

June 2, 2021 12-1:30pm Via Zoom Attendees: 5 CPD staff, 3 industry attendees

Transportation:

- Attendee 1 - From attending other organizational meetings like WACA and other groups, I know there is a question about transportation. I know you're adopting what LCB has, but wanted to make a note that transportation areas are all tied into vehicle requirements, manifest and driving directions, etc. – it's not always accurate because the manifest requires you to leave from the headquarters or processing facility and go to that destination, and most drivers have a route so we're not leaving for every delivery from our headquarters. And transportation documents include directions only from that headquarters locations. And a driver got pulled over and wasn't headed in directions on manifest, which causes problems. So this is a problem that LCB needs to address. With BioTrack, we could alter manifests according to routes, but with the new system that is no longer an option and is something that can/should be updated.

***Review and Response:** This section has been excluded due to traceability system manifest limitations. MJR 085 (3) Transportation manifest. A complete printed transport manifest on a form provided by the WSLCB containing all information required by the WSLCB must be kept with the product at all times.*

*This section allows for stops to other facilities receiving product. MJR 085 (5) (f) Any vehicle transporting marijuana or marijuana products must travel directly from the shipping licensee to the receiving licensee and must not make any unnecessary stops in between **except to other facilities receiving product.***

- Attendee 2 - Common sense, really – put yourself in operators shoes and not make it more difficult than it has to be.

Record keeping on premises:

- Attendee 2 - Record keeping on premise – did that get addressed at all?
- CPD staff – Cherie MacLeod - I'd have to go back and check, but I do recall it says it has to be readily available. But reminder that we cannot change the rule or make it less restrictive. We can make them more restrictive, but we've chosen not to do that. If the requirement that records be on premise is still in there, it should probably be raised to LCB as an issue for change.
- Attendee 2 - Are there any processors on the call?
- Attendee 1 - Yes, I'm on the call. Record keeping on premise hasn't been an issue for us; no one has ever asked us for something going back five years, I'm keeping it just in case we get audited or something.
- Attendee 2 - it would be good to shorten the amount of time we need to keep documents and/or remove requirement that it must be stored on premise – paying for square footage for record keeping is not ideal, something to be aware of.
- CPD staff – Cherie MacLeod - confirmed there is no change to current requirement – minimum of 3 years kept a licensee's location. I understand that can be a storage issue, as you mentioned, since you may have a lot of paperwork coming through. Thank you for raising that issue.
- Attendee 2 - Is "licensee's location" the same as premise?
- CPD staff – Tolley Sualoa - Actually, another section says specifically that records must be kept on premise for 5 years – this is a change, it used to require only 3 years, but now it requires five

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years. But it also says source documents can be stored at another location (still need to be retained, just not necessarily on site).

General Comments:

- Attendee 2 - Thanks for having this meeting and for representing our interests with regulators and policymakers – lots of appreciation.
- Attendee 1 - Just going to second what (Attendee 1) said, I appreciate the opportunity to meet with you and the format of this session. Didn't realize I would have so much of all your time, I would have prepared more questions, it's been great to meet all of you one-on-one. But everything you are doing sounds pretty simple and straightforward.
- Attendee 1 - One more comment. I notice a lot of you have so much influence over businesses, and I have offered this a few times, its really easy to go into retail cannabis shops to check out, but I've offered for legislators to come to our facility to take a tour and see what we do here. That offer still stands – if any one of you would like to come to learn, see how we do paperwork and handle transportation or testing, it might make it more relevant to see what its like from our perspective.
- CPD staff– Cherie MacLeod - Thank you for that offer, we may take you up on that. In the past, the tours have mostly been for out-of-town visitors, but the more I think about it, it sounds like it could be helpful. We also have new inspectors, new attorneys, etc. so thank you very much for that offer.
- Attendee 2 - That offer stands for us, too. We've hosted folks from other states and municipalities to see how we've done things. A couple of Dutch folks came by, and a couple legislators from California as well. So if there are other folks in sister cities or other places that are interested, we'd be happy to host.

June 3, 2021 12-1:30pm Via Zoom Attendees: 4 CPD staff, 4 industry attendees

Transaction limits:

- Attendee 1 via Chat - What is a transaction? A. a daily limit; B. the moment the money and cannabis change hands?; C. per visit
- CPD staff– Cherie MacLeod- My understanding is it is a per-transaction limit. However, the general idea is if that person leaves and comes back half an hour later, you should keep in mind the products they bought earlier in the day. That's my understanding, we can look into it a bit more.

Review and Response: To Attendee 1's question. MJR 095 (1) (ii) A licensee or employee of a licensee is prohibited from conducting a transaction that facilitates an individual in obtaining more than the personal possession amount. Also see [RCW 69.50.360](#).

Packaging and Labeling:

- Attendee 1 - Are the retailers, as far as City is concerned, responsible for how the producer/processors distribute, how the container looks, the material, etc.? Would you guys

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enforce a container that looks like a concession at the retailer or the processor? Are the retailers responsible to make sure none of the containers look like a concession in the store, or is it 100% on processor/producer side?

- CPD staff– Tolley Sualoa - We would probably address it at both levels; if we found non-compliant packaging at a retailer, we would note it on the inspection, but we would also follow up with processor. We know this is new for everyone, so we will begin with an educational approach – notify you the product is not in compliance, and follow up with processor. But ultimately, retailer is responsible for ensuring items sold in their store are in compliance.
- CPD staff– Cherie MacLeod - In all years our rules have been in place, we have not issued any penalties; inspectors always work with business to bring them into compliance.

Log Book:

- Attendee 2 - What's the log book?
- CPD staff– Tolley Sualoa - Mostly for producers or processors, need to track any visitors to location. For retailers, only if you have behind-the-scenes visitors.
- Attendee 2 - LCB doesn't require log book, now the City does? LCB lets us keep it in the Cloud, but City doesn't?
- CPD staff– Cherie MacLeod - That's fine as long as it's in compliance.

Recording keeping:

- Attendee 1 - With the BI (?) system, technically you can go back to any date you want to as long as you have POS system. Let's say I change POS system, do I have to print out whatever was on the old POS system or what? Most of our sales are on POS system, but if you change it you don't have access to the data anymore. So how do you store all the data?
- CPD staff– Cherie MacLeod - So the requirement is to keep the records for five years, so will be up to you to determine how to do that. Whether it's downloading the data, printing it, etc. It's one of those you'll have to investigate because you do have to retain those records for five years.
- Attendee 2 - The LCB changed a few years back from MJ Freeway and now it's called Leaf. How is that considered? We still have to print that out? Anyway, I get it – print out and save everything if you change something. Thank you.