



Public Comment for:

Connecticut Department of Consumer Protection  
Proposed Regulation  
Concerning the Palliative Use of Marijuana

Testimony of:

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Hello and thank you Commissioner Rubenstein, Department of Consumer Protection staff and Members of this Board. My name is Meg Sanders and I am CEO of Gaia Plant Based Medicine, which is a medical marijuana company based in Denver Colorado, with dispensary locations throughout the state. By way of background, I have 20+ years in retail and non-profit business leadership and extensive management experience in financial compliance for private equity companies. An active industry leader, I serve as an Executive Board Member for Cannabis Business Alliance (CBA) I am a member of the Chambers of Commerce in each of my license locations in Colorado. Recently I served as the only industry representative appointed to Governor Hickenlooper's 24-Member Amendment 64 Task Force, charged with implementing the adult recreational use of marijuana.

I have played an integral role in drafting laws, current legislation, ordinances, rules and regulations from local to state level and I am excited to speak before you today. The draft regulations before us clearly represent the hard work and thoughtfulness of the DCP and I thank all who worked on getting this done. It is overall a tremendous piece of work and I have just a few points I would like to cover along with some possible suggestions.

Testing and Laboratories.

According to the regulations, one major factor on which the implementation of this law hinges is the existence of suitable laboratories within the private sector who are willing to take on testing for the medical marijuana industry. I hope there will be those businesses, but for producers and dispensers to stake the millions of dollars on their company without a backup plan in place for the state in case no such laboratories can meet the criteria set forth herein, is a very big risk. It is imperative that the Commissioner have sufficient discretion to implement testing requirements as testing facilities become available, are able to prove consistent results, are capable of meeting tight turn around times to ensure product gets to market.

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LEGAL DIVISION  
CONSUMER PROTECTION

Testing as related to brand naming.

I am extremely pleased to see the implementation of brand naming in these regulations as I think it will lead to a better educated consumer and protect the hard genetic work that is going on with very little legal protections. However, the limitations of 97% to 103% for key ingredients such as THC, THCA, CBD, and CBDA are overly restrictive and those deviations could occur within the same plant and certainly from batch to batch. As long as the THC, THCA, CBD and CBDA are listed from a batch sample and the patient knows the characteristics of a registered brand, the spirit of what I believe are the goals of this provision would be protected. Certifications from the producers that the genetics used are the same as those that were registered should be relied upon with as much certainty as any other certification from the producer to the DCP.

DCP Administration.

I have seen firsthand how extremely important it is for the industry to be a strong partner with the State and their enforcement division and the key to that is a smooth and steady flow of communication and mandated data between the two. Submission of unnecessary paperwork hurts everyone involved. I would suggest you limit the threshold for background checks to those with either direct control over a business and employees and persons with a financial interest of at least 5%. This would certainly satisfy the watching of the watchers and allow a greater focus on those who could actually impact business. This can easily be addressed in the definitions section by redefining "Dispensary Facility Backer," "Financial Interest," and "Producer Backer." I do not believe this limitation should apply to the physician section; I agree with the restrictions on ownership.

On Fees, the addition of the section allowing for adjustments of fees to ensure financial stability for the administration of the program is a good one and I only ask that the Commissioner consider adjusting lower as well as higher whenever necessary.

Escrow.

I can sum up my comments on the escrow with three words: greater Commissioner discretion. As I am sure you are all aware, the medical marijuana industry has a difficult time dealing with financial institutions, so discretion should be used on what constitutes a financial institution, so long as the Commissioner is satisfied that the interests of the State are protected. On the releasing and taking of funds, we also ask that the Commissioner have greater discretion. The hard dates of two and five years locks up a significant amount of capital for a long period of time, whereas the Commissioner will know much sooner than those dates as to whether a producer is operating successfully and in a manner that positively impacts the patients and the program.

## Dispensaries.

On the initial selection of the amount and location of dispensaries based on patient population, I ask that the DCP take into account the anticipated patient population and leave a great deal of the risk to the dispensary owners. High population centers are not necessarily the best or most desirable places for some business owners and the perfect place for others. Further, business plans are being drawn up and work being done on a stabilized market model, not the numbers of patients being registered while a black market is still the only one that exists.

Dispensaries should be allowed to have loose marijuana flowers available for inspection and selection. It is important to patients. That marijuana should not be for sale and should be returned to the producer for tracking and destruction after a period of time.

## Dispensary employees.

The number of employees at a dispensary should be determined by actual need. If anything, a minimum number of staff should be mandated, not a maximum number.

Notifications on changes in employee information in Section 21a-408-18(b) should be done on a monthly or quarterly basis.

Dispensary technicians seem to be limited in what they can and cannot say or discuss with patients. Our consultants are not doctors and never give that advice, but they are extremely knowledgeable about the plant, are constantly kept up to date on products and communication at the dispensary should only be encouraged.

## Ancillary Products.

The processing of ancillary products takes a tremendous up-front capital expense as well as a steady supply of usable plant materials for processing. To ensure a greater diversity of non-flower products, I encourage the Department to allow for transferring of plant material between producers for processing purposes only. The producer that is processing would return the corresponding amount of processed material and would charge a fee for doing so. Ensuring non-smoked alternatives, edibles, topicals and the like are available to the patient population was certainly a goal of the legislature and this minor change will help make sure that happens.

## Minor changes:

21a-408-34(g) - Reference to opaque "bag" at dispensary. We request that be changed to the more general "packaging"

21a-408-35(d) - Prohibits consumption of food or beverages at dispensary facilities by qualifying patients and caregivers. We ask that this be removed. We strive to make our

patients comfortable and being able to offer persons suffering from debilitating conditions beverages or snacks while they wait is the least we could do. Further, we routinely host support group or other community meetings and we would like to do so in Connecticut as well.

21a-408-50(b)(1) and (10)- References the DEA and I want to be sure that is feasible to do.

21a-408-53(c)(3) - Pocketless clothing. We ask that this refer only from the point of harvest on. Those working in the actual grow routinely have their pockets or aprons filled with any number of clippers, tools, ties, etc. and are integral and trusted members of our team. I recommend that certain employees in designated areas only need wear pocketless clothing.

Thank you very much for your time and I would be more than happy to answer any of your questions.