

**House Bill 14-1366 Work Group
Legislative Report Recommendation Form**

1. **Work Group Sponsor (s):** Gina Carbone, Smart Colorado

2. **Describe the Recommendation:**

The attached comment explores the plain meaning of HB 1366 and the General Assembly's intent behind enacting the bill. The comment also sets forth a proposal for how all marijuana-infused edible products can be made "clearly identifiable," as required by HB 1366.

3. **Which portion or portions of House Bill 14-1366 does this recommendation address (underline all those that apply)?**

- a. Protect people from the unintentional ingestion of edible retail marijuana products.
- b. Ensure that edible retail marijuana products are readily identifiable by the general public.
- c. Makes it clear that the product is not for consumption by children.
- d. Makes it clear that the product is safe for consumers.
- e. Utilize a universal symbol.

4. **Please summarize the rationale for the recommendation – why is it important?**

As previously indicated, the attached comment establishes the plain meaning of HB 1366 and the clear legislative intent behind the bill.

It is important because, in fulfilling its obligations under HB 1366, MED is "without power to act contrary to law or clear legislative intent or to exceed authority conferred upon [it] by statute." *Colorado Div. of Employment and Training, Dept. of Labor and Employment v. Industrial Com'n of State of Colo.*, 665 P.2d 631 (Colo. App. 1983). In other words, MED may not substitute its judgment for that of the General Assembly.

5. **Describe how your recommendation addresses the rulemaking guiding principles of being transparent, operable, defensible and systematic for the licensees as well as the Marijuana Enforcement Division.**

Smart Colorado's proposal clearly articulates which edible products must bear a symbol, and provides options for how the symbol can be applied. The options provided afford manufacturers the ability to choose among alternatives if one proposed method of marking products is undesirable.

The proposal leverages contemporary technology for applying a symbol to edible products. For example, manufacturers can symbolize the presence of marijuana in their products using a culinary airbrush system, a custom mold, a branding instrument, or a unique color.

The marking requirements MED will ultimately promulgate can be easily enforced. Pursuant to its inspection authority, MED can easily inspect product manufacturers' inventory to ensure their products bear the requisite symbol.

Most importantly, Smart Colorado's proposal offers "practicable" methods for applying a symbol to edible products.

"Practicable" is neither defined in HB 1366 nor any other place in Colorado's Retail Marijuana Code.

When interpreting ambiguous statutory terms, it is imperative that common words be given their ordinary meanings. *People v. Vecellio*, 292 P.3d 1004, 1010 (Colo. App. 2012). When a statute does not define a term, but the term in question is of common usage, the dictionary definition may be used to determine the plain and ordinary meaning of that term. *Marks v. Koch*, 284 P.3d 118, 123 (Colo.App.2011); *People v. Connors*, 230 P.3d 1265, 1267 (Colo.App.2010).

"Practicable" is defined in Webster's Third New Dictionary as "possible to...perform; capable of being...done." Each method Smart Colorado proposes for applying a symbol to edible products is "possible to perform" and "capable of being done."

Furthermore, Smart Colorado's proposals are not so onerous as to render operation of a products manufacturing facility economically unsustainable, and as a result, do not rise to the level of being "unreasonably impracticable" as that term is defined in Colorado's Constitution.

6. What stakeholders, other than licensees and the Marijuana Enforcement Division, would be positively or negatively impacted by this recommendation? Please explain the impact.

Children, parents, grandparents, guardians, principals, teachers, school resource officers, law enforcement officers, and others, will be provided the tools they need to determine when a food product contains marijuana.

7. What issue or issues does your recommendation resolve? (Please identify the issues)

The attached comment establishes the meaning of the term "practicable" as it is used in HB 1366, and thereby addresses which edible products must bear a standard symbol as required in the bill.

The attached comment also addresses when a rule promulgated by MED is "unreasonably impracticable" as that term is defined in Colorado's Constitution.

Finally, the attached comment sets forth "practicable" methods for applying a symbol to each category of edible products.

8. Is there a dissenting voice on the working group concerning this recommendation? If yes, please provide a summary of the minority opinion about this recommendation.

HB 1366 directs MED to promulgate rules requiring edible marijuana products to be clearly identifiable, when *practicable*, with a standard symbol.

During the two HB 1366 Working Group meetings held to date, marijuana industry representatives have argued for a standard that more accurately describes the term “prudent,” not “practicable.” Webster’s Third New Dictionary defines “prudent” as “shrewd in the management of practical affairs.” Similarly, industry has argued that when it’s too costly or difficult to apply a symbol to an edible product, they are not required to do so. But the General Assembly did not require products to be clearly identifiable with a symbol “when prudent.” The General Assembly required that products be clearly identifiable with a symbol “when practicable.”

Again, “practicable” is defined in Webster’s Third New Dictionary as “possible to...perform; capable of being...done.” This is the standard MED must use to determine whether applying a symbol to various edible products is “practicable,” and therefore required under HB 1366.

9. Are you aware of any statutory authority or regulation that supports the basis of this recommendation? If yes, please include it here.

No

10. Is the implementation of your recommendation dependent on another decision or action? If yes, specifically what actions or decisions are required before this recommendation can be implemented?

No

11. Will the recommendation have a cost to implement? If yes, please explain the reason for the cost and provide an estimate.

Cost estimates are set forth in the attached comment. However, the proposal will not result in any costs beyond those anticipated by the General Assembly when it enacted HB 1366.

Furthermore, the proposal will not render operation of a marijuana establishment economically unsustainable, and therefore does not rise to the level of being “unreasonably impracticable” as that term is defined in Colorado’s Constitution.

12. Provide an estimate of how long it would take to implement the recommendation.

Without question, Smart Colorado’s proposal can be implemented by the rulemaking deadline of January 1, 2016.

Comments provided by Smart Colorado to the Marijuana Enforcement Division's HB 1366 Working Group

The following comment is submitted to the Marijuana Enforcement Division ("MED or the "Division") by Smart Colorado. The comment explores the plain meaning of HB 1366 and the General Assembly's intent behind enacting the bill. The comment also sets forth a proposal for how all marijuana-infused edible products can be made "clearly identifiable," as required by HB 1366.

I. Parameters within which MED must work while writing rules pursuant to HB 1366

MED, like all Colorado administrative agencies, derives its powers and duties from statute enacted by the General Assembly.

Earlier this year, the General Assembly, through HB 1366, directed MED to require that "edible retail marijuana products be clearly identifiable, when practicable, with a standard symbol indicating that it contains marijuana and is not for consumption by children." *Codified at Colo. Rev. Stat. § 12-43.4-202(3)(C.5)(I)*.

In fulfilling this obligation, MED is "without power to act contrary to law or clear legislative intent or to exceed authority conferred upon [it] by statute." *Colorado Div. of Employment and Training, Dept. of Labor and Employment v. Industrial Com'n of State of Colo.*, 665 P.2d 631 (Colo. App. 1983). In other words, MED may not substitute its judgment for that of the General Assembly.

Moreover, the parameters within which MED must work while crafting its rules are fairly narrow. First, the Division's rules must satisfy the standards established by the General Assembly in HB 1366. More specifically, MED must require that, when it is practicable, edible marijuana products bear a symbol. However, in establishing these requirements, MED must not impose "unreasonably impracticable" obligations, as that term is defined in article 18, section 16 of Colorado's Constitution.

To understand the scope of MED's authority in this rulemaking, it is essential to understand what HB 1366 commands, and when a requirement imposed by MED would be considered "unreasonably impracticable" under the Constitution.

A. The legislative mandate set forth in HB 1366

As set out above, HB 1366, directs MED to require that "edible retail marijuana products be clearly identifiable, when practicable, with a standard symbol..."

While this legislative language may be subject to different interpretations, MED has interpreted the language to mean that, when it is "practicable" to apply a symbol to an edible marijuana product, manufacturers are required to do so.

To establish which edible products must bear a symbol, we must first understand the meaning of the term "practicable." "Practicable" is neither defined in HB 1366 nor any other place in Colorado's Retail Marijuana Code.

When interpreting ambiguous statutory terms, it is imperative that common words be given their ordinary meanings. *People v. Vecellio*, 292 P.3d 1004, 1010 (Colo. App. 2012). When a statute does not define a term, but the term in question is of common usage, the dictionary definition may be used to determine the plain and ordinary meaning of that term. *Marks v. Koch*, 284 P.3d 118, 123 (Colo.App.2011); *People v. Connors*, 230 P.3d 1265, 1267 (Colo.App.2010).

"Practicable" is defined in Webster's Third New Dictionary as "possible to...perform; capable of being...done." *Webster's Third New International Dictionary* 1780 (2012). This is the standard MED must use to determine whether applying a symbol to various edible products is "practicable," and therefore

required under HB 1366. In essence, when it is possible, by any means, to apply a symbol to an edible product, manufacturers must do so.

During the two HB 1366 Working Group meetings held to date, marijuana industry representatives have argued for a standard that more accurately describes the term "prudent." Webster's Third New Dictionary defines "prudent" as "shrewd in the management of practical affairs." Similarly, industry has argued that when it's too costly or difficult to apply a symbol to an edible product, they are not required to do so. But the General Assembly did not require products to be clearly identifiable with a symbol "when prudent." The General Assembly required that products be clearly identifiable with a symbol "when practicable" or "possible to perform."

Because MED is bound to act in a manner that is consistent with the law set forth in HB 1366, and the General Assembly's intent in enacting that law, the Division must not conflate the "practicable" standard employed by the General Assembly, and the more forgiving "prudent" standard often articulated by the industry. Instead, the Division must apply the ordinary meaning of "practicable" and require that, when it is possible to apply a symbol to an edible product, manufacturers must do so.

B. Unreasonably impracticable standard set forth in Colorado's Constitution

On several occasions during HB 1366 Working Group meetings, it has been mistakenly suggested that the term "practicable," as it appears in HB 1366, and the term "unreasonably impracticable," as it appears in the state's constitution, share the same meaning.

In actuality, these terms have very different applications. HB 1366's "practicable" standard governs when MED must require manufacturers to mark their products with a symbol. The constitutional term "unreasonably impracticable" is a standard by which rules promulgated by MED are judged. The fact that the term "unreasonably impracticable" was not used in HB 1366 signals an intent on the part of the General Assembly to afford the term used, "practicable" in this instance, a different meaning. *See Carlson v. Ferris*, 85 P.3d 504 (Colo.2003) ("use of different terms [within the same statute or code] signals an intent on the part of the General Assembly to afford those terms different meanings").

In this rulemaking, MED must consider both standards, and "thread the needle" between what it is required to do pursuant to HB 1366 (i.e. require that edible products bear a symbol) and what it is forbidden from doing pursuant to the constitutional prohibition on "unreasonably impracticable" regulations.

Under the constitutional definition, a regulation is "unreasonably impracticable" when "the measures necessary to comply with the regulation[] require such a high investment of risk, money, time, or any other resource or asset that the operation of a marijuana establishment is not worthy of being carried out in practice by a reasonably prudent businessperson." *Colo. Const. art. 18 § 16(2)(o)* (emphasis added).

This constitutional definition sets a very high standard for establishing that a regulation is "unreasonably impracticable." A regulation is not "unreasonably impracticable" simply because it is costly or difficult to follow. A regulation is only "unreasonably impracticable" if it is so costly or difficult to follow that it renders operation of a marijuana establishment economically unsustainable.

In this context, MED's regulations would only be considered "unreasonably impracticable" if they alone were so onerous as to force the "reasonably prudent businessperson" to forego operating a products manufacturing facility, and the economic opportunity inherent in doing so. Here, the "reasonably prudent businessperson" is not just an average products manufacturer, it is an objective standard that contemplates a composite of shrewd business judgment in relation to challenges posed by MED's regulations. *See generally Freedom from Religion Foundation, Inc. v. Hickenlooper*, 2012 WL 1638718 (Colo.App.).

Estimates from the Governor's office suggest that marijuana sales in Colorado will approach \$1 billion this fiscal year. According to recent media reports, edibles sales make up 40 percent of the state's marijuana

market, or approximately \$400 million. In light of the economic opportunities inherent in operating a products manufacturing facility, MED can safely assume that shrewd businesspeople will be eager to participate in Colorado's edibles market in spite of the costs they would incur marking their edible products.

II. Smart Colorado's proposal: possible to accomplish and not unreasonably impracticable

As previously indicated, the marijuana industry has argued that when it is too difficult or too costly to apply a symbol to their products, they are simply not obligated to do so. But what has been lost during these conversations is the fact that HB 1366 is now law and requires MED to mandate the marking of edible products. Also lost in discussion over what's too expensive or too difficult for manufacturers to accomplish are the public safety considerations that led to the enactment of HB 1366.

The primary objective behind HB 1366 was to provide children, parents, grandparents, guardians, principals, teachers, school resource officers, law enforcement officers, and others, the tools they need to determine when a food product contains marijuana. The attached photographs of marijuana-infused Swedish Fish and regular Swedish Fish (see Attachment 1) and marijuana-infused Rainbow Belts and regular Rainbow Belts (see Attachment 2) illustrate the need for MED to fulfill its obligation under HB 1366.

The marijuana-infused candies and regular candies in the attached photographs look identical. How can a parent teach their child which of these items is safe to eat? How can a law enforcement officer determine which of these items contains marijuana? And when one of these items is passed around a classroom, how can a teacher know whether it contains marijuana?

It is now MED's responsibility to provide parents, law enforcement officers, and teachers the tools they need. The General Assembly states explicitly that its intent in enacting HB 1366 was to "ensure that edible retail marijuana products are readily identifiable by the general public." Accomplishing this objectives is MED's charge.

Of course the General Assembly anticipated that industry would incur costs and challenges marking their products, but they enacted HB 1366 nevertheless. MED cannot be deterred from fulfilling its obligations simply because doing so will require manufacturers to expend additional resources. The Division must take meaningful action to achieve the public safety objectives the General Assembly aimed to accomplish with HB 1366.

What follows is a general description of Smart Colorado's proposal for how a standard symbol can be applied to various types of edible products. Attached to this document is MED's catalogue of edible items currently on the market, and a description of how each of these items can be made clearly identifiable (see Attachment 3). Also attached are examples of infused and non-infused edible products that bear identifying symbols. The fact that symbols have been applied to these products demonstrates that marking similar products is "possible to perform." Again, this is the standard MED must use to determine whether applying a symbol to various edible products is "practicable," and therefore required under HB 1366.

Smart Colorado's proposal offers alternative methods for marking many products. We fully understand that industry will incur costs and challenges implementing these proposals. But again, that is not dispositive. The true measure of when MED's regulations are too onerous is whether the actions required to comply with the regulations would force the "reasonably prudent businessperson" to forego operating a products manufacturing facility. Given the economic opportunities inherent in the edibles market, there can be no question that shrewd businesspeople will be eager to enter Colorado's edibles market in spite of the cost of marking products.

Baked Goods: Because it is possible to apply a symbol to all food items in the baked goods category, MED must require that all marijuana-infused baked goods bear the standard symbol. Despite industry's contention that it is too difficult to apply a symbol to baked goods, countless examples of marked baked

goods exist, and several are provided as attachments to this document (see Attachment 4). Set out below is a brief description of methods that can be used to apply a symbol to various baked goods.

- **Brownies:** (1) airbrushing the standard symbol on the brownie using a stencil and organic or nonorganic food coloring. Culinary airbrush systems are available online for as little as \$69/unit (see Attachment 5); (2) use of a mold into which brownie batter can be poured. Custom molds are available online through multiple manufacturers (see Attachment 6). Representatives of Smart Colorado reached out to custom mold manufacturers and determined that 10 molds, each containing 12 cavities (for a total of 120 cavities), can be purchased for approximately \$900; (3) use of a stencil or branding instrument to imprint the standard symbol on the brownie after it has been baked and before it hardens; or (4) application of frosting in the shape of the standard symbol.
- **Cookies:** (1) airbrushing the standard symbol on the cookie using a stencil and organic or nonorganic food coloring; (2) use of a mold into which cookie batter can be poured. Again, custom molds are available online through multiple manufacturers. Representatives of Smart Colorado reached out to custom mold manufacturers and determined that 10 molds, each containing 12 cavities (for a total of 120 cavities), can be purchased for approximately \$900; (3) use of a stencil or branding instrument to imprint the standard symbol on the cookie after it has been baked and before it hardens; or (4) application of frosting in the shape of the standard symbol.
- **Cakes:** (1) airbrushing the standard symbol on the cake using a stencil and organic or nonorganic food coloring; (2) use of a mold into which cake batter can be poured. Again, custom molds are available online through multiple manufacturers. Representatives of Smart Colorado reached out to custom mold manufacturers and determined that 10 molds, each containing 12 cavities (for a total of 120 cavities), can be purchased for approximately \$900; or (3) application of frosting in the shape of the standard symbol.
- **Granola bars:** (1) airbrushing the standard symbol on the granola bar using a stencil and organic or nonorganic food coloring; or (2) use of a stencil or branding instrument to imprint the standard symbol on the bar.
- **Crackers:** airbrushing the standard symbol on the crackers using a stencil and organic or nonorganic food coloring.
- **Pastries:** airbrushing the standard symbol on the pastries using a stencil and organic or nonorganic food coloring.
- **Superfood (Go Chi Ball/Zoom Ball):** airbrushing the standard symbol on the balls using a stencil and organic or nonorganic food coloring.

Chocolate: existing marijuana products manufacturers are currently imprinting symbols and lettering into chocolate. For example, both Full Melt (see Attachment 7) and Blue Kudu bars (see Attachment 8) are now decorated with symbols and lettering. These examples demonstrate that marking chocolate is "possible to perform." As such, Smart Colorado proposes that all chocolate be marked using one of the following methods: (1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured. Custom candy molds are available online through multiple manufacturers. Representatives of Smart Colorado reached out to custom candy mold manufacturers and determined that 10 molds, each containing 12 cavities (for a total of 120 cavities), can be purchased for approximately \$900; (3) use of a stencil or branding instrument to imprint the standard symbol on the chocolate before it hardens.

Hard candy: many non-infused hard candies and lozenges currently bear logos or lettering. For example, custom-made sweethearts valentine's candies (see Attachment 9), Skittles (see Attachment 10), Jelly Belly Jelly Beans (see Attachment 11), and many throat lozenges (see Attachment 12) bear symbols. These examples demonstrate that marking hard candies is "possible to perform." As such, Smart Colorado proposes that all hard candies (e.g. suckers, lozenges, etc.) be marked using one of the following methods: (1) airbrushing the standard symbol on the candy using a stencil and organic or nonorganic food coloring; (2) use of a mold to imprint the standard symbol on the candy. Again, custom candy molds are available online through multiple manufacturers. Representatives of Smart Colorado reached out to custom candy mold manufacturers and determined that 10 molds, each containing 12

cavities (for a total of 120 cavities), can be purchased for approximately \$900; (3) use of a stencil or branding instrument to imprint the standard symbol on the candy before it hardens.

Soft candy: existing marijuana products manufacturers are currently making soft candy/gummies that bear a logo. For example, Incredibles Gum-e products bear a raised “e.” (see Attachment 13). Furthermore, many non-infused soft candies also bear logos or lettering. For example, Pontefract gummies bear both lettering and a logo (see Attachment 14). These examples demonstrate that marking gummies and other soft candies is “possible to perform.” As such, Smart Colorado proposes that all soft candy/gummies be marked using one of the following methods: (1) airbrushing the standard symbol on the candy using a stencil and organic or nonorganic food coloring; (2) use of a mold to imprint the standard symbol on the candy. Again, custom candy molds are available online through multiple manufacturers. Representatives of Smart Colorado reached out to custom candy mold manufacturers and determined that 10 molds, each containing 12 cavities (for a total of 120 cavities), can be purchased for approximately \$900; (3) use of a stencil or branding instrument to imprint the standard symbol on the candy.

Finally, Smart Colorado proposes that the presence of marijuana in **bulk foods** (e.g. nuts, popcorn, cereal, granola and trail mix), **liquids** (e.g. coffee, juice soft drinks, tea, sauces, and cooking oils), and **pills** be symbolized with a standard color.

Symbols come in a variety of forms. Because HB 1366 does not define the term “symbol” or prescribe the form of symbol MED must employ, we again must turn to the dictionary definition to ascertain the plain meaning of the term “symbol.” *Marks v. Koch*, 284 P.3d 118, 123 (Colo.App.2011); *People v. Connors*, 230 P.3d 1265, 1267 (Colo.App.2010). “Symbol” is defined in Webster’s Third New Dictionary as “a visible sign of something invisible.” Here the standard color selected by MED would be a visible sign of something invisible—the presence of marijuana in food products.

The standard color can be developed to be unique, and unlike other colors that appear in existing food products.

There are several examples of colored bulk foods attached to this comment (See attachment 15). These examples demonstrate that marking bulk items is “possible to perform.”

Additionally, symbolizing the presence of marijuana in bulk items, liquids and pills with a color can be accomplished without imposing much difficulty or expense on manufacturers. Coloring bulk items and liquids would merely require application of organic or nonorganic food coloring. Manufacturers can use an airbrush tool to apply the standard color to bulk items, and simply apply the standard color to liquids during the production process. Marijuana pills are currently marketed in a variety of colors (see Attachment 16), which indicates that pills can also be produced in the standard color developed by MED.

III. Both the public and edibles manufacturers are better served by meaningful regulation of edible products

Following the passage of Colorado’s Amendment 64, there was uncertainty as to whether the federal government would move to prevent its implementation. To some extent, this question was answered in August 2013, when the United States Justice Department (“DOJ”) issued the “Cole Memo” to federal law enforcement authorities. The intent of the Cole Memo was to allow Colorado’s marijuana legalization experiment to move forward, while also providing guidance regarding federal civil and criminal enforcement authority under the Controlled Substances Act (the “CSA”).

The Cole Memo reiterated DOJ’s commitment to enforcing the CSA consistent with Congress’ determination that marijuana is a dangerous drug that affords significant revenue to criminal enterprises, gangs and drug cartels. The memo also made it clear that the federal government would utilize its law enforcement resources to focus on eight enumerated priorities related to the trafficking of marijuana. First among those priorities was “preventing the distribution of marijuana to minors.” The memo advises federal

law enforcement agencies “to focus their enforcement resources and efforts, including prosecution, on persons or organizations whose conduct interferes with any one” of the enumerated priorities.

Since the Cole Memo was issued, federal law enforcement authorities have drawn connections between marijuana-infused edible products and the Cole Memo’s enforcement priorities.

In April of this year, during a U.S. Senate Judiciary Committee hearing, Senator Orrin Hatch of Utah asked the Administrator of the Drug Enforcement Administration (the “DEA”), Michele Leonhart, the following question regarding edible marijuana products:

“[N]ow we see innocent looking edibles such as cookies or what even appears to be candy... I have here in my hand an alert bulletin from the Colorado Information Analysis Center dated March 19, 2014. It says that there’s been an increased amount of marijuana-infused products sold to the public, and that these products include fruit chews, cupcakes, and even butter and banana bread... Ms. Leonhart, I think the inevitable result of this trend will be increased use, abuse and addiction. Do you share my concerns on this?”

DEA Administrator Leonhart responded as follows:

“You have a right to be concerned and as law enforcement officers we’re very concerned about that, especially when we see some of these edibles... [T]he people who are making them and selling them are calling them “adult gummy bears” but you can’t even tell the difference between kids’ gummy bears and those laced with... marijuana. So we’re very concerned. It was one... of the reasons why the Department of Justice in the [Cole Memo] with those 8 factors and they have... factors in there related to kids—selling to kids. It’s another reason why they put that memo out in anticipation that the states that pass legalization will put in place aggressive—not just on paper—but real, aggressive oversight, regulatory systems... to take care of that. And we are very concerned about these edibles... The person we heard about—the young student who jumped out a window after eating the cookie which was... 7 or 8 servings, not just one. [We]’re concerned about all of that...”

DEA Administrator Leonhart makes two points that should be of particular significance to MED in the midst of this rulemaking.

First, Administrator Leonhart states that the DEA is “very concerned” by marijuana-infused products that cannot be distinguished from regular food products. In describing her concern, she references gummy bears, a product that is particularly appealing to children. She then makes a direct connection between edible products and the Cole Memo’s enforcement priorities, namely distribution to minors.

Second, Administrator Leonhart draws a connection between edibles and the need for a “real, aggressive oversight [and] regulatory system,” that exists “not just on paper” but in practice. The Cole Memo states explicitly that the federal government’s abstention from robust enforcement of the CSA “rests on [DOJ’s] expectation that states... that have enacted laws authorizing marijuana-related conduct will implement strong and effective regulatory and enforcement systems that will address the threat those states’ laws could pose to public safety, public health, and other law enforcement interests.” The memo goes on to say that “[a] system adequate to that task must not only contain robust controls and procedures on paper; it must also be effective in practice.”

In light of the DEA Administrator’s concern over edibles, and the connection she drew between these products and the need for an aggressive regulatory system that exists “not just on paper,” it seems as though implementation and enforcement of meaningful product identification requirements could be critically important to the continued vitality of edibles manufacturers.

Right now, HB 1366 only exists on paper. Utilizing this rulemaking to implement "strong and effective" regulations that will address threats to public safety and public health is an essential step to demonstrating to the federal government that federal intervention may not be necessary. Furthermore, meaningful regulation of "look-a-like" edible products may help preclude the need for enforcement action against product manufacturers. Should MED neglect its obligations under HB 1366 by implementing watered-down requirements, this area seems ripe for potential federal enforcement activities.

IV. Conclusion

In drafting rules required by HB 1366, MED must abide by the plain letter of the law and the General Assembly's intent behind enacting that law. Here, the law requires edible products to bear a symbol when it is "practicable." The plain and ordinary meaning of the term "practicable" is "possible to...perform; capable of being...done." Again, this is the standard MED must use to determine whether applying a symbol to various edible products is "practicable," and therefore required under HB 1366. If it is possible, by any means, to apply a symbol to an edible product, manufacturers must do so.

Smart Colorado has offered a responsible and balanced approach to requiring that edible products are clearly identifiable. In all instances, Smart Colorado has proposed methods of marking products that are possible to perform and capable of being done. Undoubtedly, manufacturers will incur costs and challenges in applying symbols to their products. But contrary to arguments from the industry, that fact is not dispositive. The true measure of when MED's regulations are too onerous is whether the actions required to comply with the regulations would force the "reasonably prudent businessperson" to forego operating a products manufacturing facility. Given the economic opportunities inherent in the edibles market, there can be no question that shrewd businesspeople will be eager to enter Colorado's edibles market in spite of the cost of marking products.

Attachment 1



Attachment 2



Attachment 3

Category	Type	Description	Method of Marking
Baked Goods	Cookies	Cream filled oatmeal sandwich	(1) airbrushing the standard symbol on the cookie using a stencil and organic or nonorganic food coloring; (2) use of a mold into which cookie batter can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the cookie after it has been baked and before it hardens; or (4) application of frosting in the shape of the standard symbol.
Baked Goods	Cookies	Gingersnaps	(1) airbrushing the standard symbol on the cookie using a stencil and organic or nonorganic food coloring; (2) use of a mold into which cookie batter can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the cookie after it has been baked and before it hardens; or (4) application of frosting in the shape of the standard symbol.
Baked Goods	Cookies	Gluten free peanut butter	(1) airbrushing the standard symbol on the cookie using a stencil and organic or nonorganic food coloring; (2) use of a mold into which cookie batter can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the cookie after it has been baked and before it hardens; or (4) application of frosting in the shape of the standard symbol.
Baked Goods	Cookies	Oatmeal butterscotch	(1) airbrushing the standard symbol on the cookie using a stencil and organic or nonorganic food coloring; (2) use of a mold into which cookie batter can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the cookie after it has been baked and before it hardens; or (4) application of frosting in the shape of the standard symbol.
Baked Goods	Cookies	Oatmeal raisin	(1) airbrushing the standard symbol on the cookie using a stencil and organic or nonorganic food coloring; (2) use of a mold into which cookie batter can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the cookie after it has been baked and before it hardens; or (4) application of frosting in the shape of the standard symbol.
Baked Goods	Cookies	Oatmeal, dark chocolate and cranberries	(1) airbrushing the standard symbol on the cookie using a stencil and organic or nonorganic food coloring; (2) use of a mold into which cookie batter can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the cookie after it has been baked and before it hardens; or (4) application of frosting in the shape of the standard symbol.
Baked Goods	Cookies	Orange Peel, Chocolate Butterscotch Chip	(1) airbrushing the standard symbol on the cookie using a stencil and organic or nonorganic food coloring; (2) use of a mold into which cookie batter can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the cookie after it has been baked and before it hardens; or (4) application of frosting in the shape of the standard symbol.
Baked Goods	Cookies	Peanut butter M&M	(1) airbrushing the standard symbol on the cookie using a stencil and organic or nonorganic food coloring; (2) use of a mold into which cookie batter can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the cookie after it has been baked and before it hardens; or (4) application of frosting in the shape of the standard symbol.
Baked Goods	Cookies	Peanut Butter Sandwich	(1) airbrushing the standard symbol on the cookie using a stencil and organic or nonorganic food coloring; (2) use of a mold into which cookie batter can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the cookie after it has been baked and before it hardens; or (4) application of frosting in the shape of the standard symbol.
Baked Goods	Cookies	Salted white chocolate macadamia nut	(1) airbrushing the standard symbol on the cookie using a stencil and organic or nonorganic food coloring; (2) use of a mold into which cookie batter can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the cookie after it has been baked and before it hardens; or (4) application of frosting in the shape of the standard symbol.
Baked Goods	Cookies	White chocolate macadamia nut	(1) airbrushing the standard symbol on the cookie using a stencil and organic or nonorganic food coloring; (2) use of a mold into which cookie batter can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the cookie after it has been baked and before it hardens; or (4) application of frosting in the shape of the standard symbol.
Baked Goods	Granola Bar	Almond	(1) airbrushing the standard symbol on the granola bar using a stencil and organic or nonorganic food coloring; or (2) use of a stencil or branding device to imprint the standard symbol on the bar.
Baked Goods	Granola Bar	Blueberry Pie	(1) airbrushing the standard symbol on the granola bar using a stencil and organic or nonorganic food coloring; or (2) use of a stencil or branding device to imprint the standard symbol on the bar.
Baked Goods	Granola Bar	Cherry chocolate kola	(1) airbrushing the standard symbol on the granola bar using a stencil and organic or nonorganic food coloring; or (2) use of a stencil or branding device to imprint the standard symbol on the bar.
Baked Goods	Granola Bar	Chia seeds, orange, cranberry	(1) airbrushing the standard symbol on the granola bar using a stencil and organic or nonorganic food coloring; or (2) use of a stencil or branding device to imprint the standard symbol on the bar.
Baked Goods	Granola Bar	Chocolate peanut butter	(1) airbrushing the standard symbol on the granola bar using a stencil and organic or nonorganic food coloring; or (2) use of a stencil or branding device to imprint the standard symbol on the bar.
Baked Goods	Granola Bar	Cinnamon apple pie	(1) airbrushing the standard symbol on the granola bar using a stencil and organic or nonorganic food coloring; or (2) use of a stencil or branding device to imprint the standard symbol on the bar.
Baked Goods	Granola Bar	Cinnamon, apples, peach, apricot	(1) airbrushing the standard symbol on the granola bar using a stencil and organic or nonorganic food coloring; or (2) use of a stencil or branding device to imprint the standard symbol on the bar.
Baked Goods	Granola Bar	Cranberry, orange zest, white chocolate chip Blondie	(1) airbrushing the standard symbol on the granola bar using a stencil and organic or nonorganic food coloring; or (2) use of a stencil or branding device to imprint the standard symbol on the bar.
Baked Goods	Granola Bar	Ginger & cashew	(1) airbrushing the standard symbol on the granola bar using a stencil and organic or nonorganic food coloring; or (2) use of a stencil or branding device to imprint the standard symbol on the bar.
Baked Goods	Granola Bar	Granola, Honey, vanilla, coconut oil,	(1) airbrushing the standard symbol on the granola bar using a stencil and organic or nonorganic food coloring; or (2) use of a stencil or branding device to imprint the standard symbol on the bar.
Baked Goods	Granola Bar	Honey Nut, Gluten free	(1) airbrushing the standard symbol on the granola bar using a stencil and organic or nonorganic food coloring; or (2) use of a stencil or branding device to imprint the standard symbol on the bar.
Baked Goods	Granola Bar	Spiced pumpkin, white chocolate chips, white chocolate & sprinkles	(1) airbrushing the standard symbol on the granola bar using a stencil and organic or nonorganic food coloring; or (2) use of a stencil or branding device to imprint the standard symbol on the bar.
Baked Goods	Pastry	Chocolate baklava	airbrushing the standard symbol on the pastries using a stencil and organic or nonorganic food coloring.
Baked Goods	Pastry	Chocolate hazel Baklava	airbrushing the standard symbol on the pastries using a stencil and organic or nonorganic food coloring.
Baked Goods	Pastry	Nuts/Traditional Baklava	airbrushing the standard symbol on the pastries using a stencil and organic or nonorganic food coloring.
Baked Goods	Pastry	Peanut Butter Baklava	airbrushing the standard symbol on the pastries using a stencil and organic or nonorganic food coloring.
Baked Goods	Superfood	Go Chi Ball- Fruit, Spices & Herbs	airbrushing the standard symbol on the balls using a stencil and organic or nonorganic food coloring.
Baked Goods	Superfood	Zoom ball - fruit, spices & hers rolled in coconut	airbrushing the standard symbol on the balls using a stencil and organic or nonorganic food coloring.
Bulk Food	Superfood	Pumpkin seeds, Hazel nuts, Oats, Brazil nuts, Hemp seeds, Pecans, Almonds, Sunflower seeds, Cashews and Walnuts	The presence of marijuana in bulk food items should be symbolized with a standard color. Manufacturers can use an airbrush tool to apply the standard color to bulk items.

Category	Type	Description	Method of Marking
Bulk Food	Cereal	Powder sugar coated rice cereal	The presence of marijuana in bulk food items should be symbolized with a standard color. Manufacturers can use an airbrush tool to apply the standard color to bulk items.
Bulk Food	Crackers	Rosemary Parmesan	airbrushing the standard symbol on the crackers using a stencil and organic or nonorganic food coloring.
Bulk Food	Crackers	Soup crackers	airbrushing the standard symbol on the crackers using a stencil and organic or nonorganic food coloring.
Bulk Food	Loose Granola	Granola mix, oats, cranberries, raisins, maple syrup, almonds and sunflower seeds	The presence of marijuana in bulk food items should be symbolized with a standard color. Manufacturers can use an airbrush tool to apply the standard color to bulk items.
Bulk Food	Nuts	Balsamic peppercorn cashews	The presence of marijuana in bulk food items should be symbolized with a standard color. Manufacturers can use an airbrush tool to apply the standard color to bulk items.
Bulk Food	Nuts	Balsamic peppercorn walnuts	The presence of marijuana in bulk food items should be symbolized with a standard color. Manufacturers can use an airbrush tool to apply the standard color to bulk items.
Bulk Food	Popcorn	Microwave	The presence of marijuana in bulk food items should be symbolized with a standard color. Manufacturers can use an airbrush tool to apply the standard color to bulk items.
Bulk Food	Trail Mix	Crunch. Corn, rice/wheat cereal, pretzels, bagel chips, Snacked nuts and chocolate covered raisins	The presence of marijuana in bulk food items should be symbolized with a standard color. Manufacturers can use an airbrush tool to apply the standard color to bulk items.
Bulk Food	Trail Mix	Roasted Seeds; pumpkin and sunflower	The presence of marijuana in bulk food items should be symbolized with a standard color. Manufacturers can use an airbrush tool to apply the standard color to bulk items.
Bulk Food	Trail Mix	Trail Mix	The presence of marijuana in bulk food items should be symbolized with a standard color. Manufacturers can use an airbrush tool to apply the standard color to bulk items.
Chocolate	Bar	Chocolate - Blueberries Flax & white chocolate	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	Dark	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	Dark Chocolate & Coffee	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	Dark Chocolate & Espresso beans	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	Dark Salted	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	Dark with cinnamon	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	Milk & white chocolate with coconut oil, walnuts & bananas	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	Milk Chocolate	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	Milk Chocolate & Orange	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	Milk Chocolate & Peanut Butter	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	Milk Chocolate & Peppermint	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	Milk Chocolate & Rice crispies	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	Milk Chocolate & Spearmint	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	Milk Chocolate & Toffee, Almonds	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	Mint & Milk Chocolate Dabbas	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	White & Milk Chocolate & Toffee	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	White Chocolate & Fudge Cookies	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	White. Chocolate & Peaches	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	White Chocolate & Pop Rocks	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	White Chocolate & Pretzels,	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.
Chocolate	Bar	White Chocolate & Raspberries	(1) airbrushing the standard symbol on the chocolate using a stencil and organic or nonorganic food coloring; (2) use of a mold into which chocolate can be poured; (3) use of a stencil or branding device to imprint the standard symbol on the chocolate before it hardens.

Attachment 4





Attachment 5



airbrush food color



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12 AMERICOLOR AmeriMist 0.7oz Airbrush Cake Decorating Food Color Kit \$18.96

Included in this kit is Super Black, Royal Blue, Sky Blue, Copper, Lemon Yellow, Leaf Green, Orange, Deep Pink, Violet, Holiday Red, Avocado, and Warm Brown

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12 AMERICOLOR AmeriMist Airbrush .7oz SHEEN PEARL Cake Decorating F... \$23.96

AmeriMist? air brush colors are super strength, highly concentrated spray-on air brush food colors that are extremely effective, even on hard to color non-dairy whipped toppings and icings. AmeriMist?

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AmeriColor Amerimist Electric Color Air Brush Food Color 12 Pack Kit \$16.96

Included in this kit is Super Black, Royal Blue, Sky Blue, Copper, Lemon Yellow, Leaf Green, Orange, Deep Pink, Violet, Holiday Red, Avocado, and Warm Brown

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Super Deluxe CAKE DECORATING AIRBRUSH SYSTEM KIT SET w-Compresso... \$109.96

Super Deluxe Professional Airbrush Cake Decorating System with 2 Master Gravity Feed Airbrushes - Includes the TC-20 Professional Air Compressor plus 12 Popular Americolor AmeriMist™ Airbrush Food

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8 AmeriMist Food Color Cake Decorating Airbrush Kit w/ Air Compressor A... \$73.96

Master Airbrush Model G25 Gravity Feed, and Model TC-16 Professional Air Compressor, 8 Americolor Food Colors, FREE How To Airbrush Book & AmeriColor Sheen ColorTop Selling High Performance Cake

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- Metal
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Type

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- Wet
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- Ground Coffees
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- Bob's Red Mill
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Dual-Action Airbrush CAKE DECORATING AIRBRUSHING KIT with Set of 12...
\$74.96

Complete Master Airbrush Cake Decorating Airbrushing System - Precision Dual-Action Suction Feed Airbrush Set with a Elephant Shaped Compressor plus 12 Popular Americolor AmeriMist™ Airbrush Food

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12 AMERICOLOR Amerimist 4.5oz Airbrush Cake Decorating Food Color Kit
\$99.96

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4 AMERICOLOR AmeriMist 0.7oz Airbrush Cake Decorating Food Color Kit
\$10.96

AMR 503 - Sky Blue Airbrush Color, 0.7 oz. AMR 507 - Lemon Yellow Airbrush Color, 0.7 oz. AMR 511 - Leaf Green Airbrush Color, 0.7 oz. AMR 524 - Holiday Red Airbrush Color, 0.7 oz. AmeriMist? Air Brush

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3 AIRBRUSH CAKE DECORATING SYSTEM KIT Air Compressor Americolor Fo...
\$119.98

Professional Premium Master Airbrush Cake Decorating System with 3 Multi-Purpose Master Airbrushes - Airbrush Models: G22 Gravity Feed, S68 Siphon Feed, E91 Siphon Feed and the TC-20 Professional Air

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CAKE DECORATING AIRBRUSH KIT Compressor w/ 24 Color Americolor Food...
\$239⁹⁶

Deluxe Professional Master Airbrush Cake Decorating System with 2 Master Gravity Feed Airbrushes - Models: G22 Gravity Feed, G76 Pistol Trigger Gravity Feed and the TC-20T Professional Air Compressor

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2 AIRBRUSH CAKE DECORATING KIT Compressor 8 Color Americolor Food...
\$109⁹⁶

Professional Master Airbrush Cake Decorating System with 2 Master Airbrushes - Includes the TC-20 Professional Air Compressor plus 8 Popular Americolor AmeriMist™ Airbrush Food Colors plus a FREE

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CAKE DECORATING AIRBRUSH KIT Air Compressor Americolor 4 Color Foo...
\$68⁹⁶

Basic Master Airbrush Cake Decorating Airbrushing System - Precision Dual-Action Gravity Feed Airbrush Set with a Elephant Shaped Compressor and the 4 Most Popular Americolor AmeriMist™ Airbrush Food

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Pro CAKE DECORATING SYSTEM 3 Airbrush Kit 12 Color Food Coloring Set...
\$117⁹⁶

Professional Premium Master Airbrush Cake Decorating System with 3 Multi-Purpose Master Airbrushes - Airbrush Models: G22 Gravity Feed, S68 Siphon Feed, E91 Siphon Feed and the TC-60 Professional

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Attachment 6

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We keep the master molds in our warehouse for future reorders. When placing a reorder, just call or email your request in and we will usually ship the next day. The only cost there is will be a jig set up of 25.00 and the price of the additional molds plus shipping. 10% sales tax applies to California residents.

We also produce silicone molds which can be used for chocolate or hard candy. Silicone is great for really fine detail. Call for pricing

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Attachment 7



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Attachment 8



Attachment 9



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Step 2

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Step 3

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Step 4

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Attachment 10



Attachment 11



Attachment 12



Attachment 13

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April 2014

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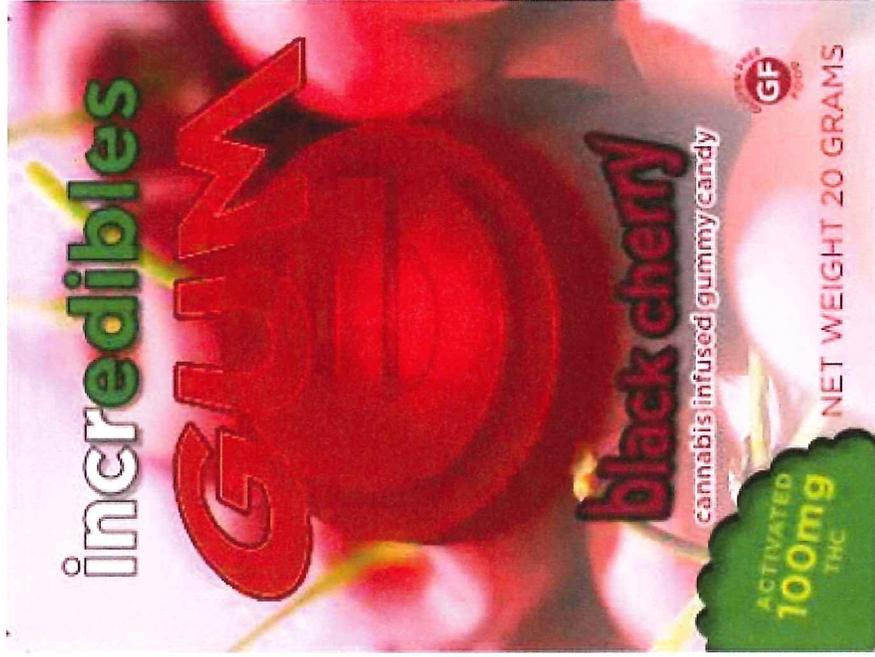
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Gum e – Blue Raspberry



Blue Raspberry Gum e
with 100mg THC and
100mg of Vitamin C.

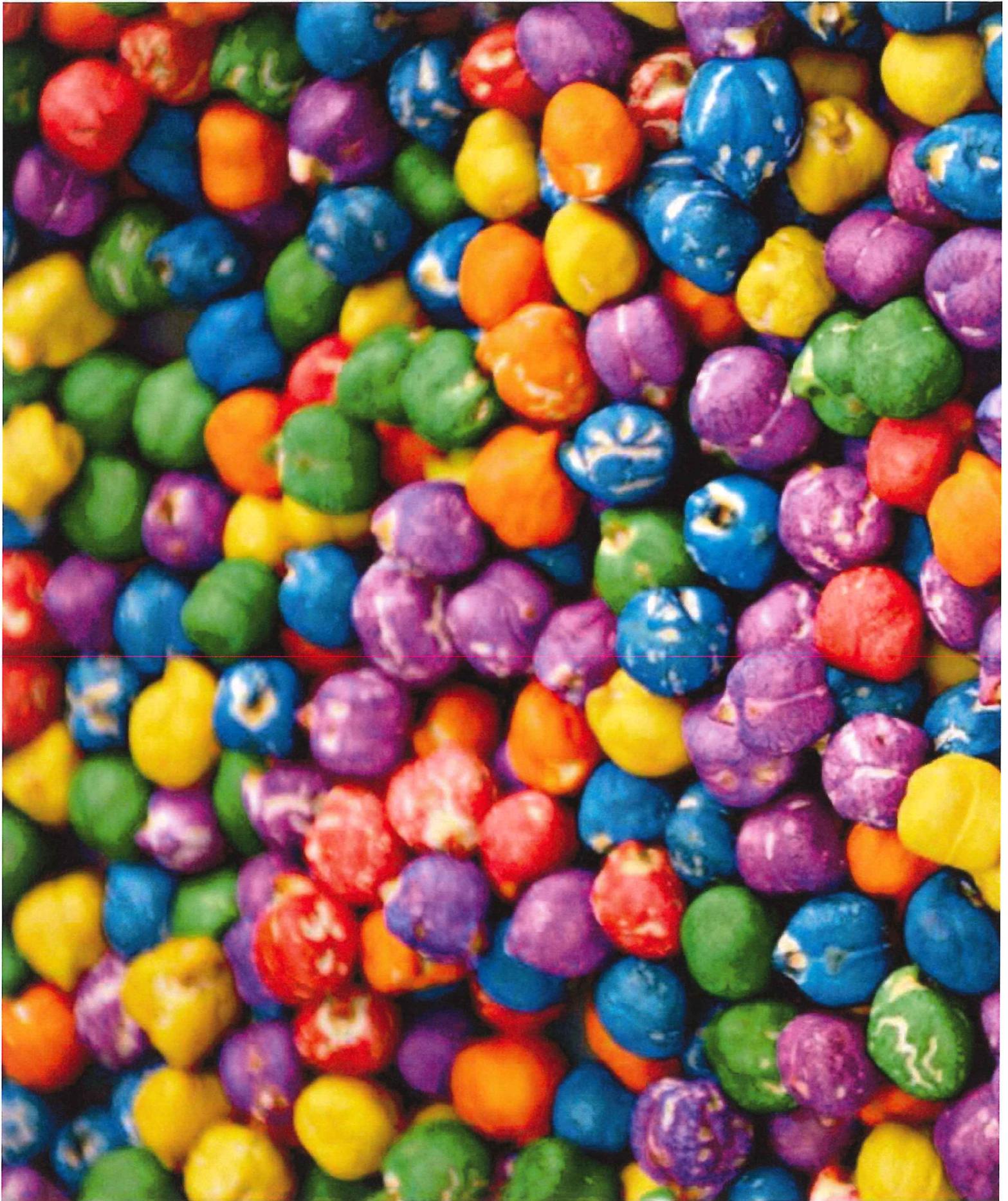
Attachment 14



Attachment 15









Attachment 16

★★★★★



Wonderlands Green



View

★★★★★

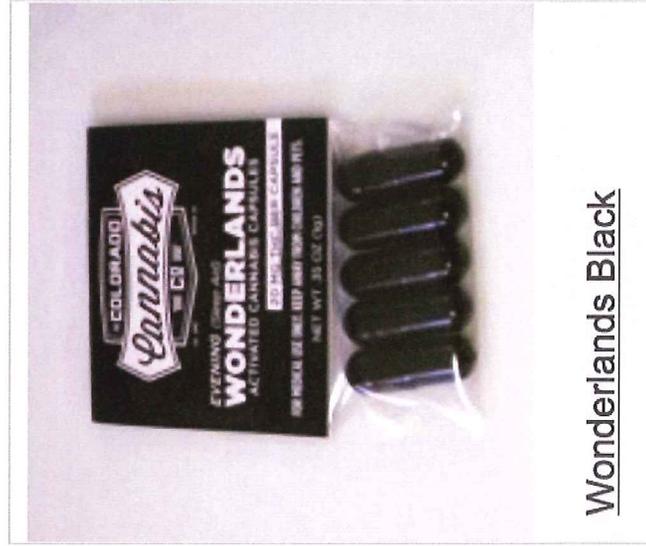


Wonderlands Red



View

★★★★★



Wonderlands Black



View

★★★★★



Wonderlands White