

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

1. **Work Group Sponsor (s):** **Bob Eschino**

2. **Describe the Recommendation:** **I recommend waiting to see if the rules already in place are sufficient enough to have the desired effect. If not, I suggest we only change labeling and push education as the next step. Child resistant packaging is required and stamping and shaping are impracticable.**

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?**

I believe the rules already in place are working. We have not heard of any issues since April except for a few cases of accidental ingestion. We have run some numbers with the data that we know and we are at a .00188% accidental ingestion rate.

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.**

Transparent-New labeling rules should be very transparent and easy to inspect

Systematic-New labeling will be planned and repeatable

Operable-We are all currently labeling and will be able to make the needed changes

Defensible-We can work together to come up with the new wording and symbol

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

The legal adult consumer will have a better understanding of serving size and potency. With the proper education, the adult consumer will be better able to properly consume edibles. The child resistant packaging should help to keep the products out of the hands of children.

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

This should help make items readily identifiable to the general public and help with accidental ingestion.

- 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.**

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

- 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?**

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

There will be additional costs in redesigning labels as well as waste from labels we don't use. The cost will be minimal to the manufacturers around \$2000-\$3000

If you have printed packaging, this cost could be quite large if the manufacturer is not allowed to work through current inventory. There would also be a large cost to redesign printing plates. These costs could get into the \$30,000-\$40,000 range or higher depending on plate costs and the costs of packaging that will need to be destroyed.

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

A change in labeling will be 60-90 days if you are just talking labels. If you are dealing with printed packaging, this could take 6-12 months to work through current inventory and order new products.