptoms, which are worse with higher dose; Moderate evidence that adolescents/young adults who use marijuana with higher THC concentration (>10% THC) are more likely than non-users to continue use; Moderate evidence that adolescents/young adults who use marijuana with higher THC concentration (>10% THC) are more likely than non-users to develop future mental health symptoms and disorders; Insufficient evidence to determine whether or not the use of THC concentrates is more likely to result in adverse acute health effects than the use of other forms of marijuana; and Insufficient evidence to determine whether or not the use of THC concentrates is more likely to result in adverse acute health effects than the use of other types of marijuana.	https://www.thenmi.org/wp-content/uploads/2020/08/THC-Concentration-in-Colorado-Marijuana-CDPHE-8.3.2020.pdf
Cannabis Concentration and Health Risks: A report for the Washington State Prevention Research Subcommittee (PRSC). <i>Joint University of Washington and Washington State University Workgroup</i> (2020).	“Potency of cannabis is typically defined by the amount of THC within cannabis products, with varying cut-offs; and more recently by mode of cannabis administration of high THC potency manufactured products such as cannabis concentrates (wax, shatter), and liquid extracts used in vaping devices and infused edibles (candy or cookies).”	Washington adults and youth	Literature review and study overviews	Epidemiology of dabbing, vaping, edible behaviors; contaminants; observation study of real-world use; poison control center data; traffic safety; cannabis use disorder, potency and psychotic disorders; adolescent use; use during pregnancy	“THC content of cannabis products contributes to adverse health effects in a dose-response manner” Concentrate use in increasing in WA; High-potency cannabis use can have adverse lifelong effects; Youth are at particularly risk of adverse effects; Marginalized populations may be more adversely impacted; and Evidence of dose-response effect between THC concentration and health effects.	https://adai.uw.edu/wordpress/wp-content/uploads/2020/11/Cannabis-Concentration-and-Health-Risks-2020.pdf
The Health Effects of Cannabis and	“The amount of drug required to produce a	-	Literature review of various topics	Various health outcomes	National data on non-herb cannabis lacks	https://www.nap.edu/catalog/24625/the-health-effects-

Cannabinoids: The Current State of Evidence and Recommendations for Research. <i>National Academies of Sciences, Engineering, and Medicine</i> . (2017).	specific level of effect."					of-cannabis-and-cannabinoids-the-current-state
Cannabis Policy: Public Health and Safety Issues and Recommendations. <i>United States Senate Caucus on International Narcotics Control</i> . (2021).	-	-	Literature overview of various topics	Impacts of increasing cannabis potency	THC concentration in cannabis has increased products with high THC may be associated with acute intoxication, poison control calls, Cannabinoid Hyperemesis, emergency room visits, addiction and dependence, psychosis, increasing near-daily use. More research is needed on short and long-term effects of high THC cannabis.	https://www.drugcaucus.senate.gov/content/cannabis-policy-public-health-and-safety-issues-and-recommendations

Note: The Massachusetts Department of Public Health recommends the following reports for further background information:

- (1) [Marijuana Baseline Health Study \(2019\)](#);
- (2) [The Safety and Generally Recognized as Safe \(GRAS\) Status of the Proposed Use of Hulled Hemp Seeds in Human Food. https://www.fda.gov/files/food/published/GRAS-Notice-765.pdf](#);
- (3) [National Toxicology Program \(NTP\). Toxicology and Carcinogenesis Studies of 1-Trans-Delta9-Tetrahydrocannabinol. TR 446.](#)

Table 3. Legal sales data to examine market share and/or THC concentration

Article	State(s) and timeframe	Relevant methods	Relevant outcomes assessed	Findings	Limitations	doi
Variation in cannabis potency & prices in a newly legal market: Evidence from 30 million cannabis sales in Washington State. Smart et al. 2017.	Washington state (2014-2016)	Variation and potency trends (for flower and concentrate) assessed through descriptive statistics and linear regressions. Hedonic price regression to examine price relationships.	Product type variation and trends, potency variation and trends, impact of potency on price	Flower's market share has declined from 2014 to 2016, while cannabis extracts have increased; THC concentrations for flower are higher than illicit market estimates; High THC flower has increased in market share of flower products sold; and a one percentage point increase in THC potency associated with a 1–2% price increase.	Potency analysis for flower and inhalation extract only.	10.1111/add.13886
Big data on a big new market: Insights from Washington State's legal cannabis market Caulkins et al. 2018.	Washington state (2014-2016)	Descriptive statistics and data visualization methods.	Price across product types. Potency across product types. Market share of product types. Relationship between price and potency.	Average THC concentration for flower was 20%; Average concentration for extracts was 70%; and Wax/shatter/resin/dab segment showed fastest growth in WA market during study time frame.	No information about the consumer; and Potency levels for edibles not included due to inconsistent reporting.	10.1016/j.drugpo.2018.03.031
The Cannabinoid Content of Legal Cannabis in Washington State Varies Systematically Across Testing Facilities and Popular Consumer Products. Jikomes and Zoorob 2018.	Washington state (2014-2017)	Stains identified in seed-to-sale data matched to Leafly data and classified by chemotype.	THC and CBD concentrations in flower and concentrate product. Between lab differences in cannabinoid concentrations.	Of the three chemotypes, most WA legal cannabis falls in Chemotype 1 (i.e., high THC, low CBD); Measurement varies across testing labs; Mean THC flower increased from 2014-2015 and plateaued from 2015-2017; and Similarly, researchers find mean THC concentrates have not increased from 2015-2017.	Limited by quality and inconsistency of reporting in data accessed.	10.1038/s41598-018-22755-2
Price and product variation in Washington's recreational cannabis market. Davenport 2019.	Washington state (2014-2017)	Text-analytic methods to estimate potency for edibles and identify product subgroups.	Potency patterns and trends, including estimating potency for edibles.	Market share of flower is decreasing, while share for extracts is increasing; and High CBD chemotypes are increasing in popularity but are still uncommon.	Potency data reliability concerns; Data availability, present analysis limited to WA state only; and Data not available after 2017.	10.1016/j.drugpo.2019.08.004
How high: differences in the developments of cannabis markets in two legalized states. Firth et al. 2020.	Washington state (2014-2016) and Oregon (2016-2018)	Descriptive statistics and data visualization methods.	Product variety, product potency, price trends	Market share of flower decreased in WA and OR; and Cannabis products with high THC are cheaper than those with high CBD.	Data availability and comparability differences between states.	10.1016/j.drugpo.2019.102611

Availability, retail price and potency of legal and illegal cannabis in Canada after recreational cannabis legalization. Mahamad et al. 2020.	Canada (2018)	Descriptive statistics of retail data from retailer websites and Weedmaps.	Potency of legal and illicit products	Average THC concentrations is increasing; and On average, illicit herb was higher THC potency than legal herb.	Data was largely obtained through website review, accuracy was unknown.	10.1111/dar.13069
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CANNABIS CONTROL COMMISSION: FOURTH ANNUAL ACTIVITIES REPORT

October 14, 2021

Report as mandated by Chapter 55 of the Acts of 2017, *An Act
to Ensure Safe Access to Marijuana*



LEGISLATIVE MANDATE

Under Chapter 55 of the Acts of 2017, An Act to Ensure Safe Access to Marijuana (Act), the Cannabis Control Commission (Commission) is charged with implementing the statutory and regulatory schemes governing the adult-use, and now medical-use, marijuana programs. The following report is issued pursuant to Section 31 of the Act, which provides in relevant part:

“The commission shall annually submit a complete and detailed report of the commission’s activities, including a review of the implementation and enforcement of this chapter and the governance structure established in this chapter, not more than 90 days after the end of the fiscal year to the governor, the attorney general, the treasurer and receiver-general, the clerks of the house of representatives and the senate, the chairs of the joint committee on marijuana policy and the chairs of the house and senate committees on ways and means.” St. 2017, c. 55, § 31.

EXECUTIVE SUMMARY

Purpose

This report provides information regarding the implementation under the Act of the adult-use marijuana program pursuant to the aforementioned legislative mandate, inclusive of the medical-use program, which the Commission successfully transferred from the Department of Public Health on December 24, 2018.

Findings

The Commission continues to focus on the legislative mandate to implement the maturing adult-use marijuana and Medical Use of Marijuana Programs. To that end, the Commission continues to make significant progress in areas the Legislature identified and weathered the COVID-19 State of Emergency with minimal impact to internal and industry operations.



INTRODUCTION

On November 8, 2016, Ballot Question 4 “Legalize Marijuana” passed with 53.6% of the vote in the Commonwealth. At that time, Massachusetts joined seven other states, plus the District of Columbia, that had legalized marijuana for adult use (also known as recreational use). That number has since increased to 18 states as well as some territories. The resulting law in Massachusetts, Chapter 334 of the Acts of 2016, *The Regulation and Taxation of Marijuana Act*, which was amended by Chapter 55 of the Acts of 2017, *An Act to Ensure Safe Access to Marijuana*, delegated to the Commission initial oversight of the adult-use cannabis program as well as directed the transfer of the Medical Use of Marijuana Program from the Department of Public Health (DPH) to the Commission. In September 2017, the Governor, Treasurer, and Attorney General first appointed five Commissioners to serve in full-time positions for terms ranging from three to five years in accordance with statute. Executive Director Shawn Collins was unanimously appointed in November 2017 and the agency is currently staffed by 84 employees, including the Commissioners and Executive Director. In January 2021, the Commission onboarded three new Commissioners, Nurys Camargo, Bruce Stebbins, and Ava Callender Concepcion, followed by the onboarding of one additional Commissioner, Kimberly Roy, in July as the result of Commission vacancies created by term expirations or resignations. Chairman Steven J. Hoffman continues to fulfill his inaugural term.

The mission of the Commission is to honor the will of Massachusetts voters by safely, equitably, and effectively implementing and administering the laws enabling access to medical and adult-use marijuana in the Commonwealth.

The Commission continues to facilitate the creation of a safely regulated industry that creates entrepreneurial and employment opportunities and generates incremental tax revenues in and to communities across the Commonwealth—and already serves as a best practice model for other states. The Commission developed policies, procedures, and a regulatory structure to encourage and enable full participation in the marijuana industry by people from communities that were previously disproportionately harmed by marijuana prohibition and enforcement and positively impact those communities. The Commission has also built out data collection methods to monitor and measure progress toward statutory goals and objectives, most notably through an Open Data Platform. With these programs and regulations in place, the Commission continues to build an industry that prioritizes participation by small and large participants alike and with full participation by people of color, women, veterans, and Massachusetts farmers.

Due to the Commission’s investments in technology resources as a result of Legislative support, the Commission navigated the COVID-19 State of Emergency with minimal impact to external or internal operations. The agency successfully, and rapidly, pivoted to remote



operations to ensure the health and safety of staff and also amended external policies and procedures consistent with public health guidance to ensure the continued and sustained health and safety of patients, consumers, and industry personnel.

IMPLEMENTATION OF ADULT- AND MEDICAL-USE MARIJUANA PROGRAMS

Law

Statute. The Commission's enabling statute, M.G.L. c. 94G outlines Commission operations, the adult-use marijuana program and adult use applicant and licensee requirements. M.G.L. c. 94I outlines the Medical-Use Marijuana Program and its respective requirements. Effective December 11, 2020, M.G.L. c. 94G, was amended by St. 2020, c. 227, § 37 which allows Marijuana Establishments to cultivate, manufacture, sell or otherwise transact business with hemp and hemp products cultivated and manufactured under a Massachusetts Department of Agricultural Resources registration and in compliance with regulations set forth by the U.S. Department of Agriculture.

Promulgation of Regulations. On March 23, 2018, the first iteration of regulations, 935 CMR 500.000: *Adult Use of Marijuana*, were published in the Massachusetts Register. On December 24, 2018, the Medical Use of Marijuana Program successfully transferred from the Department of Public Health to the Commission, as was mandated by Section 64 of the Act. At that time, the Commission then promulgated 935 CMR 501.000: *Medical Use of Marijuana* and 935 CMR 502.000: *Colocated Adult Use and Medical Use Marijuana Operations*. Most recently, on January 8, 2021, the Commission promulgated amendments to 935 CMR 500.000: *Adult Use of Marijuana* and 935 CMR 501.000: *Medical Use of Marijuana*; and repealed 935 CMR 502.000: *Colocated Adult-use and Medical-use Marijuana Operations*, which was incorporated, as applicable, in 935 CMR 500.000 and 935 CMR 501.000.

Guidance. In addition to its regulations, the Commission regularly drafts and adopts guidance for licensing and other administrative processes implicated by its legislative mandate. To date, the Commission has published more than 30 guidance documents designed to assist consumers, patients, applicants, business owners, and local officials. Guidance documents are available at <https://mass-cannabis-control.com/guidancedocuments/>. Upon the promulgation of revised regulations in January 2021, the Commission has reviewed and revised or deployed additional public documents to assist the public. The Commission will continue to issue guidance documents from time to time as matters arise to aid the public with navigating and complying with the various regulations.

Licensing and Enforcement



Through the adult-use cannabis program, the Legislature required the Commission to certify priority applicants, license Marijuana Establishments, and register agents. To that end, the Commission and its vendors designed and implemented the Massachusetts Cannabis Industry Portal (MassCIP), its electronic registration system, and seed-to-sale tracking system, Metrc. As of January 2020, Medical Marijuana Treatment Center (MTC) application and licensing information also transitioned to an electronic-based process through MassCIP, as part of integrating the medical program that was previously administered by DPH into the Commission's operations. Applications for the Commission's Social Equity Program are also received and processed through the MassCIP.

Priority Applicants. Between April 17, 2018 and May 22, 2018, the Commission offered an application process for priority certification in accordance with the Act. In total, the Commission received 322 submitted applications, and ultimately granted priority certification to 81 MTC (formerly referred to as RMD) applicants and 122 economic empowerment applicants. As of September 1, 2021, the Commission has issued seven (7) commence operations approvals to economic empowerment priority applicants and eight (8) commence operations approvals to social equity program participants, enabling them to begin operating licensed Marijuana Establishment in the Commonwealth.

Provisional and Final Licensees. As of September 1, 2021, the Commission had received 1,263 license applications for adult-use Marijuana Establishments. Additionally, the agency had received 31,155 applications for Marijuana Establishment agent registration. Commission staff are presently reviewing 236 adult-use license applications and further reviewing and inspecting 472 provisional licensees. The following is a summary breakdown of the 1,233 Marijuana Establishment license applications fully submitted to the Commission as of August 5, 2021:

- 254 MTC Priority Applicants (which, according to the Act, is an MTC previously approved by DPH when it administered the Medical Use of Marijuana Program and had at least obtained an MTC provisional license as of April 1, 2018);
- 87 Economic Empowerment Applicants (as certified by the Commission in 2018 in accordance with mandated timeframe);
- 147 Social Equity Participant Applicants (as approved through the Commission's Social Equity Program);
- 390 Expedited Applicants (as allowed through Commission policy approved in November 2019 as part of a process for certain businesses to receive expedited review). These applicants consist of minority-, women-, and veteran-owned businesses as certified by the Supplier Diversity Office as well as Independent Testing Laboratories, Outdoor Cultivators, Marijuana Microbusinesses, and Craft Marijuana Cooperatives. Social Equity Program Participant Applicants also receive expedited review; and



- 532 General Applicants which do not meet any of the aforementioned criteria.

As of September 1, 2021, 289 licensees have received notices from the Commission that authorize them to commence business operations in the Commonwealth; another 58 entities currently possess final licenses, and 562 have been approved for provisional licenses. On August 31, Marijuana Establishments surpassed \$2 billion in retail and delivery sales since the first two adult-use retail stores opened in Massachusetts November 20, 2018.

In addition to regulating the adult-use cannabis industry in Massachusetts, the Commission has overseen the Medical Use of Marijuana Program since it was transferred from DPH in December of 2018 as required under the Act. As of September 1, 2021, the Medical Use of Marijuana Program is currently comprised of the following: 43 provisional licensees, 10 final licensees, and 83 additional licensees that have commenced full operations to serve registered qualifying patients and caregivers through vertically integrated MTCs. The Commission is currently reviewing four (4) MTC license applicants.

Communications

The Commission has maintained regular contact with members of the public through various media and platforms. Beyond their monthly public meeting schedule, Commissioners regularly attend and present at public events, which has continued remotely and in-person during the COVID-19 State of Emergency as appropriate. Departing and incoming Commissioners have made or participated in numerous presentations, speeches, panel discussions, and other forums before stakeholder groups such as community organizations, chambers of commerce, attorneys, municipal officials, industry groups, and law enforcement.

This spring, the Commission launched a revamped website at MassCannabisControl.com that incorporates medical- and adult-use cannabis program content on one platform for the first time to better serve all Commission constituents throughout the Commonwealth. New features of the enhanced website design include unique user-driven experiences using color-coded wayfinding and a range of visitor personas (e.g. patients, government officials, and parents); integrated web copy for improved searchability; stronger web accessibility standards; and embedded data compiled from external resources such as the Commission's [Open Data Platform](#) and new [Product Catalog](#). Since its launch in April, the new website has received more than 790,994 page views and 618,992 unique visits as of September 14, 2021.

From July 2020 through June 2021, the Commission sent, on average, 5 email campaigns to subscribers per month. The Commission's social media presence includes Instagram (@CannabisControlCommission, 2,850 followers) and LinkedIn



(@CannabisControlCommission, 3,561) in addition to Twitter (@MA_Cannabis, 8,668 followers) and Facebook (@MassCCC, 2,743 followers). Through these various channels, the Commission continues to communicate with the public regarding the work of the agency and its regulation of the developing industry.

Public Awareness Campaign

The Commission utilized organic promotion in FY21 to highlight the latest segment of its state-mandated public awareness campaign, More About Marijuana (www.MoreAboutMJ.Org). The campaign's educational messaging has been developed in partnership with MORE Advertising, and has previously utilized third-party research, surveys, and focus groups of Massachusetts residents to develop and implement content. Although More About Marijuana was not funded for FY21, Communications utilized this past April 20—a date often recognized by adult-use cannabis consumers—as [an opportunity to return the public's attention to the risks of consuming unregulated vaping products](#) following the vaping public health emergency, EVALI, that was declared in the Commonwealth and throughout the country during FY20.

As reported in previous legislative reports, the initial focuses of the Commission's public awareness campaign in 2018 and 2019 included youth prevention and responsible adult-use consumption. Additional materials have highlighted the [dangers of home manufacturing](#), COVID-19 safety tips for cannabis consumers, and the risks of vaping, in response to statutory requirements and health emergencies. Related print collateral and branded outreach materials remain accessible to the public through the Massachusetts Health Promotion Clearinghouse (<https://massclearinghouse.ehs.state.ma.us/category/Cannabis.html>). In FY20, the Commission's Communications and Research departments also spearheaded the release and review of pre-campaign surveys to inform potential direct-to-youth campaign messaging for future campaign segments that could enhance the campaign's ongoing focus on the risks of underage consumption.

Equity Programming and Community Outreach

The Commission continues to assess and build upon the nation's first statewide Social Equity Program (SEP). The Equity Programming and Community Outreach team is led by the Director of Equity Programming and Community Outreach, a redesigned role that will ensure a lens of equity is placed on the entirety of the Commission's work. The department has also expanded to include additional staff to support the agency's robust community outreach needs to Disproportionately Impacted Areas (DIA), the medical community, municipalities and government officials, academia, and other priority constituents.

The SEP is designed to build a pathway into the legal cannabis industry for individuals



disproportionately impacted by previous prohibition. The SEP focuses on those most impacted by the War on Drugs, marijuana prohibition, disproportionate arrest and incarceration, and provides training, technical assistance, and mentorship for entry into the regulated marketplace across four areas: entrepreneurship, entry- and managerial-level workforce and professional development, and ancillary business support. Its overall mission is to decrease the disparities in life outcomes for impacted individuals and improve the quality of life for those from DIAs. Commission staff have initiated a three-year strategic planning process to ensure the SEP continues to effectively meet its intended goals.

Both SEP Participants and Certified Economic Empowerment Applicants are eligible to jump the Commission's licensing queue when they submit a licensing application, receive certain fee waivers, and have exclusive access to Commission pre-certification and delivery and social consumption license types. As part of its latest regulatory review process, the Commission extended this exclusivity period from two years to three years. The agency also added new SEP criteria to expand participation to any individual listed as an owner on the original certification of a Certified Economic Empowerment Priority Applicant who satisfies certain criteria.

SEP Program goals are to:

- Reduce barriers to entry in the commercial marijuana industry, regardless of desired specialty within the industry;
- Provide professional and technical services as well as mentoring for individuals and businesses facing systemic barriers; and
- Promote sustainable, socially, and economically reparative practices in the commercial marijuana industry in Massachusetts.

To qualify for the Program, an applicant must meet one of the following criteria:

- Residency in an area of disproportionate impact for at least 5 of the past 10 years and income may not exceed 400% of the Area Median Income in the applicant's respective town/city;
- A past drug conviction, continuance without a finding, or an equivalent conviction in other jurisdictions, and residency in Massachusetts for at least the preceding 12 months;
- Marriage to, or the child of, a person with a drug conviction, a continuance without a finding, or an equivalent conviction in other jurisdictions, and residency in Massachusetts for at least the preceding 12 months;
- Any individual listed as an owner on the original certification of an Economic



Empowerment Priority Applicant who satisfies one or more the following criteria:

- Lived for five of the preceding ten years in an Area of Disproportionate Impact, as determined by the Commission;
- Experience in one or more previous positions where the primary population served were disproportionately impacted, or where primary responsibilities included economic education, resource provision or empowerment to disproportionately impacted individuals or communities;
- Black, African American, Hispanic, or Latino descent; or
- Other significant articulable demonstration of past experience in or business practices that promote economic empowerment in Areas of Disproportionate Impact.

The Commission opened the application for the SEP's first cohort in December of 2018 and approved 143 participants. Training launched in the summer of 2019 with three orientation seminars throughout the Commonwealth for accepted applicants.

Cohort Two doubled the number of SEP participants (285) and the Commission was able to deliver programming at a reduced cost, thanks in part to the new virtual environment. After programming began with an orientation seminar in July 2020, courses continued from fall 2020 through May 2021.

The Commission then opened the application for potential participants of Cohort Three in June 2021, with a submission deadline of this fall. At the time of this report, more than 500 individuals have applied to participate in the SEP. Currently, the agency is spreading awareness of the SEP's next cohort with an integrated communications and outreach campaign that includes paid advertising in community and ethnic media and on social media channels targeting audiences who are consistent with the SEP's eligibility criteria and teaching tracks.

Constituent Services and Government Affairs

The Commission ensures timely responses to all inquiries from the public. Constituents may email, call, or write the agency with their opinions, questions, comments, and concerns. The Commission receives more than 100 inquiries per day. The Director of Constituent Services liaises with other departments and staff to resolve constituent cases. Similarly, staff members under the Chief of Investigations and Enforcement regularly respond to questions about licenses and applications, compliance, ownership, suitability, and other matters related to operating businesses. Prior to the pandemic, staff also attended community meetings and other public events to ensure people can speak directly with Commission representatives. The most frequently received questions and comments typically pertain to the Medical Use of



Marijuana Program, compliance, marijuana policy, the legal industry, Marijuana Establishments, social equity, and related state laws.

The Commission is also in regular contact with the Legislature and Executive departments on a variety of topics. Most often, legislative offices are in contact with the Commission on behalf of their constituents. From time to time, however, the Commission will reach out to the Legislature to request insight and/or consideration of matters within the Legislature's purview (e.g. [Report on Host Community Agreements](#), funding for social equity applicants and licensees, and [Social Consumption](#)).

To underscore the importance of accessible and responsive government, Commissioners assigned the Executive Director a goal of staff achieving an initial response time of 24 hours for all inquiries.

Patient Support for Medical Use of Marijuana Program

On December 24, 2018, the Medical Use of Marijuana Program transferred from the Department of Public Health and fully integrated into the Commission. Commission staff routinely respond to patient inquiries in addition to processing patient, caregiver, and provider registrations.

As of September 2021, the Medical Use of Marijuana Program is comprised of 97,003 Certified Active Patients, 7,815 Active Caregivers and 358 Certifying Healthcare Providers. Staff in Constituent Services assist patients, caregivers, and providers with registration and troubleshoot technical issues.

Public Records and Transparency

During FY21, the Commission's Records Access Officer received and responded to approximately 150 requests for public records. Although certain materials are withheld subject to the statutory exemptions to mandatory public disclosure under G. L. c. 4, § 7 (26), the Commission's goal is to promote transparency. To that end, staff regularly post the following:

- Applications granted provisional and final licensure, including renewal applications, found at: <https://masscannabiscontrol.com/public-documents/licensing-decisions/>
- Executive summaries, public meeting minutes, and other materials presented during Commission public meetings, found at: <https://masscannabiscontrol.com/public-documents/>.



The Commission maintains its Open Data Platform, sourced through the seed-to-sale tracking system, in order to provide readily available data catalogs to the public, including data sets for Sales and Product Distribution, Agent Registration and Ownership, and Applications and Licenses. The Open Data Platform can be found at <https://opendata.mass-cannabis-control.com/>. In September 2021, the Commission added medical sales data and continues to explore more technological solutions to increase the public's access to Commission records.

Finance

Commission operations are supported through the Marijuana Regulation Fund, which is subject to appropriation. In FY21, the Legislature appropriated \$15.5 million in total for the Commission:

\$12.7 million for the Commission's Operations and \$2.8 million for the Medical Use of Marijuana Program. In total, the Commission spent \$11.3 in FY21. The Commission continues to grow, hire additional staff, and implement legislative mandates as the industry matures while generating surplus revenue for the Commonwealth.

For FY22, the Legislature appropriated a total of \$15.2 million for the Commission: \$12.4 million for the Commission's Operations and \$2.8 million for the Medical Use of Marijuana Program. These funding levels will support the Commission's staffing plan, including new Investigators, particularly those with a background in financial audits and forensic accounting; new Enforcement counsel staff to ensure that licensees remain in compliance; a Director of Testing to build upon the agency's internal knowledge base of laboratory testing and analyses protocols; and constituent services support staff. In addition, the FY22 budget will enable the Commission to implement internal operational enhancements and leverage external consultants for mission-critical projects across the agency, including IT, Investigations and Enforcement, Research, and Operations.

Revenue

The Commission's revenue from application, licensing, fines, and other fees, along with adult-use marijuana sales and excise tax revenue, is deposited into the Marijuana Regulation Fund. In FY21, the Commission collected \$25.1 million in revenue. Through May 2021, the Massachusetts Department of Revenue reported a total of \$59 million in marijuana sales tax revenue and \$95.7 million in marijuana excise tax revenue for FY21. In total, the Commission has generated a \$120.8 million contribution to the Marijuana Regulation Fund through fees and excise tax revenues.

Personnel



The Commission's Human Resources Department is responsible for creating and implementing policies, processes, and programs to support the Commission's mission, strategic vision, and efforts to create a great place to work. The Commission has a strong commitment to attracting, rewarding, developing, and retaining an inclusive, diverse, and talented workforce. At the time of this report, the Commission employs 84 staff of which 62% are female and 39% are persons of color. The agency's management team is 53% female and 47% persons of color. Human Resources has rolled out various employee programs to support staff and foster a community of engagement while working in a remote environment.

Research

The Commission's Research Department currently consists of a Director of Research and Project Coordinator and is in the process of rehiring a Research Analyst at the time of this report's drafting.

The Commission is required under Section 17(a) of G.L. c.94G to develop a research agenda to better understand the social and economic trends of cannabis in the Commonwealth. The law identifies at least seven categories of study and authorizes an expansion of that scope with the aim of informing future decisions that would aid in the closure of the illicit marketplace and monitoring the public health impacts of cannabis and cannabis legalization.

Research staff stratify categories of study into separate reports. Between July 1, 2020-July 1, 2021, the Commission released three comprehensive research reports (Table 1 below). All include original data analysis and extensive state-of-science literature reviews. The aims of each research report are fourfold: (1) establish a baseline prior to adult-use cannabis legalization to provide a point of reference for future years; (2) assess gaps in systematic data collection in the Commonwealth that is needed to fulfill the statutorily required annual research mandate; (3) discuss strategic plans for upcoming reports, and (4) present considerations for the Commonwealth based on a comprehensive assessment of items included in each report and as outlined [See Table 1 below for G.L. c.94G and St. 2017, c.55) research agenda items assessed and descriptions of each report].

Work is underway to disseminate two reports by January 2022, one assessing the science regarding effects of tetrahydrocannabinol ("THC") on the human body in response to St. 2017, c. 55, § 30 (f), and the second assessing Massachusetts data from the International Cannabis Policy Study, a collaboration with the University of Waterloo to better understand effects of cannabis laws across the U.S. and Canada. These agenda items will be included in the 2022 reports, scientific manuscripts, and national scientific meeting presentations. It is important to note that all one-time (i.e., non-ongoing) research agenda items enumerated in St. 2017, c.55 will be



complete by September 2021, including the final two reports in response to St. 2017, c.55 § 62 (“[Tax Study](#)”) and St. 2017, c.55 § 30(f) (“Potency Study” to be published in October 2021).

The Research Department continues to work internally, as well as collaborate with various state agencies, academic researchers, and other stakeholders to employ primary and secondary data collection methods to examine a spectrum of items. As cannabis policy research gains interest nationwide, the Commission set both long- and short-term goals to ensure its research is high-quality, impactful, comprehensive, and collaborative. Thus, in addition to research reports, the Department has also published six peer-review scientific articles and invited commentaries and presented research findings at national scientific conferences and academic institutions to advance the study of effects on cannabis laws. [See Table 2 below for Commission research scientific publications and Table 3 for Commission research presentations].

Commission Research

Table 1. Commission Research Reports, July 1, 2020-July 1, 2021

<p><u><i>Feasibility of Alternative Cannabis Tax Schemes: A Legislative Report & Recommendation for Massachusetts</i></u> [St. 2017, c. 55 § 63]</p>	<p>The Department in collaboration with Chief Operating Officer, Department of Revenue, and KPMG LLC., assessed the feasibility of alternative tax schemes on cannabis and cannabis products, including by weight, volume, and tetrahydrocannabinol potency in the Commonwealth.</p>
<p><u><i>A Baseline Review and Assessment of Adult and Emerging Adult Cannabis Use: High-Level Findings from the International Cannabis Policy Study (2018-2019) and Literature Review</i></u> [G. L. c. 94G, § 17 (a) (b)]</p>	<p>The Department in collaboration with Dr. Hammond, University of Waterloo, assessed emerging adult (16-20) and adult (>21) cannabis use and related behaviors from 2018-2019, including: cannabis use, mode of consumption, source of cannabis, ease of cannabis access, driving and riding behaviors, and perceptions of cannabis.</p>
<p><u><i>Identifying Disproportionately Impacted Areas by Cannabis Prohibition in Massachusetts. Worcester, MA. March 2021.</i></u></p>	<p>The Department in collaboration with the University of Massachusetts (University of Massachusetts Donahue Institute, University of Massachusetts Amherst, University of Massachusetts Lowell), and Johns Hopkins Bloomberg School of Public Health, assessed disproportionately impacted areas (DIAs) by the “War on Drugs” in Massachusetts.</p>



Table 2. Commission Research Scientific Publications, July 1, 2020-July 1, 2021

<p>Doonan SM., Hamilton JR., Johnson JK. Using National Incidence Based Reporting System (NIBRS) to Examine Racial and Ethnic Disparities in Cannabis Violations. Perspective Paper. The American Journal of Drug and Alcohol Abuse. Accepted July 22, 2020. https://doi.org/10.1080/00952990.2020.1803894</p>
<p>Kritikos AF, Hodgkin D, Johnson JK. Past 30-day marijuana vaping: Prevalence and predictors of use in a nationally representative study of U.S. youth. American Journal of Preventative Medicine. Accepted July 2020. Published https://www.sciencedirect.com/science/article/abs/pii/S0749379720303445</p>
<p>Johnson JK., Hodgkin D., Harris SK., Kritikos A, Doonan SM., Johnson RM. Medical marijuana laws (MMLs) and dispensary provisions not associated with higher odds of adolescent marijuana or heavy marijuana use: A 46 State Analysis, 1991-2015. Accepted January 2021, Substance Abuse Journal (Saj). https://www.tandfonline.com/doi/abs/10.1080/08897077.2021.1900986?journalCode=wsub20</p>
<p>Johnson JK., Doonan SM., Cannabis policy heterogeneity and effects on research—complexity expected. Scientific Commentary. Journal of American Medical Association (JAMA) Network Open. Accepted February 2021. To be published March 18, 2021. https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2777628?utm_source=twitter&utm_medium=social_jamajno&utm_term=4607477201&utm_campaign=article_alert&linkId=113751067</p>
<p>Doonan SM., Hamilton JR., Johnson JK. “Discussion of the National Incident-Based Reporting System’s (NIBRS) Potential to Assess and Monitor Cannabis Incident Disparities: Response to Drs. McCormack and Walfield” Scientific Commentary. American Journal of Drug and Alcohol Abuse (AJDAA). Accepted and Published February 2021. https://www.tandfonline.com/eprint/W5NQIHPWGR4AKYGUY/full?target=10.1080/00952990.2021.1881531</p>
<p>Das A., Johnson JK., Hard G., Jones AA. State Medical Marijuana Laws and Initiation of Cigarette Use among Adolescents in the U.S., 1991-2015. April 2021. Cannabis. DOI: 10.26828/cannabis/2021.01.004. https://publications.sciences.ucf.edu/cannabis/index.php/Cannabis/article/view/90/48</p>



Table 3. Commission Research Presentations, External, July 1, 2020-July 1, 2021

Johnson JK., Collins S., Doonan SM. Invited Lecture, Department of Social and Behavioral Sciences, Harvard T.H. Chan School of Public Health, Professor Rees Vaughan, Director, Center for Global Tobacco Control. Lecture Cannabis Policy and Research, 10/6/20.
Johnson JK., Doonan SM. 4/13/21, Invited Lecture, “Brown Bag Lunch.” University of Washington’s (UW), Alcohol and Drug Abuse Institutes (ADAI), 4/13/21.
Doonan SM., Laramie O., Liu J., Sarkis M., Johnson JK. Unexpected Public Health Emergencies—A Descriptive Analysis of Trends in the Massachusetts Medical-Use and Adult-Use Cannabis Markets. Research Society on Marijuana (RSMj) July 2021. Poster Presentation (virtual meeting, due to COVID).

Responsible Vendor Training (RVT)

Commission regulations 935 CMR 500.105(2)(b) and 935 CMR 500.105(2)(b) outline the Responsible Vendor Training (RVT) requirement for all current Marijuana Establishment and Medical Marijuana Treatment Center agents. The Research Department manages the RVT Program, including the application process, communication with applicants and current vendors, and any regulatory updates regarding RVT.

To date, the Commission has approved 20 applicants to be Certified RVT Vendors. Of the Certified Vendors, ten run their operations in Massachusetts while the remaining ten vendors operate outside of the state using either synchronous or asynchronous learning methods.

In 2021, the Research Department finalized [RVT Guidance](#) and [FAQ](#) documents to guide applicants through the RVT certification process. Additionally, an updated [RVT Checklist](#) was uploaded to the public documents section of the Commission’s website.

Office Space

In 2019, the Commission, through the Division of Capital Asset Management and Maintenance (DCAMM), moved to its Worcester headquarters and satellite office in downtown Boston to accommodate both the medical-use and adult-use cannabis programs. Also, in 2019, and as previously outlined, the Commission invested in computer hardware and transitioned



away from Mass.gov to an independent, secure system which enabled the Commission's agile and nimble COVID-19 response. The Commission has maintained remote operations for the entirety of FY21. Commission staff may utilize either of the Commission's office space as needed, subject to public health requirements. Commission staff, most notably compliance officers and investigators, also maintain a presence in the field through announced and unannounced inspections to ensure licensee compliance. Those staff take particular precautions to protect their own health as well as those they interact with.

COVID-19 Response

On March 12, 2020, the Executive Director closed the Commission's offices to staff and the public and directed all staff to work from home. Thanks to the aforementioned investments in IT and equipment, Commissioners and staff have been working remotely since March 13, 2020. During this time, the Commission continued to implement its spending and hiring plans, including welcoming twenty new hires while working remotely. At the time of this report, the Commission continues remote operations to better support staff health and safety. Staff remain dedicated to the Commission's mandate and have increased productivity over the course of the year.

For licensees, patients, and other constituents, the Executive Director issued updated administrative orders to extend virtual community outreach meetings, curbside pick-up, and telehealth visits with certifying providers to September 1, 2021, to transition the industry and public out of the declared State of Emergency while still being mindful of public health and safety. Recognizing ongoing risks related to the pandemic, orders permitting virtual community outreach meetings have since been extended to April 1, 2022, while MTC curbside operations and waivers authorizing patient telehealth visits for initial certifications with Certifying Healthcare Providers have been extended and will be reviewed by Commissioners for continued efficacy in January 2022.

Investigative and compliance staff started virtual inspections as well as in-person visits to continue carrying out the Commission's licensing and compliance responsibilities. The Commission required licensees to report COVID-19 cases at their facilities and document them using initial and subsequent incident reporting. For inspections that required onsite visits, licensees were required to complete a questionnaire to notify the Commission of confirmed cases within 24 hours of a visit.

Commission public meetings continue online, consistent and compliant with the Governor's executive order relative to the Open Meeting Law and the Legislature's enactment of Chapter 20 of the Acts of 2021. The Commission also created a [webpage specific to COVID-19 updates](#) and actions taken by the Commission in order to keep the public informed. The



Commission continues to receive, review, and process all license applications; in fact, in 2020, the Commission saw its highest number of provisional and final licensing applications.

CONCLUSION

This fourth annual report identifies the Commission's ongoing operations since its establishment as well as needs implicated by the continued growth of the regulated medical- and adult-use cannabis industry in Massachusetts. As this report demonstrates, the Commission has anticipated needs, created significant efficiencies, and continued to meet requirements outlined in statute.



Cannabis Control Commission

Job Description

Department: Administration and Programs

Reports To: Director of Constituent Services

Job Title: Constituent Services Manager

FLSA Status: Exempt

I. PURPOSE OF THE JOB

The Constituent Services Manager serves as key voice of the Commission, having frequent and essential contact (especially over the phone, but also via email and in person) with members of the Commission's constituency and the inquiring public. Reporting to the Director of Constituent Services, this role advances the Commission's reputation and brand, ensures consistent and accurate information sharing and messaging, and leaves a positive impression on the constituent.

II. ESSENTIAL FUNCTIONS AND RESPONSIBILITIES

- Manage Constituent Services staff as they perform a variety of tasks related to inbound and outbound calls and emails, including information requests, ensuring 100% accuracy, kind and responsive dialogue, and alignment with Commission policies;
- Follow Commission protocol when dealing with constituent requests, questions, and engagement;
- Research and resolve constituent inquiries and concerns with follow-up via telephone, email or written correspondence to ensure a quality response and alignment with Commission policy;
- Assist the Director of Constituent Services as necessary to provide accurate information and follow-up with constituents;
- Maintain a current set of FAQs and SOPs for all staff use, ensuring consistent and appropriate responses to constituent inquiries;
- Establish and enforce customer service standards for both quality and quantity of responses;
- Oversee management of constituent contacts and cases in the Commission's case management system;
- Ensure compliance with Commission protocol when dealing with constituent requests, questions, and engagement;
- Establish and maintain quarterly constituent services audit reports for quality assurance and quality control; and
- Coordinate with other Departments as necessary to provide accurate information and follow-up with constituents and internal data reporting.



III. OTHER DUTIES AND RESPONSIBILITIES

- Maintain the highest standards of personal, professional, and ethical conduct and support the Commission's goals for a diverse and culturally aware workforce;
- Understand and be able to explain the Commission's medical marijuana program, licensing, investigation, and enforcement processes; and
- Ability to meet expectations and accept personal responsibility for the work;
- Ability to work in a confidential manner and to handle sensitive information;
- Ability to think creatively, build constructive working relationships and resolve issues;
- Ability to collaborate with other departments and staff as needed; and
- Performs related duties as assigned.

IV. KNOWLEDGE AND SKILLS

- Organized self-starter and effective collaborator, showing strong interest in systems and process improvement;
- Ability to work effectively in a multi-disciplinary team and manage multiple projects;
- Ability to resolve conflicts in a professional manner;
- Knowledge of cannabis regulatory structure and various Massachusetts programs
- Cultural awareness, including correspondence with and about communities disproportionately harmed by cannabis prohibition;
- Strong interpersonal, verbal, and written communication skills with the ability to tailor information that establishes rapport and the ability to communicate and disseminate this information across the Commission;
- Ability to build constructive working relationships characterized by a high level of acceptance, integrity, cooperation, and mutual regard;
- Ability to work on multiple assignments; exercise good judgment in decision-making; meet deadlines; demonstrate attention to detail and be flexible;
- Ability to think critically and strategically;
- Ability to seek opportunities to resolve problems, achieve goals, or otherwise advance the Commission's mission;
- Ability to work in and travel to the Commission's headquarters in Worcester.

V. SUPERVISORY RESPONSIBILITIES

- The Constituent Services Manager will oversee the work of the Constituent Services Associate(s).

VI. EDUCATION AND EXPERIENCE

- Bachelor's degree in Business Administration or related field or equivalent experience required
- 5-7 years working in a high-volume atmosphere coordinating work in a constituent or customer service environment; and
- Experience supervising and reviewing the work of other employees

Salary Range: \$70,000 - \$80,000



[RESPONSIBLE VENDOR TRAINING VENDOR CERTIFICATION]: BARTUCCA CONSULTING

VENDOR OVERVIEW

Application Number:
RVR453123

Name and address of the Marijuana Establishment:
Bartucca Consulting

90 Tilting Rock Road,
Wrentham, MA 02093

Contact:
Anthony Bartucca
(774) 291-6260
ADB.BartuccaConsulting@gmail.com

RECOMMENDATION

Commission staff recommends Bartucca Consulting for renewal of their two-year certification to provide Responsible Vendor Training (RVT) with the following condition:

- All training materials reflect current Regulations 935 CMR 500.105(2) and 935 CMR 501.105(2).

This recommendation is based on review of required materials submitted to the Commission and stands as long as vendor remains in compliance with regulation provisions under 935 CMR 500.105(2) and 935 CMR 501.105(2).

EXECUTIVE SUMMARY

Bartucca Consulting is a renewal applicant that has been operating since October 2019. If renewed in Massachusetts, Bartucca Consulting plans to continue RVT in: a virtual learning environment, an in-person classroom, and in a live, online format. Since their initial certification, they have trained approximately 1400 Marijuana Establishment (ME) and Marijuana Treatment Center (MTC) Agents.

There have been no updates to their contact or ownership information. They have remained current with all regulatory changes and curriculum updates.

RECOMMENDATION IMPETUS

Bartucca Consulting provided the required information and materials required to sufficiently train ME and MTC Agents, including:

- Change of Ownership Information (if any);
- Change of Contact Information (if any);
- Any updates to the curriculum; and
- Compliance with Regulatory and Administrative updates since the vender's certification.

[RESPONSIBLE VENDOR TRAINING VENDOR CERTIFICATION]: CANNABIS TRAINERS

VENDOR OVERVIEW

Application Number:
RVR453121

Name and address of the Marijuana Establishment:
Cannabis Trainers
2745 W 35th Avenue
Denver, CO 80211

Contact:
Maureen McNamara
(303) 931-1111
Maureen@cannabistrainers.com

RECOMMENDATION

Commission staff recommends Cannabis Trainers for a renewal of their two-year certification to provide responsible vendor training with the following condition:

- All training materials reflect current Regulations 935 CMR 500.105(2) and 935 CMR 501.105(2).

This recommendation is based on review of required materials submitted to the Commission and stands as long as vendor remains in compliance with regulation provisions under 935 CMR 500.105(2) and 935 CMR 501.105(2).

EXECUTIVE SUMMARY

Cannabis Trainers is a renewal applicant that has been operating since October 2019. If renewed in Massachusetts, Cannabis Trainers plans to continue RVT training in: a virtual learning environment and in a live, online format. Since their initial certification, they have trained approximately 3700 Marijuana Establishment (ME) and Marijuana Treatment Center (MTC) Agents.

There have been no updates to their contact or ownership information. They have remained up to date with all regulatory changes and curriculum updates.

RECOMMENDATION IMPETUS

Cannabis Trainers provided the required information and materials required to sufficiently train ME and MTC Agents, including:

- Change of Ownership Information (if any);
- Change of Contact Information (if any);
- Any updates to the curriculum; and
- Compliance with Regulatory and Administrative updates since the vender's certification.

[RESPONSIBLE VENDOR TRAINING VENDOR CERTIFICATION]: MEDICAL MARIJUANA 411

VENDOR OVERVIEW

Application Number:

RVR453120

Name and address of the Marijuana Establishment:

Medical Marijuana 411

Contact:

Christine Nazareus

(720) 635-5244

Chris@medicalmarijuana411.com

RECOMMENDATION

Commission staff recommends Medical Marijuana 411 for a renewal of their two-year certification to provide Responsible Vendor Training (RVT) with the following condition:

- All training materials reflect current Regulations 935 CMR 500.105(2) and 935 CMR 501.105(2).

This recommendation is based on review of required materials submitted to the Commission and stands as long as vendor remains in compliance with regulation provisions under 935 CMR 500.105(2) and 935 CMR 501.105(2).

EXECUTIVE SUMMARY

Medical Marijuana 411 is a renewal applicant that has been operating since October 2019. If renewed in Massachusetts, Medical Marijuana 411 plans to continue RVT in a virtual learning environment. Since their initial certification, they have trained approximately 100 Marijuana Establishment (ME) and Marijuana Treatment Center (MTC) Agents.

There have been no updates to their contact or ownership information. They have remained current with all regulatory changes and curriculum updates.

RECOMMENDATION IMPETUS

Medical Marijuana 411 provided the required information and materials required to sufficiently train ME and MTC Agents, including:

- Change of Ownership Information (if any);
- Change of Contact Information (if any);

- Any updates to the curriculum; and
- Compliance with Regulatory and Administrative updates since the vender's certification.

[RESPONSIBLE VENDOR TRAINING VENDOR CERTIFICATION]: STOKER CONSULTING

VENDOR OVERVIEW

Application Number:
RVR453122

Name and address of the Marijuana Establishment:
Stoker Consulting
24 Blake Road
Lexington, MA 02420

Contact:
Richard Gilbert
(617) 620-9992
Rick@stokercompliance.com

RECOMMENDATION

Commission staff recommends Stoker Consulting for a renewal of their two-year certification to provide Responsible Vendor Training (RVT) with the following condition:

- All training materials reflect current Regulations 935 CMR 500.105(2) and 935 CMR 501.105(2).

This recommendation is based on review of required materials submitted to the Commission and stands as long as vendor remains in compliance with regulation provisions under 935 CMR 500.105(2) and 935 CMR 501.105(2).

EXECUTIVE SUMMARY

Stoker Consulting is a renewal applicant that has been operating since October 2019. If renewed in Massachusetts, Stoker Consulting plans to continue their training in both a virtual learning environment and in an in-person classroom setting. Since their initial certification, they have trained approximately 2000 Marijuana Establishment (ME) and Marijuana Treatment Center (MTC) Agents.

There have been no updates to their contact or ownership information. They have remained current with all regulatory changes and curriculum updates.

RECOMMENDATION IMPETUS

Stoker Consulting provided the required information and materials required to sufficiently train ME and MTC Agents including:

- Change of Ownership Information (if any);

- Change of Contact Information (if any);
- Any updates to the curriculum; and
- Compliance with Regulatory and Administrative updates since the vender's certification.

[RESPONSIBLE VENDOR TRAINING VENDOR CERTIFICATION]: QUALITY CONTROL ANALYTICS

VENDOR OVERVIEW

Application Number:

RVR453124

Name and address of the Marijuana Establishment:

Quality Control Analytics

P.O. Box 74

Assonet, MA 02702

Contact:

Ashley Boucher

(774) 328-0191

Consultant@qualitycontrolanalytics.com

RECOMMENDATION

Commission staff recommends Quality Control Analytics for a renewal of their two-year certification to provide Responsible Vendor Training (RVT) with the following condition:

- All training materials reflect current Regulations 935 CMR 500.105(2) and 935 CMR 501.105(2).

This recommendation is based on review of required materials submitted to the Commission and stands as long as vendor remains in compliance with regulation provisions under 935 CMR 500.105(2) and 935 CMR 501.105(2).

EXECUTIVE SUMMARY

Quality Control Analytics is a renewal applicant that has been operating since October 2019. If renewed in Massachusetts, Quality Control Analytics plans to continue their training in: a virtual learning environment, an in-person classroom setting, and in a live, online format. Since their initial certification, they have trained approximately 2100 Marijuana Establishment (ME) and Marijuana Treatment Center (MTC) Agents.

There have been no updates to their contact or ownership information. They have remained current with all regulatory changes and curriculum updates.

RECOMMENDATION IMPETUS

Quality Control Analytics provided the required information and materials required to sufficiently train ME and MTC Agents, including:

- Change of Ownership Information (if any);

- Change of Contact Information (if any);
- Any updates to the curriculum; and
- Compliance with Regulatory and Administrative updates since the vender's certification

Cannabis Control Commission

Monthly Public Meeting

October 14, 2021 at 10:00 a.m. via Microsoft Teams Live

Agenda

1. Call to Order
2. **Chairman's Comments and Updates**
3. Minutes for Approval
4. **Executive Director's Report**
5. Staff Recommendations on Changes of Ownership
6. Staff Recommendations on Renewals
7. Staff Recommendations on Final Licenses
8. Staff Recommendations on Provisional Licenses
9. Commission Discussion and Votes
10. New Business that the Chair did not Anticipate at the Time of Posting
11. Next Meeting Date and Adjournment



Executive Director's Report

Highlights from Licensing Data*

- 4 applications awaiting first review
- 17 applications for Commission consideration
- 32 applications awaiting supplemental review
- 97,158 certified active patients
- 687 Social Equity Applications

*Additional data available at the end of slide presentation



Licensing Applications | October 14, 2021

The totals below are all license applications received to date.

Type	#
Pending	226
Withdrawn	987
Incomplete (Less than 4 packets submitted)	7,016
Denied	4
Approved: Delivery Pre-Certifications	118
Approved: Delivery Endorsements	3
Approved: Licenses	928
Total	9,282

Licensing Applications | October 14, 2021

The totals below are number of licenses approved by category.

Type	#
Craft Marijuana Cooperative	3
Marijuana Courier	11
Marijuana Delivery Operator	0
Independent Testing Laboratory	14
Marijuana Cultivator	281
Marijuana Microbusiness	22
Marijuana Product Manufacturer	214
Marijuana Research Facility	0
Marijuana Retailer	373
Marijuana Third Party Transporter	4
Marijuana Transporter with Other Existing ME License	6
Total	928

* Additional data available at the end of slide presentation

Licensing Applications | October 14, 2021

The totals below are number of licenses approved by stage.

Type	#
Pre-Certified/Delivery Endorsed Microbusiness	120
Provisionally Approved	100
Provisional License	464
Final License	65
Commence Operations	300
Total	1,049

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

Licensing Applications | October 14, 2021

Status	#
Application Submitted: Awaiting Review	4
Application Reviewed: More Information Requested	174
Application Deemed Complete: Awaiting 3 rd Party Responses	31
All Information Received: Awaiting Staff Recommendation	17
Applications Considered by Commission <i>(includes Delivery Pre-Cert)</i>	1,053
Total	1,279



* Additional data available at the end of slide presentation

Licensing Applications | October 14, 2021

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

The 1,279 applications represent 717 separate entities

Type	#
MTC Priority	254
Economic Empowerment Priority	92
Expedited Review	400
General Applicant	533
Total	1,279

Expedited Applications	
Expedited: License Type	55
Expedited: Social Equity Participant	154
Expedited: Disadvantaged Business Enterprise	131
Expedited: Two or More Categories	60
Total	400

* Additional data available at the end of slide presentation

Licensing Applications | October 14, 2021

Of 1,049 applications approved by the Commission, the following applications have Economic Empowerment Priority Review, Social Equity Program Participant, and/or Disadvantaged Business Enterprise status. Please note, applicants may hold one or more statuses.

Type	Economic Empowerment	Social Equity Program	Disadvantaged Business Enterprise	TOTAL
Pre-Certified/Delivery Endorsed Microbusiness	29 (+2)	95 (+4)	14	138 (+6)
Provisionally Approved	6	19 (+7)	27 (+6)	52 (+13)
Provisional License	20 (+1)	29 (-4)	84	133 (-3)
Final License	2 (-1)	6 (+4)	11 (+2)	19 (+5)
Commence Operations	8 (+1)	9 (+1)	26 (+2)	43 (+4)
Total	65 (5.7%)	158 (15%)	162 (15.4%)	385 (36.7) % (+11%)

* Additional data available at the end of slide presentation

Licensing Applications | October 14, 2021

TYPE	PENDING APPLICATION	PRE-CERTIFIED/ ENDORSEMENT	INITIAL LICENSE DENIED	PROVISIONALLY APPROVED	PROVISIONAL LICENSE	FINAL LICENSE	COMMENCE OPERATION	T O T A L
Craft Marijuana Cooperative	2	-	0	1	2	0	0	5
Marijuana Courier License	8	-	0	1	4	2	4	19
Marijuana Courier Pre-Certification	10	73	-	-	-	-	-	83
Independent Testing Laboratory	6	-	0	1	5	1	7	20
Marijuana Cultivator	62	-	2	29	160	34	58	345
Marijuana Delivery Operator License	11	-	0	0	0	0	0	11
Marijuana Delivery Operator Pre-Certification	7	45	-	-	-	-	-	52
Marijuana Microbusiness	7	-	0	3	14	1	4	29
Marijuana Product Manufacturer	40	-	1	31	117	14	52	255
Marijuana Research Facility	7	-	0	0	0	0	0	7
Marijuana Retailer	61	-	1	31	160	13	169	435
Marijuana Transporter with Other Existing ME License	1	-	0	3	1	0	2	7
Microbusiness Delivery	0	2	0	0	0	0	1	3
Third Party Transporter	4	-	0	0	1	0	3	8
Total	226	120	4	100	464	65	300	1,279

Licensing Applications | October 14, 2021

The totals below are the number of cultivation licenses approved by stage.

TYPE	PENDING APPLICATION	PRE-CERTIFIED/ ENDORSEMENT	INITIAL LICENSE DENIED	PROVISIONALLY APPROVED	PROVISIONAL LICENSE	FINAL LICENSE	COMMENCE OPERATION	T O T A L
Marijuana Cultivator (Indoor)	50	-	1	28	147	23	50	299
Marijuana Cultivator (Outdoor)	12	-	1	1	13	11	8	46
Total	62	-	2	29	160	34	58	345

MMJ Licensing and Registration Data | October 14, 2021

*The numbers below are a snapshot of the program
for the month of September.*

MTC Licenses	#
Provisional	44
Final	8
Commence Operations	86
License Expired	41
Total	179

MMJ Program	#
Certified Patients	103,080
Certified Active Patients	97,158
Active Caregivers	8,117
Registered Certifying Physicians	285
Registered Certifying Nurse Practitioners	98
Ounces Sold	75,304

Licensing Applications | October 14, 2021

The totals below represent the number of applications processed by the Commission since 2018.

	2018	2019	2020	2021	TTD
Changes of Ownership	0	31	59	88	178
Changes of Location	11	16	14	17	58
Changes of Name	0	11	36	50	97
Tier Changes	0	0	15	12	27
Total	11	58	124	167	360

Commission Updates

- Telehealth Waivers
 - 26 waivers requested; 23 approved to date
 - 384 total certified providers
- Portuguese translations of the Commission's regulations and Guidance on Licensure now available at www.masscannabiscontrol.com



Updated MDAR Guidance on Hemp

- The Massachusetts Department of Agricultural Resources updated its hemp policies on October 4, 2021.
 - Allows the sale of raw hemp products and processed, but not final, hemp products to Marijuana Establishments.
 - If a Marijuana Establishment wants to manufacture products using hemp as an ingredient, an MDAR License may not be required. Further Commission guidance on this allowance necessary.
 - Final hemp products may be sold directly by Marijuana Retailers, including hemp flower.
- Commission **“Guidance for the Retail Sale of Hemp”** remains.
- We are assessing the implications of these updates for Commission licensees as well as options for the Commission.



Social Equity Program Update

- The Commission has received **687** applications for Cohort 3 of the Social Equity Program
 - Application deadline extended until November 15th.
 - Original deadline was Friday, September 17th
 - With additional time, the Commission will continue to identify additional outreach opportunities to disproportionately impacted communities. These communities are based not only on geography, but demographics as well.
 - Applications will continue to be reviewed on a rolling basis through then, and once accepted, benefits (including access to exclusive license types) accrue immediately



Social Equity Program Applications | October 14, 2021

The totals below reflect the number of Social Equity Program Cohort 3 applications received and their current status.

Type	#
Approved	135
Pending	230
Reopened – More Information Requested	318
Withdrawn	4
Total	687

Social Equity Program: Total Applicants | October 14, 2021

Race	American Indian or Alaska Native	Asian	Black or African American	Declined to Answer	Hispanic, Latino, or Spanish	Middle Eastern or North African	Other	White
	5	22	382	20	109	14	6	129
Total (687)	.72%	3.20%	55.60%	2.91%	15.86%	2.03%	.87%	18.77%

Track Interest	Ancillary	Core	Entrepreneur	Entry	Declined to Answer
	30	70	545	42	0
Total (687)	4.36%	10.18%	79.33%	6.11%	0%

* Additional data available at the end of slide presentation

Social Equity Program: Total Applicants | October 14, 2021

Gender	Female	Male	User Defined	Declined to Answer
	214	464	5	4
Total (687)	31.14%	67.54%	.72%	.58%

Farmer Status	Yes	No	Declined to Answer
	51	636	0
Total	7.42%	92.57%	0%

Veteran Status	Yes	No	Declined to Answer
	35	652	0
Total	5.09%	94.9%	0%

* Additional data available at the end of slide presentation

Social Equity Program Applications: Approved Participants | October 14, 2021

Race	American Indian or Alaska Native	Asian	Black or African American	Declined to Answer	Hispanic, Latino, or Spanish	Middle Eastern or North African	Other	White
	1	5	67	5	16	0	3	38
Total (135)	.7%	3.6%	48.6%	3.6%	11.6%	0%	2.2%	27.5%

Track Interest	Ancillary	Core	Entrepreneur	Entry	Declined to Answer
	4	9	118	4	0
Total (135)	2.96%	6.66%	87.40%	2.96%	0%

* Additional data available at the end of slide presentation

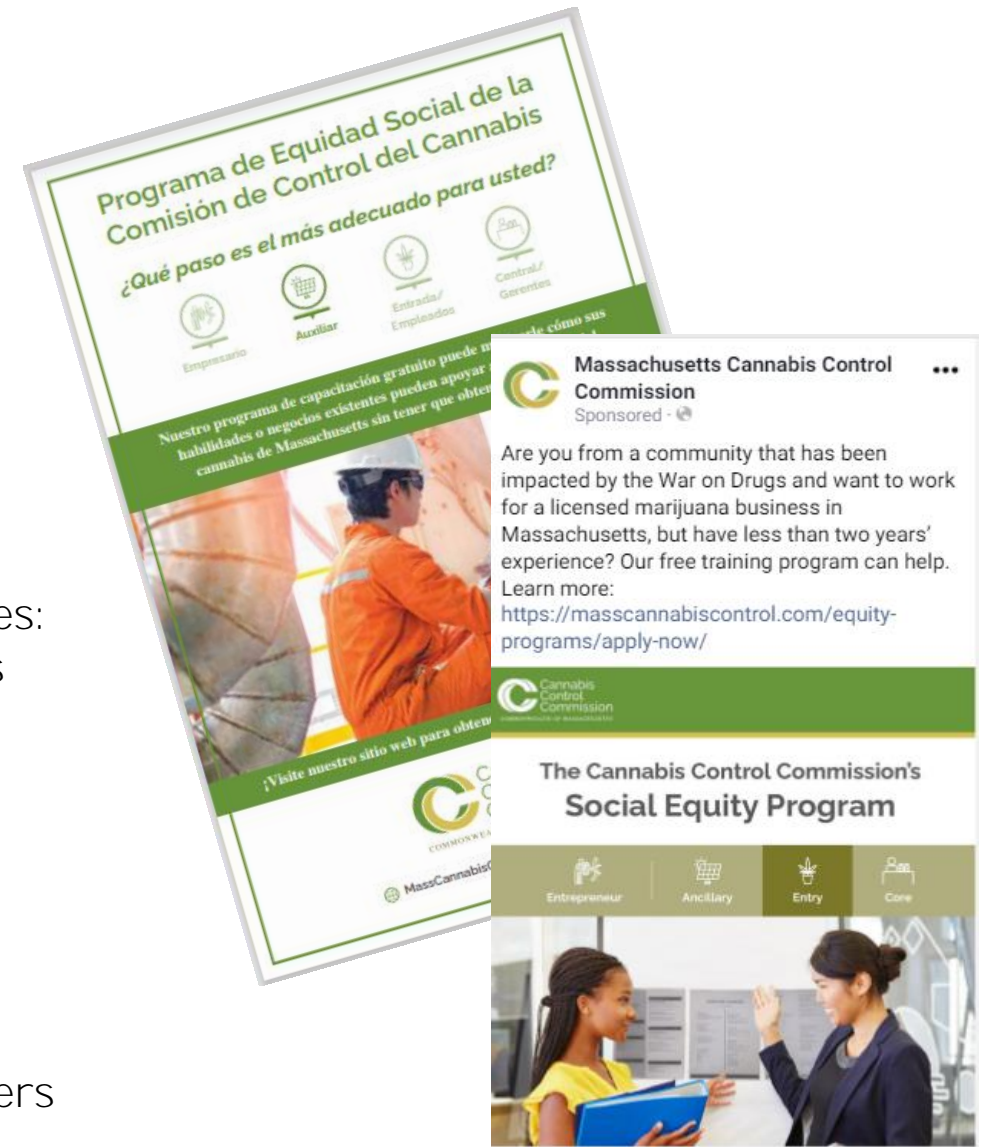
Gender	Female	Male	User Defined	Declined to Answer
	32	101	1	1
Total (135)	23.70%	74.81%	.74%	.74%

Farmer Status	Yes	No	Declined to Answer
	4	131	0
Total	2.96%	97.03%	0%

Veteran Status	Yes	No	Declined to Answer
	36	99	0
Total	26.66%	73%	0%

Social Equity Program Update

- \$12,300 integrated marketing campaign launched this summer to promote the open application for Cohort Three.
- Print and digital (24 outlets) and social media ads targeted audiences:
 - Located in Areas of Disproportionate Impact and communities ranked the most diverse places to live in the Commonwealth, including Lawrence.
 - With interests such as cannabis legalization, entry-level job searches, career changes, and industries tangential to the marijuana industry.
 - *El Pueblo Latino* and *Rumbo News* ran ads in Spanish.
- Ads emphasized Entry and Ancillary industry opportunities.
 - These tracks consistently garner the lowest application numbers each SEP application period.



Social Equity Program Update

- Commission-sponsored outreach events are being held in partnership with Elevate Northeast to increase access to the regulated cannabis industry and assist interested Cohort 3 applicants:
 - Job Fair: October 28, 2021 | 6:30 – 8:30 PM
 - SEP Application Workshop: November 4, 2021 | 6:30 – 8:30 PM
- For more information, please visit Elevate Northeast's website at elevatene.org.



Hiring Update

Constituent Services Associates Research Analyst

- Onboarded October 4th
-

Associate Enforcement Counsel Executive Assistant

- Final candidates' stage
-

Desktop Support Analyst

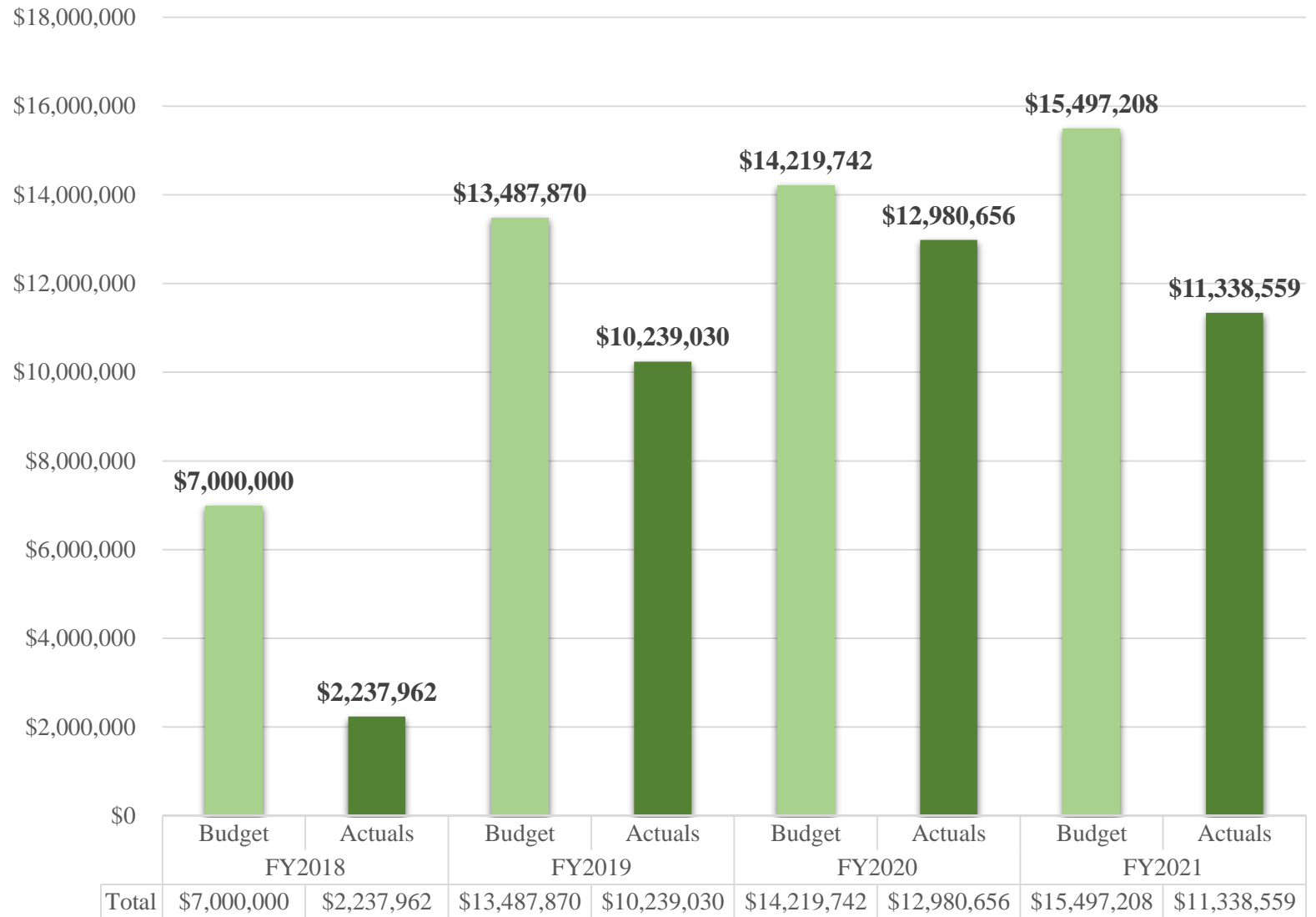
- Initial screening process stage
-

Director of Testing

- Position currently open and posted on the Commission's website



Total Budget vs. Actual Spending, FY2018-FY2021



Budget vs. Actual Spending by line item, FY2018-FY2021

Account	FY2018			FY2019			FY2020			FY2021		
	Budget	Actuals	% of Budget	Budget	Actuals	% of Budget	Budget	Actuals	% of Budget	Budget	Actuals	% of Budget
CNB Operations	\$5,000,000	\$2,237,962	45%	\$8,487,870	\$6,407,284	75%	\$9,952,761	\$9,189,535	92%	\$12,700,000	\$9,083,428	72%
Medical-Use of Marijuana	\$0	\$0	-	\$3,000,000	\$1,931,906	64%	\$3,266,981	\$2,801,009	86%	\$2,797,208	\$2,255,131	81%
Public Awareness Campaign	\$2,000,000	\$0	0%	\$2,000,000	\$1,899,840	95%	\$1,000,000	\$990,112	99%	\$0	\$0	-
Total	\$7,000,000	\$2,237,962	32%	\$13,487,870	\$10,239,030	76%	\$14,219,742	\$12,980,656	91%	\$15,497,208	\$11,338,559	73%

- FY2021 was a unique year. The FY2021 budget was enacted in December 2020, so the execution of available funds largely took place between January 2021 and June 2021.

FY2020 Actuals vs. FY2021 Actuals

Account & Category	FY2020 Actuals	FY2021 Actuals
CNB Operations	\$9,189,589	\$9,037,568
Administrative Expenses	\$690,486	\$263,647
Consultants & Contractors	\$619,248	\$234,989
Information Technology	\$2,075,265	\$1,871,092
Office Space	\$586,241	\$698,697
Payroll	\$4,939,668	\$5,782,503
Social Equity Contract	\$278,680	\$232,500
Medical-Use of Marijuana	\$2,801,009	\$2,255,131
Administrative Expenses	\$82,230	\$17,480
Consultants & Contractors	\$392,816	\$351,388
Information Technology	\$1,589,255	\$1,327,622
Payroll	\$737,542	\$558,641
Public Awareness Campaign	\$990,112	\$0
Contractor	\$990,112	\$0

Fee Collections, FY2018-FY2021


Revenue Source	FY2018	FY2019	FY2020	FY2021
MMTC Annual Registration		\$4,050,000	\$6,450,000	\$7,200,000
Patient Annual Registration		\$1,543,200	\$1,008,675	\$0
MMTC Architectural Review Fee		\$19,500	\$128,000	\$306,000
MMTC Location Change		\$70,000	\$90,000	\$20,000
MMTC Name Change		\$100	\$3,700	\$500
ID Card Replacement Fee		\$13,720	\$34,452	\$54,920
MMTC Agent Annual Registration		\$1,493,000	\$3,392,265	\$4,977,000
MMTC Phase 1 application		\$10,500	\$26,000	\$26,500
MMTC Phase 2 application		\$60,000	\$321,000	\$0
Penalties or Fines			\$475,000	\$1,239,500
Adult-Use Application and Agent Fees	\$36,225	\$461,101	\$1,447,353	\$3,498,888
Adult-Use Marijuana Retail License		\$345,000	\$1,424,790	\$3,178,000
Adult-Use Marijuana Products License	\$1,250	\$245,300	\$871,809	\$1,818,765
Adult-Use Marijuana Cultivator License	\$1,250	\$415,625	\$1,262,645	\$2,590,544
Adult-Use Marijuana Lab/Testing Facility		\$15,000	\$30,000	\$110,000
Marijuana Delivery License				\$20,897
MMTC Change in Building Structure Fee			\$3,000	\$10,000
MMTC Change in Ownership Fee			\$89,000	\$14,000
Total	\$38,725	\$8,742,046	\$17,057,689	\$25,065,514

FY2022 Budget

- The Legislature and Governor supported our request for FY2022 with a total of \$15.2M in appropriations.

Total Available Budgets, FY2018-FY2022

Account	FY2018	FY2019	FY2020	FY2021	FY2022
CNB Operations	\$5,000,000	\$8,487,870	\$9,952,761	\$12,700,000	\$12,420,669
Medical-Use of Marijuana	\$0	\$3,000,000	\$3,266,981	\$2,797,208	\$2,797,208
Public Awareness Campaign	\$2,000,000	\$2,000,000	\$1,000,000	\$0	\$0
Total	\$7,000,000	\$13,487,870	\$14,219,742	\$15,497,208	\$15,217,877



Staff Recommendations on Licensure



Staff Recommendations: Changes of Ownership

- a. Higher Purpose Corporation
- b. J-B.A.M., Inc.
- c. Tree Market Lynn, LLC
- d. Tree Market Taunton, LLC
- e. Van Garden Cannabis, LLC fka CannAssist, LLC



Staff Recommendations: Renewals

- a. 617 Therapeutic Health Care, Inc. (#MCR140031)
- b. BKPN LLC (#MRR205850)
- c. Buddies Ice Cream, Inc. (#MBR169274)
- d. Canna Provisions Inc. (#MCR140091)
- e. Canna Provisions Inc. (#MCR140093)
- f. Central Ave Compassionate Care, Inc. (#MCR140068)
- g. Central Ave Compassionate Care, Inc. (#MPR243667)
- h. Coastal Cultivars, LLC (#MCR140040)
- i. Curaleaf Massachusetts, Inc. (#MRR205868)
- j. Curaleaf Massachusetts, Inc. (#MCR140076)
- k. Curaleaf Massachusetts, Inc. (#MPR243677)
- l. Deerfield Naturals, Inc. (#MCR140087)
- m. Deerfield Naturals, Inc. (#MPR243683)
- n. Deerfield Naturals, Inc. (#MRR205877)
- o. Four Score Holdings LLC (#MCR140084)
- p. Four Score Holdings LLC (#MPR243681)
- q. Four Score Holdings LLC (#MRR205874)
- r. High Hopes (#MRR205856)
- s. Impressed LLC (#MCR140098)
- t. KRD Growers, LLC (#MPR243668)
- u. Liberty Market (#MRR205826)
- v. Mass Wellspring LLC (#MRR205878)
- w. Mill Town Agriculture, LLC (#MCR140102)
- x. ReLeaf Alternative Inc. (#MRR205881)
- y. The Blue Jay Botanicals, Inc. (#MRR205833)
- z. The Green Harbor Dispensary, LLC (#MRR205879)
- aa. Theory Wellness, Inc. (#MCR140069)
- bb. Theory Wellness, Inc. (#MPR243669)
- cc. Theory Wellness, Inc. (#MRR205859)

Staff Recommendations: Renewals

dd. ACK Natural, LLC (#RMD1627)
ee. Alternative Therapies Group, Inc. (#RMD1530)
ff. Apothca, Inc. (#RMD345)
gg. Bask, Inc. (#RMD445)
hh. Cultivate Leicester, Inc. (#RMD3193)
ii. HVV Massachusetts, Inc., Vertically Integrated Medical
Marijuana Treatment Center
jj. HVV Massachusetts, Inc. (#RMD1185)
kk. Life Essence, Inc., Vertically Integrated Medical
Marijuana Treatment Center (Holyoke – Cambridge)
ll. Life Essence, Inc., Vertically Integrated Medical Marijuana
Treatment Center (Holyoke – Holyoke)
mm. Life Essence, Inc. (#RMD1365)
nn. Middlesex Integrative Medicine, Inc. (#RMD1025)
oo. Nature Medicines, LLC (#RMD1045)
pp. FFD Enterprises fka PCMV (#RMD1165)
qq. Patriot Care Corp. (#RMD265)

rr. Patriot Care Corp. (#RMD727)
ss. The Green Harbor Dispensary, LLC (#RMD1305)
tt. The Heirloom Collective, Inc. (#RMD825)




Staff Recommendations: Final Licenses

- a. Ascend Mass, LLC (#MR282837), Retail
- b. Commonwealth Alternative Care, Inc. (#MR282339), Retail
- c. Hidden Hemlock, LLC (#MB281355), Microbusiness
- d. Mellow Fellows, LLC (#MR281811), Retail
- e. New England Treatment Access, LLC (#MR283065), Retail
- f. QPS Massachusetts Holdings, Inc. (#MC281517), Cultivation, Tier 3 / Indoor
- g. QPS Massachusetts Holdings, Inc. (#MP281696), Product Manufacturer
- h. The Botanist, Inc. (#MP281672), Product Manufacturer
- i. Uma Flowers, LLC (#MR283143), Retail
- j. New England Treatment Access, LLC (#RMD3028), Vertically Integrated Medical Marijuana Treatment Center



Staff Recommendations: Provisional Licenses

- a. 617 Therapeutics Health Care, Inc. (#MRN283963), Retail
- b. 620 Industries, Inc. (#MCN283511), Cultivation, Tier 1 / Indoor
- c. East Boston Local Roots, LLC (#MRN284117), Retail
- d. Faded, LLC (#MPN282090), Product Manufacturer
- e. Faded, LLC (#MXN281395), Transporter with Other ME License
- f. Fish Road, LLC (#MCN283477), Cultivation, Tier 6 / Indoor
- g. Forest Wilde, LLC (#MPN282058), Product Manufacturer
- h. Forest Wilde, LLC (#MRN284185), Retail
- i. GreenGrab, Inc. (#MDA1263), Marijuana Delivery Operator
- j. Highdration, LLC (#MPN282070), Product Manufacturer
- k. Highmark Provisions, LLC (#MCN283492), Cultivation, Tier 2 / Indoor
- l. KG Collective Brockton (#MRN281374), Retail
- m. Massachusetts Green Retail, Inc. (#MRN284144), Retail
- n. Standish Green Group, LLC (#MCN283502), Cultivation, Tier 3 / Indoor
- o. Standish Green Group, LLC (#MPN282080), Product Manufacturer
- p. The Green Lady Dispensary II, Inc. (#MRN284161), Retail
- q. Wise Man Genetics, LLC (#MBN281858), Microbusiness



The Commission is in recess

Commission Discussion & Votes



Commission Discussion & Votes

- Research Report: High Tetrahydrocannabinol (THC) Cannabis and Effects on the Human Body: More Research Needed
- Annual Activities Report
- Job Description: Constituent Services Manager
- Responsible Vendor Training Renewals
- Disproportionately Impacted Areas



High Tetrahydrocannabinol (THC) Cannabis and Effects on the Human Body: More Research Needed.

A Legislative Report and Considerations for Research and Policy.

Public Meeting of the Cannabis Control Commission:

October 14, 2021

Samantha M. Doonan, BA
Olivia Laramie, MA
Julie K. Johnson, PhD

Purpose of Study

“The commission shall investigate, in conjunction with the department of public health, the effects of marijuana and marijuana products with a high potency of tetrahydrocannabinol on the human body and recommend whether there should be restrictions on the potency of tetrahydrocannabinol in marijuana and marijuana products.”

St. 2017, c. 55, § 30 (f)



What is Potency?

- Potency refers to the amount of a substance needed to achieve a particular effect. However, the unique characteristic of cannabis means that there is no specific dose that can reliably achieve a particular effect across individuals.
- Thus, this report interprets Δ -Delta-9-Tetrahydrocannabinol (THC) “potency” as THC “concentration” or the THC content per volume (or weight of cannabis products), usually measured in milligrams or percentage.

Methods

- High-level literature overview:
 - Peer Review; and
 - Relevant “Gray Literature.”
- Commission Sales Data “Open Data.”

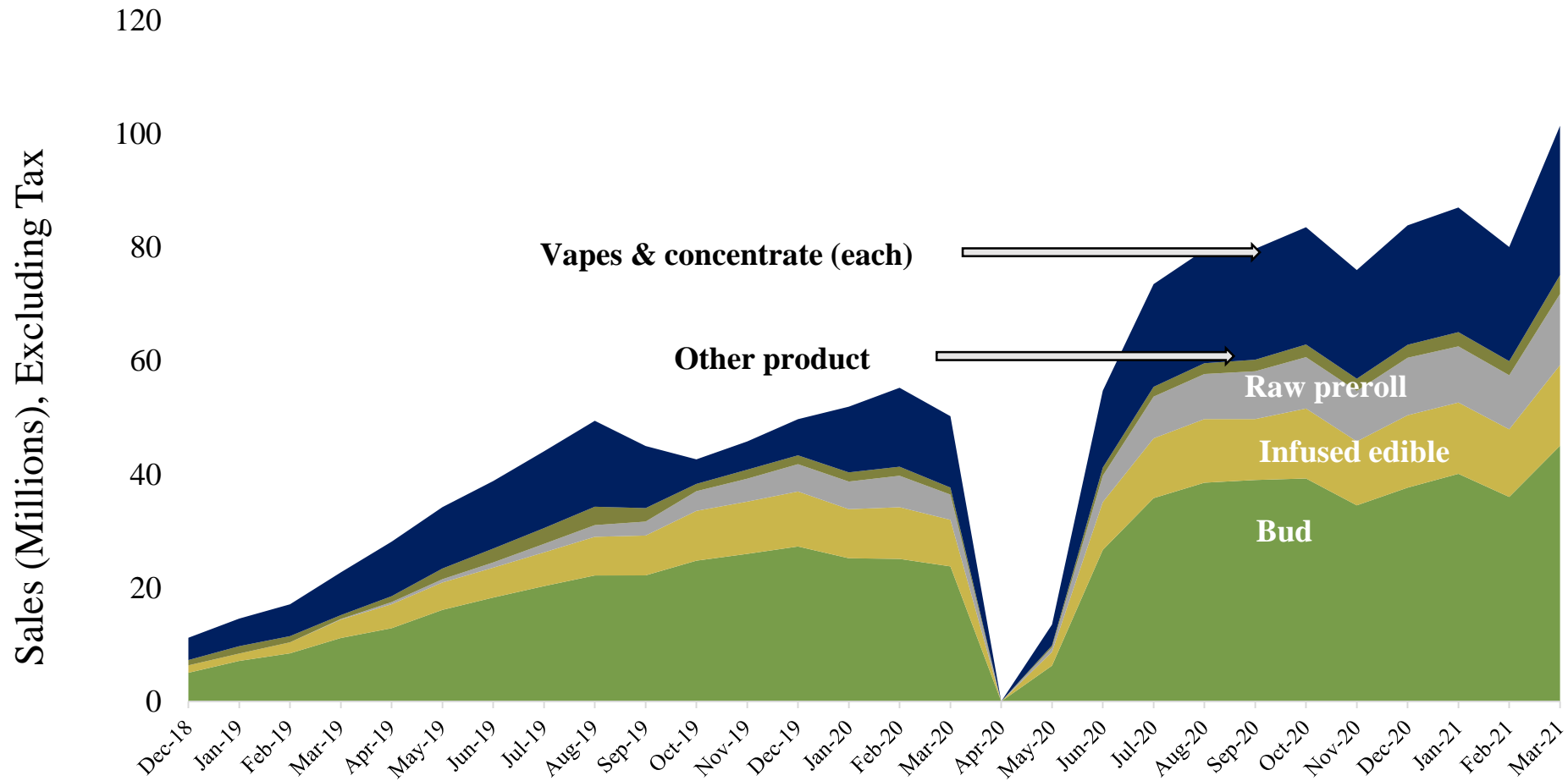
Potency Research Barriers

- There are major political and practical barriers to conducting research with cannabis products;
- Much of the English-language literature base, to date, uses cannabis with low THC, which does not reflect most products sold in legal markets in the United States;
- Current English-language literature lacks standardization, making cross-study comparisons challenging.

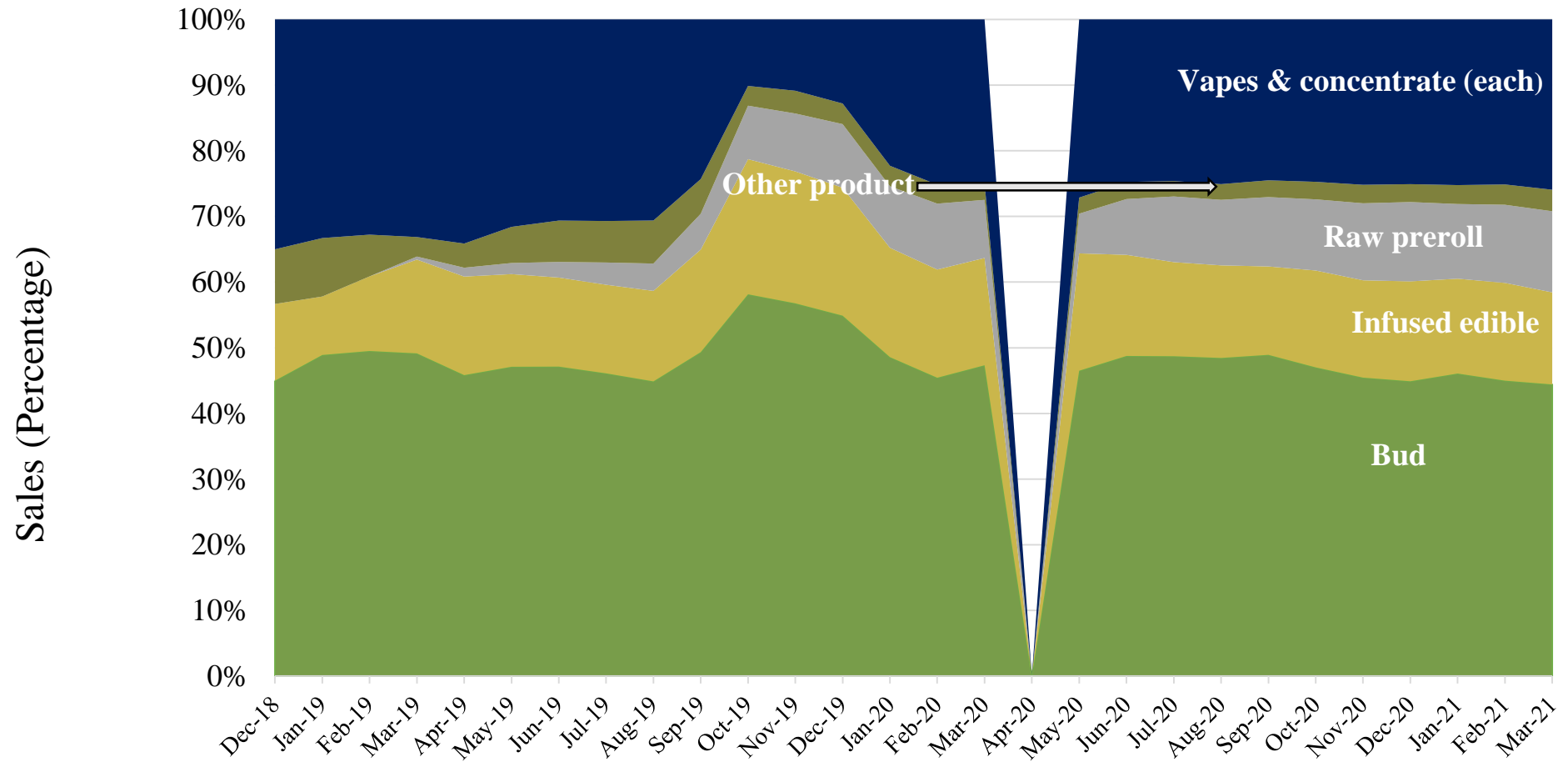
Literature Overview

- Medicinal Cannabis;
- Non-medical, Adult-use Cannabis;
- Illicit Market.

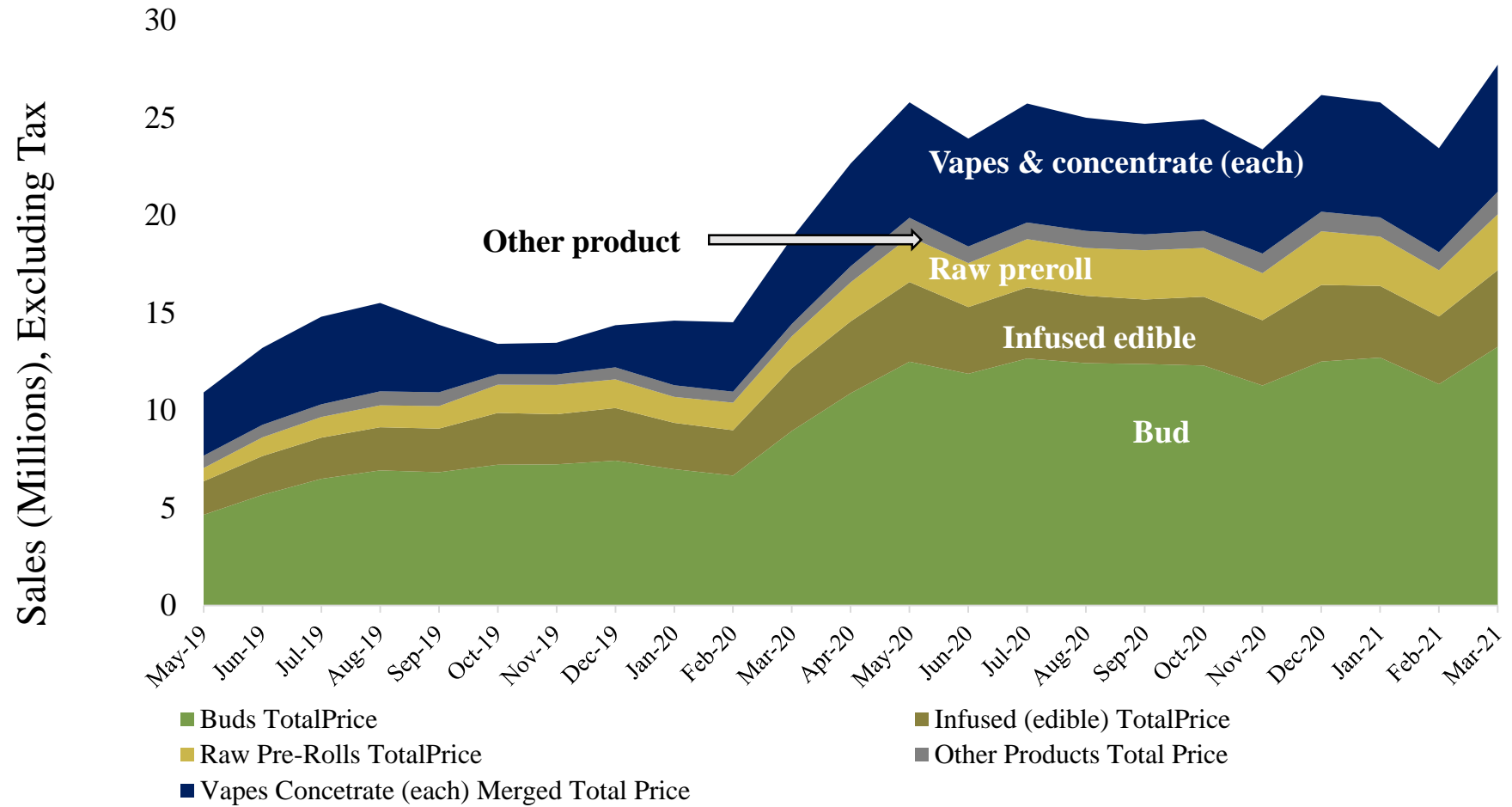
Findings: Total Dollars Spent on Adult-use Cannabis by Product Type



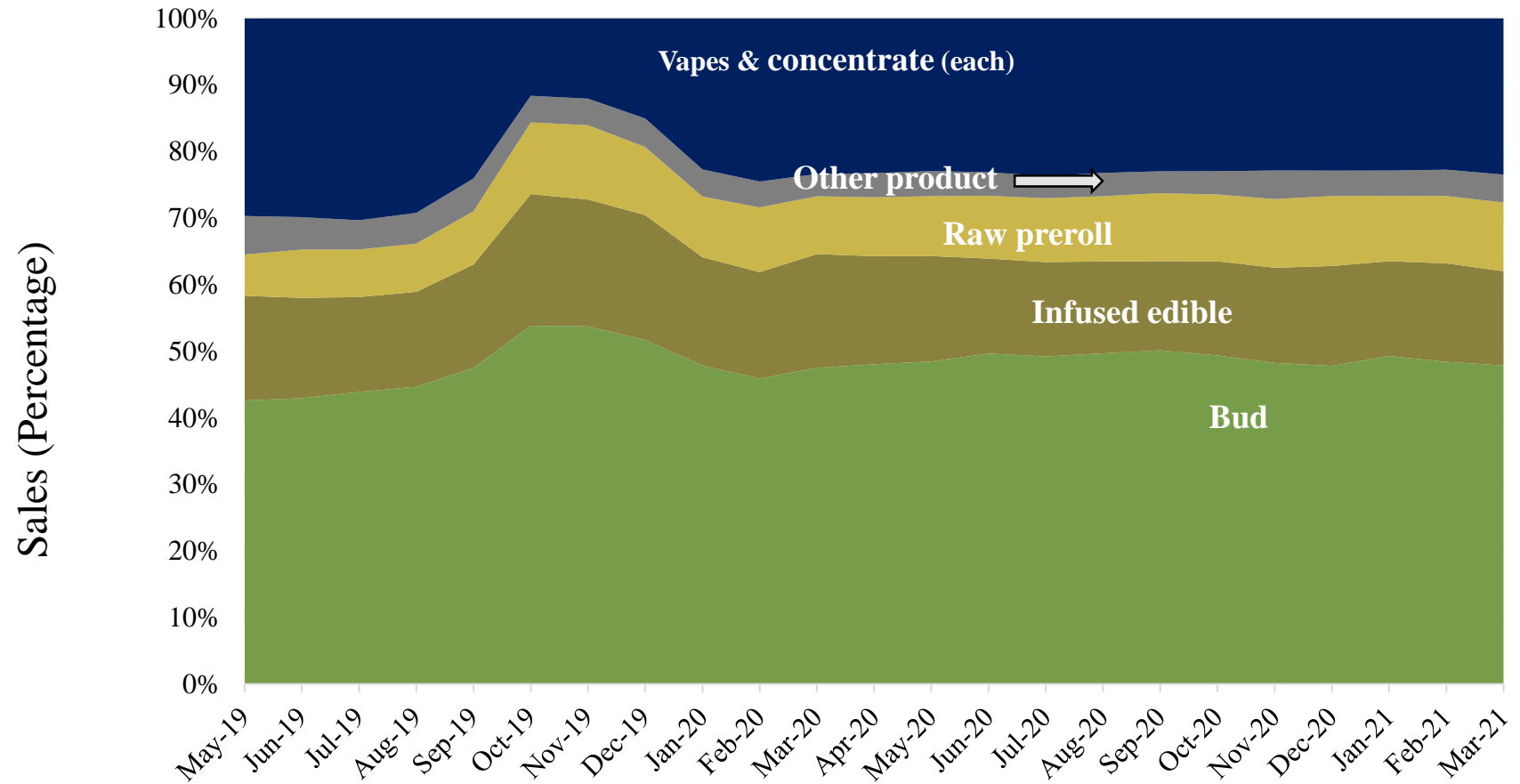
Findings: Percent of Total Monthly Adult-use Sales by Product Type



Findings: Total Dollars Spent on Medical-use Cannabis by Product Type



Findings: Percent of Total Monthly Medical-use Sales by Product Type



Limitations

- Report only includes legal sales data (“Open Data”);
- Report used categories of products (i.e., potentially high-THC products [concentrates, vaping products, edibles]) vs. actual tested THC ratios across all products;
- Extent of illicit market activity is unknown;
- The peer-review literature is relatively sparse on the impact of high THC cannabis on the human body.

Conclusion

- Evidence is not sufficient to recommend a concentration limit currently; However:
 - The Commonwealth may wish to increase scientific surveillance capacity to monitor high-THC cannabis product use.
 - To address some of the current data limitations, Commission staff offer multiple considerations to increase data capacity; and
 - A reassessment in the future may be warranted as the scientific evidence matures.

Considerations: Research

Consideration 1: Research could assess the newly enacted 5 milligram THC research dose with varying concentrations of other chemical components in cannabis plants.

Consideration 2: Research could assess how patients in the current regulated markets use medical cannabis for varying illnesses and symptoms, including dosage, modes of administration, THC concentration, and differential effects.

Considerations: Research

Consideration 3: Researchers and clinicians could develop guidelines on how to administer medical cannabis of varying concentration, including indicators of potential side effects, and effectiveness for specified conditions.

Consideration 4: Researchers could study policy mechanisms that could impact THC concentrations in the legal market.

Considerations: Research

Consideration 5: Research could assess how THC concentration levels in the legal market(s) affect purchasing and consumption behaviors in both the legal and illicit markets.

Consideration 6: Alternative data sources, such as sales data and seed-to-sale data, could be used for future research.

Considerations: Policy & Regulatory

Consideration 1: States enacting and implementing cannabis policies for medicinal and/or adult-use could implement effective seed-to-sale tracking to monitor legal cannabis throughout the production lifecycle, including testing of each batch's cannabinoid profile, including THC concentration.

Considerations: Policy & Regulatory

Consideration 2: Similar to Massachusetts, other states with comprehensive seed-to-sale tracking systems could consider building databases to allow for public health and safety purposes in addition to compliance purposes, like the Commission's [Open Data Platform](#).

Consideration 3: Similar to New York, other states' medicinal cannabis regulations could require that patients' condition and symptoms are included in the seed-to-sale tracking system, which allows linkage of that information to medical cannabis purchasing behaviors.

Considerations: Policy & Regulatory

Consideration 4: To prevent youth diversion, specifically for high-THC cannabis, which is more harmful to some youth (i.e., youth without medical need), states could limit high-THC cannabis products in the medical market to specify efficacious medical conditions, such as cancer pain, to dispense high-THC cannabis to those within a specified age bracket, such as 18-21 or 18-25.

Considerations: Policy & Regulatory

Consideration 5: States could license and regulate research facilities conducting research using the cannabis plant. The Commission licenses Marijuana Research Facilities as well as issues Research Permits (i.e., research projects to be conducted within the licensed facilities).

Consideration 6: States could develop evidence-based cannabis prescribing guidelines for cannabis products based on the currently available scientific evidence and in collaboration with clinicians and cannabis researchers.

Considerations: Policy & Regulatory

Consideration 7: States could implement additional taxes on non-medical, high-THC cannabis.

Consideration 8: States could implement regulations to only permit high-THC cannabis products for medical patients, and more specifically for medical patients with specified diagnoses, illnesses, and symptoms for which scientific studies have shown efficacy.

Considerations: Massachusetts

Consideration 1: The Commission could change its data collection process to link cannabinoid concentrates to product sales, as the current mechanism requires hand-coding.

Consideration 2: The Commission could work with its seed-to-sale tracking vendor to provide definitions for each of the cannabis product type classification categories which could increase data quality and reliability.

Considerations: Massachusetts

Consideration 3: The Commission could continue its work to increase research capacity within the state, such as the implementation and regulation of Research Facility Licensing and Research Permits, and advocate for decreasing federal barriers in cannabis research.

Consideration 4: The Commonwealth could add the Marijuana Module to the Behavioral Risk Factor Surveillance System (BRFSS).

Consideration 5: The Commonwealth could add cannabis questions to Youth Risk Behavior Surveillance System (YRBSS) and Youth Health Survey (YHS).

Consideration 6: The Commonwealth could add cannabis questions to the Pregnancy Risk Assessment Monitoring System (PRAMS).

****Note:** There are costs associated with adding additional questions (“metrics”) to the BRFSS, YRBSS, YHS, and PRAMS.

Considerations: Massachusetts

Consideration 7: The Commonwealth could use industry seed-to-sale tracking data combined with the Regional Center for Poison Control and Prevention out of Boston Children's Hospital to surveil both high THC concentration cannabis among youth and potential diversion from the legal medicinal market.

Consideration 8: Massachusetts could develop and add a section on high-THC cannabis products for inclusion in the Responsible Vendor Training (RVT) curriculum, notably, the Advanced Core Curriculum to be implemented in July 2022.

Considerations: Education

Consideration 1: Research shows that most cannabis consumers do not fully understand labeling and what constitutes high THC concentration products. To increase understanding, the Commission could create additional public awareness materials or build upon its campaign, “More About Marijuana,” to educate consumers on what constitutes high-THC concentration cannabis.

Consideration 2: States’ medical societies and educational programs could add cannabis as medicine to clinical and training curriculums, ensuring providers are educated in the current state of data of cannabis efficacy and concentration.

Questions?

Doonan SM., Laramie O., & Johnson JK. (2021, October). High Tetrahydrocannabinol (THC) Cannabis and Effects on the Human Body—More Research Needed. *A Legislative Report and Considerations for Research and Policy*. Worcester, MA: *Massachusetts Cannabis Control Commission*.

Commission Discussion & Votes

- Annual Activities Report
- Job Description: Constituent Services Manager
- Responsible Vendor Training Renewals
- Disproportionately Impacted Areas



Responsible Vendor Training Renewals

- Bartucca Consulting
- Cannabis Trainers
- Medical Marijuana 411
- Stoker Consulting
- Quality Control Analytics





Commission Discussion & Votes

- Disproportionately Impacted Areas





Upcoming Meetings & Adjournment

Upcoming Meetings and Important Dates

Next Meeting Date:
Thursday, November 18

- Monthly Public Meeting
 - Remote via Teams
 - 10:00 AM



Additional Licensing Data

Licensing Applications | October 14, 2021

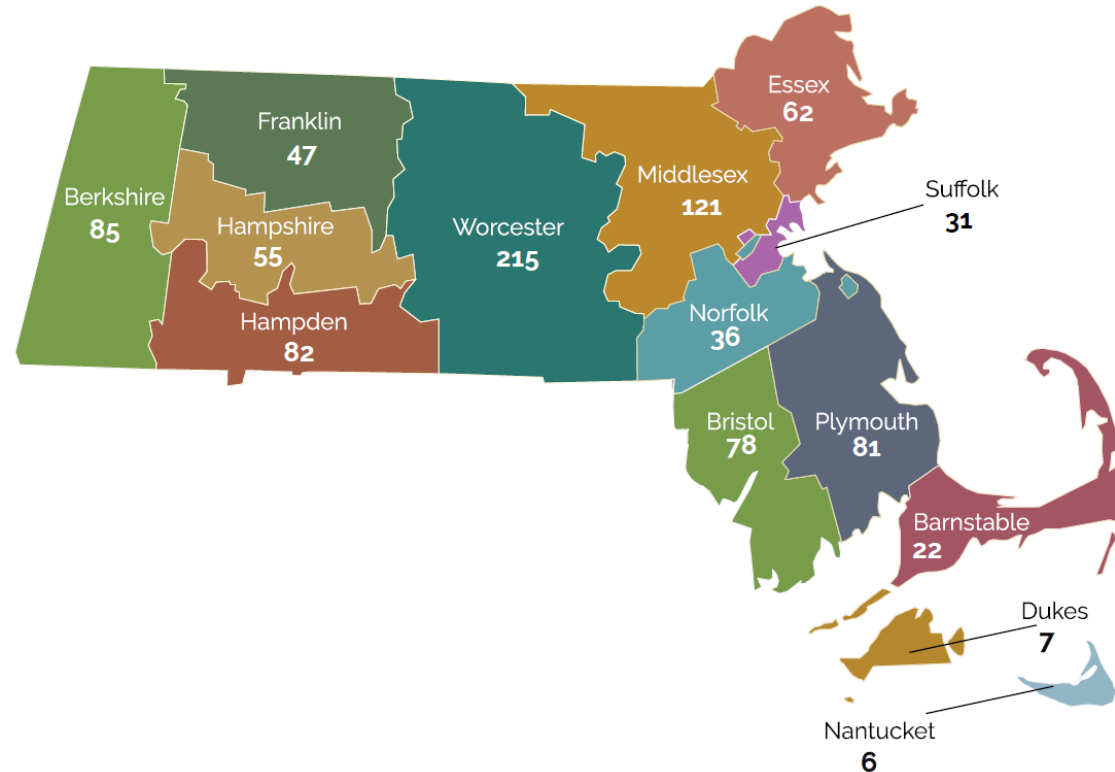
The totals below are applications that have submitted all four packets and are pending review.

Type	#
Craft Marijuana Cooperative	2
Delivery-Only Provisional Licensure (Part 2)	8
Delivery-Only Pre-Certification (Part 1)	10
Independent Testing Laboratory	6
Marijuana Cultivator	62
Marijuana Delivery Operator Provisional License (Part 2)	11
Marijuana Delivery Operator Pre-Certification (Part 1)	7
Marijuana Microbusiness	7
Marijuana Product Manufacturer	40
Marijuana Research Facility	7
Marijuana Retailer	61
Marijuana Transporter with Other Existing ME License	1
Microbusiness Delivery Endorsement	0
Third Party Transporter	4
Total	226

Licensing Applications | October 14, 2021

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

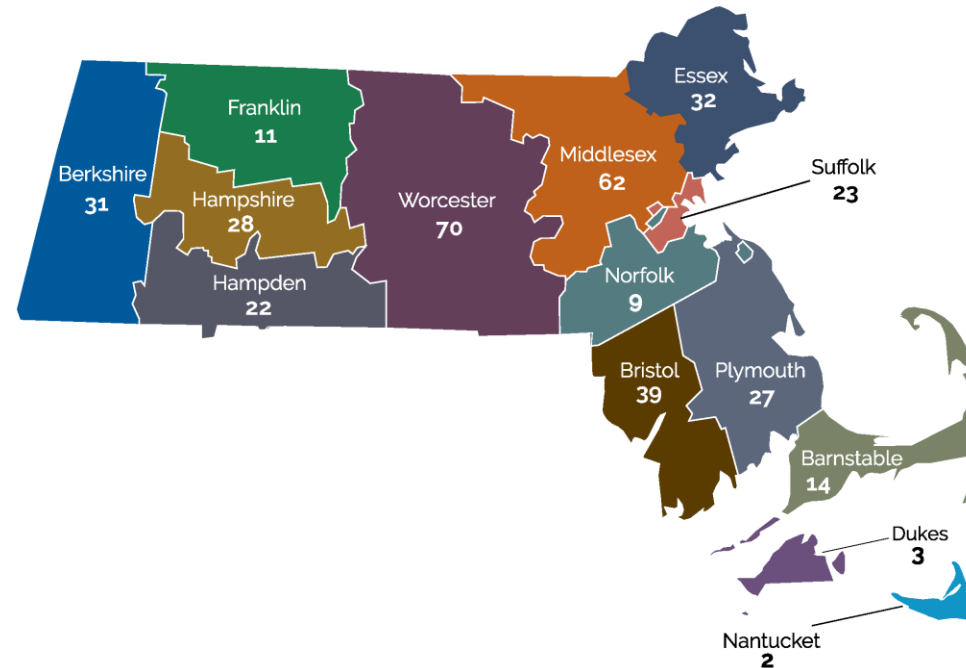
COUNTY	#	+/-
BARNSTABLE	22	
BERKSHIRE	85	+1
BRISTOL	78	
DUKES	7	
ESSEX	62	
FRANKLIN	47	
HAMPDEN	82	+2
HAMPSHIRE	55	
MIDDLESEX	121	+4
NANTUCKET	6	
NORFOLK	36	+1
PLYMOUTH	81	
SUFFOLK	31	+4
WORCESTER	215	+8
TOTAL	928	+20



Licensing Applications | October 14, 2021

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

COUNTY	#	+
BARNSTABLE	14	
BERKSHIRE	31	+1
BRISTOL	39	
DUKES	3	
ESSEX	32	
FRANKLIN	11	
HAMPDEN	22	
HAMPSHIRE	28	
MIDDLESEX	62	+1
NANTUCKET	2	
NORFOLK	9	
PLYMOUTH	27	
SUFFOLK	23	+2
WORCESTER	70	
TOTAL	373	+4



Adult Use Agent Applications | October 14, 2021

32,564 Total Agent Applications:

314
Total
Pending

{ 297 Pending Establishment Agents
17 Pending Laboratory Agents

- 1,538 Withdrawn
- 2,090 Incomplete
- 1,454 Expired
- 10,782 Surrendered
- 2 Denied / 1 Revoked
- 16,383 Active

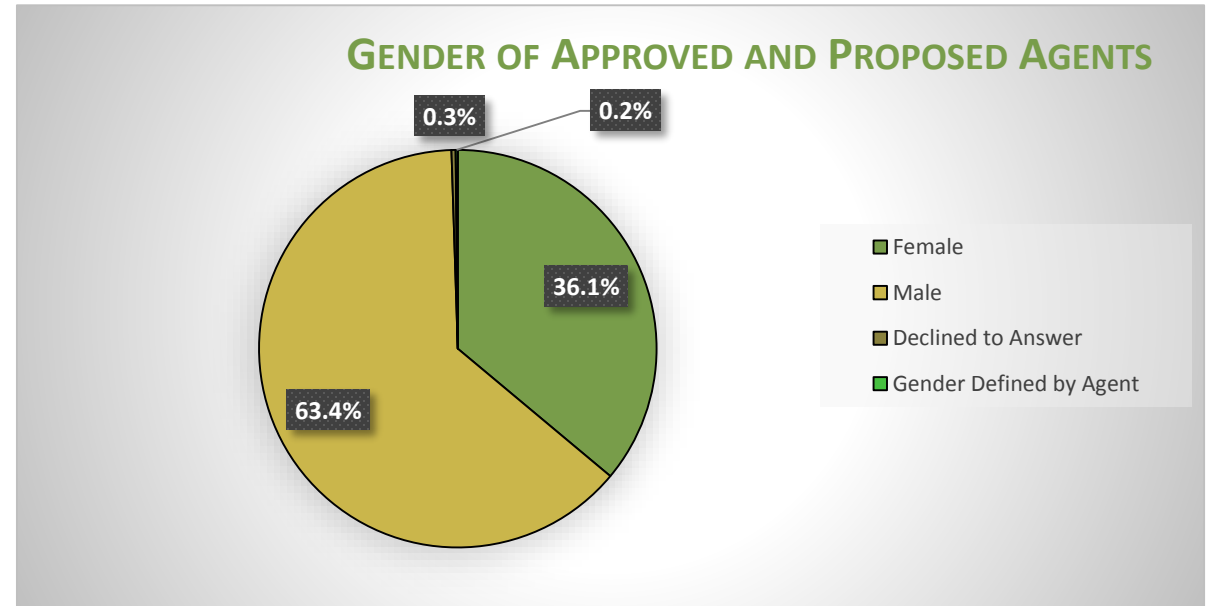
Of 281 Total Pending:

- 159 not yet reviewed
- 141 CCC requested more information
- 14 awaiting third party response
- 0 Review complete; awaiting approval

Agent Applications | October 14, 2021

Demographics of Approved and Pending Marijuana Establishment Agents

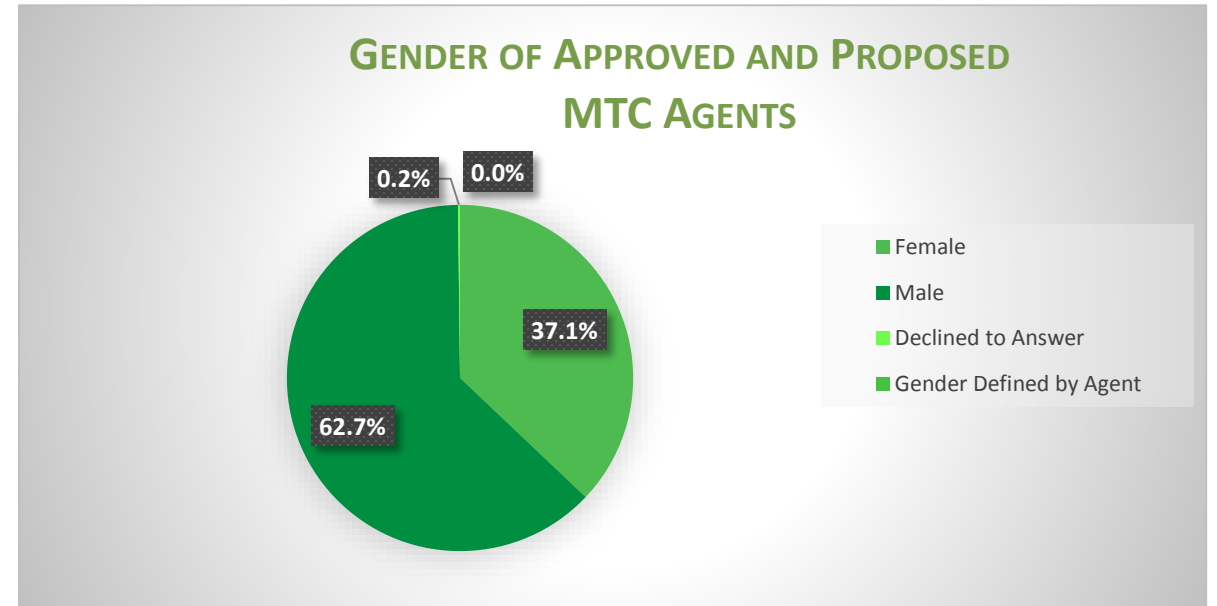
Gender	#	%
Female	6,024	36.1%
Male	10,588	63.4%
Declined to Answer	56	0.3%
Gender Defined by Applicant	29	0.2%
Total	16,697	100%



Agent Applications | October 14, 2021

Demographics of Approved and Pending Medical Marijuana Treatment Center Agents

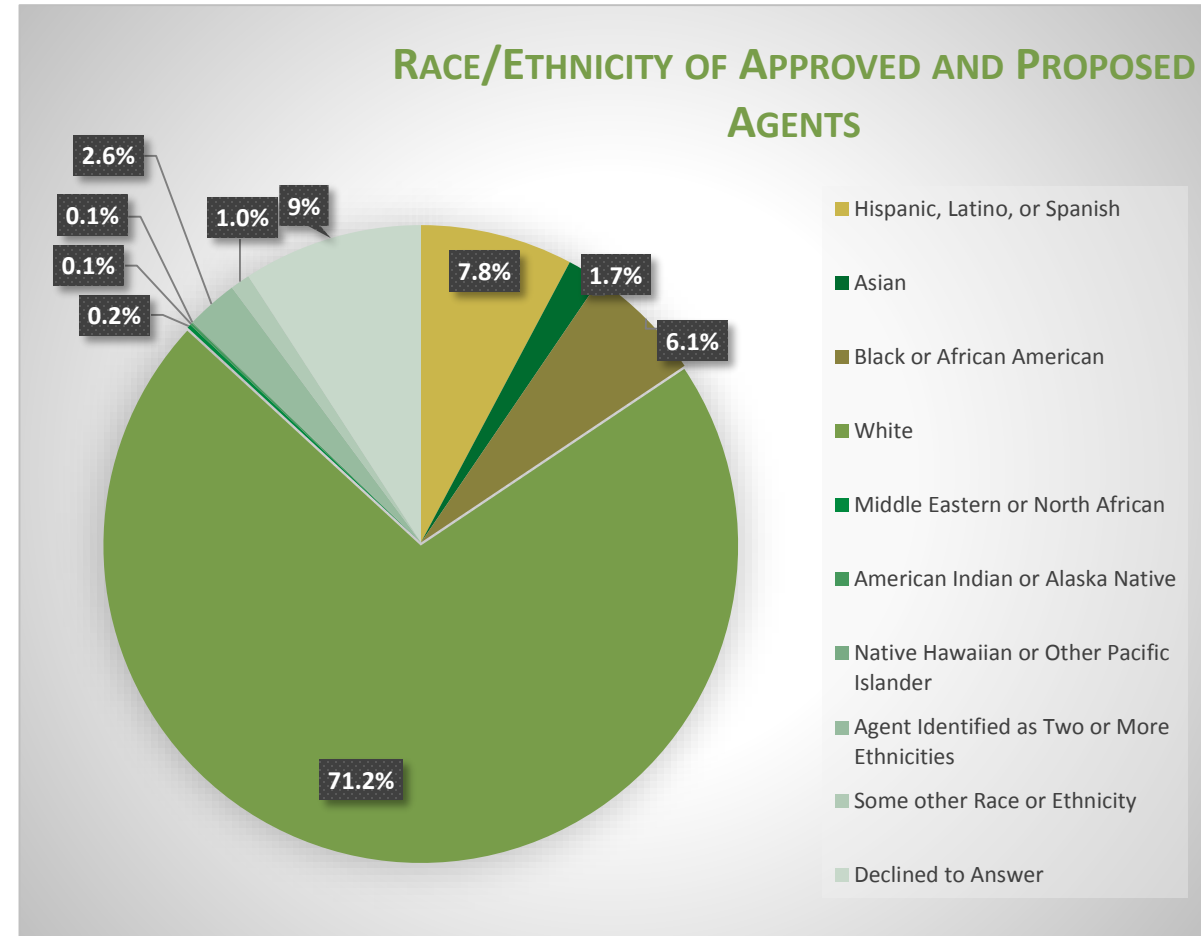
Gender	#	%
Female	3,172	37.1%
Male	5,368	62.7%
Declined to Answer	16	0.2%
Gender Defined by Applicant	0	0%
Total	8,556	100%



Agent Applications | October 14, 2021

Demographics of Approved and Pending Agents

Race/Ethnicity	#	%
Hispanic; Latino; Spanish	1,297	7.8%
Asian	291	1.7%
Black; African American	1,017	6.1%
White	11,895	71.2%
Middle Eastern; North African	32	0.2%
American Indian; Alaska Native	22	0.1%
Native Hawaiian; Other Pacific Islander	9	0.1%
Identified as Two or More Ethnicities	438	2.6%
Other Race or Ethnicity	167	1%
Declined to Answer	1,529	9.2%
Total	16,697	100%

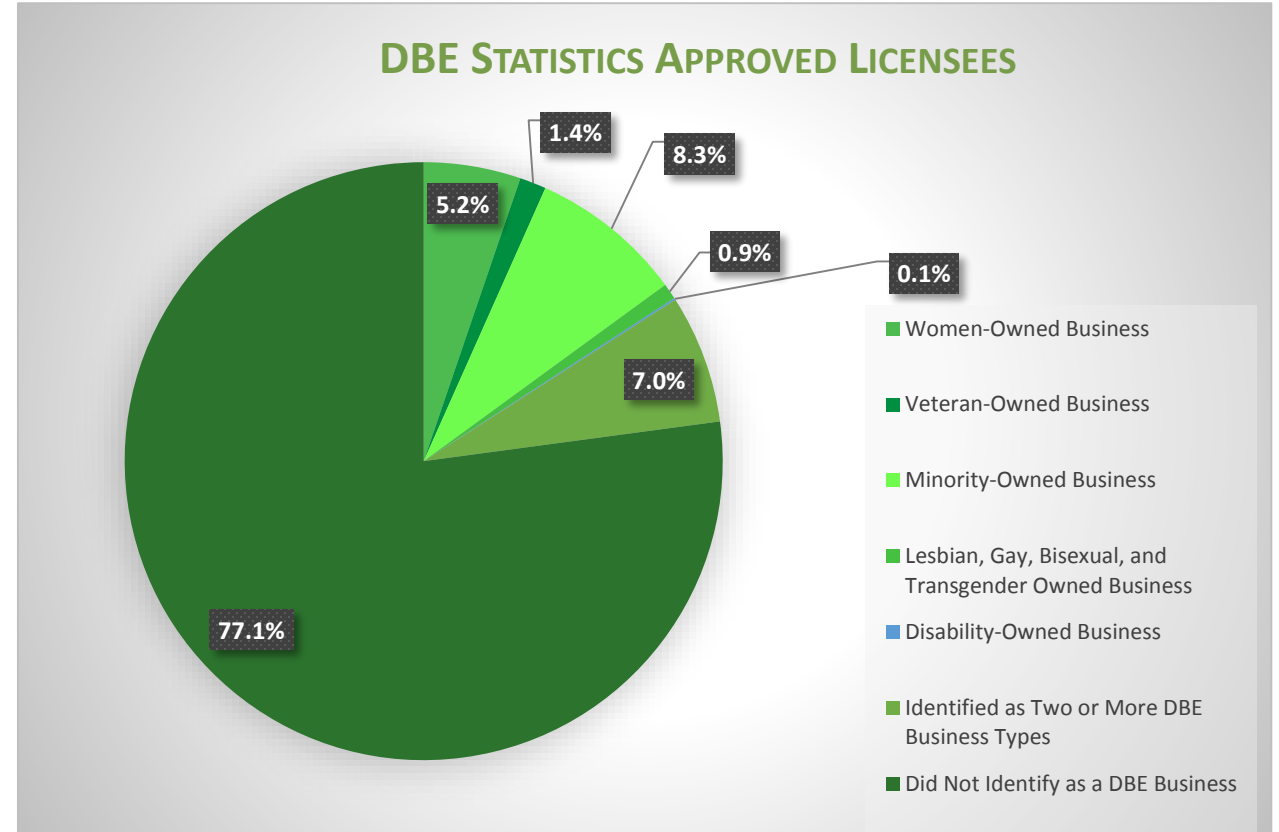


* Additional data available at the end of slide presentation

Licensing Applications | October 14, 2021

Disadvantaged Business Enterprise Statistics for Approved Licensees

Type	#	% of Group
Women-Owned Business	55	5.2%
Veteran-Owned Business	15	1.4%
Minority-Owned Business	87	8.3%
Lesbian, Gay, Bisexual, and Transgender Owned Business	9	0.9%
Disability-Owned Business	1	0.1%
Identified as Two or More DBE Business Types	73	7%
Did Not Identify as a DBE Business	809	77.1%
Total	1,049	100%

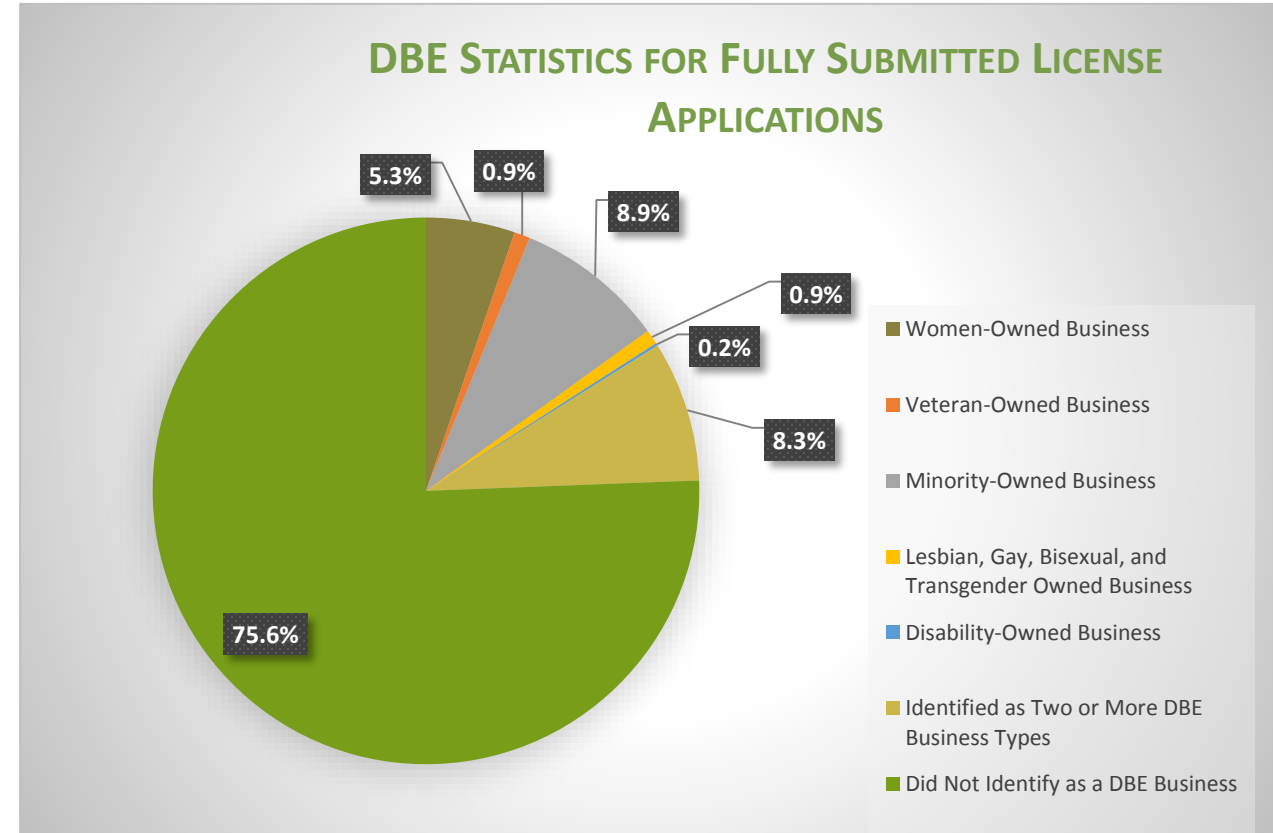


* Additional data available at the end of slide presentation

Licensing Applications | October 14, 2021

Disadvantaged Business Enterprise (DBE) Statistics for Fully Submitted License Applications

Type	#	% of Group
Women-Owned Business	67	5.3%
Veteran-Owned Business	12	0.9%
Minority-Owned Business	113	8.9%
Lesbian, Gay, Bisexual, and Transgender Owned Business	11	0.9%
Disability-Owned Business	2	0.2%
Identified as Two or More DBE Business Types	106	8.3%
Did Not Identify as a DBE Business	964	75.6%
Total	1,275	100%



* Additional data available at the end of slide presentation

Medical Use Agent Application | October 14, 2021

MTC Agent Applications	#
Pending MTC Agent Applications	90
Pending Laboratory Agent Applications	0
Incomplete	45
Revoked	4
Denied	31
Surrendered	7,987
Expired	1,284
Active	8,466
Total Agent Applications	17,907