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Filed via CDFA.CalCannabis_Appellations@cdfa.ca.gov on October 19th, 2020

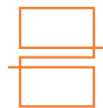
California Department of Food and Agriculture (CDFA)
Attention: Kristi Armstrong
CalCannabis Cultivation Licensing
Proposed Appellations Regulations
P.O. Box 942871
Sacramento, CA 94271

Re: October 2nd, 2020 Notice of Modifications to the Proposed Regulations for the CAP

Dear Ms. Armstrong:

Origins Council (OC) is a California nonprofit education, research, and advocacy organization. We are dedicated to supporting the legacy cannabis producing regions of California through education and research programs, sustainable rural economic development initiatives, research driven policy advocacy, and the development of a legal geographical indication system for cannabis.

Origins Council is partnered with regional trade associations representing the legacy producing regions of California: the Trinity County Agricultural Alliance, the Mendocino Cannabis Alliance, the Sonoma County Growers Alliance, the Nevada County Cannabis Alliance, and the Big Sur Farmers Association. In matters related to cannabis geographical indications, OC collaborates with the Humboldt County Growers Alliance and the International Cannabis Farmers Association. Collectively, these organizations have collaborated on the technical analysis and the coalition comments of the revised regulations presented here.



HUMBOLDT COUNTY
GROWERS ALLIANCE



Our comments will address the modifications to the proposed regulations and the Initial Statement of Reason for the Cannabis Appellations Program (CAP). We also will underscore very important issues raised in our prior comment letter that you have not summarized or responded to. One critical issue that we regard as fundamental to the program is the need for consensus among appellation petitioners on the name, boundary, standards, practices, and cultivars of the particular appellation. We had expected an explanation of why the department is not requiring a majority of outdoor licensed cultivators to sign an appellation petition, as we recommended. We understand that such explanations may be set forth in the Final Statement of Reasons, but without knowing the department's reasoning now, we cannot respond effectively to your proposed modifications.

Our specific recommendations and requests for clarification are italicized in bold for emphasis and ease of reference. We thank you for the opportunity to comment.

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Comments Pertaining to Proposed Revisions

1. Terroir-Based Causal Link

On September 30th, 2020 Governor Newsom signed Senate Bill 67, establishing CAP as the world's first terroir-based cannabis program. SB 67 ensures that appellations established through CAP are premised upon evidence of terroir-based causal link(s) between the qualities or characteristics of the cannabis and the geographical area in which it was produced, including human **and** natural factors. This is accomplished through the introduction of the following statewide qualifying criteria for appellation approval in Business & Professions Code 26063(c):

An appellation of origin shall not be approved unless it requires the practice of planting in the ground in the canopy area and excludes the practices of using structures, including a greenhouse, hoop house, glasshouse, conservatory, hothouse, and any similar structure, and any artificial light in the canopy area.

The revised regulations strengthen the terroir-based causal link premise in a number of ways, but they also retain provisions from the initial draft regulations that are in direct conflict with this fundamental premise.

Because of the critical importance of this state-legislated terroir baseline for cannabis appellations, we have organized our comments regarding a number of related subtopics under this overarching topic.

Essentially or Exclusively

We enthusiastically support the addition of “essentially or exclusively” to Sec. 9106(d). This language fundamentally strengthens the terroir-based causal link premise of CAP, in line with the intent of Senate Bill 67.

The Role of Reputation Evidence

Reputation alone cannot justify the establishment of an appellation of origin. The key criterion that must be proved is that the natural environment where the cannabis is grown, including all the geographical features outlined in 9106(a), essentially or exclusively affects the quality or characteristics of the cannabis grown there. This was the intent of SB 67, which established statewide criteria for qualifying crops to ensure that terroir-based causal link claims are defensible and that all appellations designations issued by the agency strengthen the program and the value of California cannabis appellations in the marketplace.

If enacted, these reputation-based appellations would fundamentally contradict the premise of SB 67, turning SB 67's in-ground, full-sun baseline from a critical cornerstone of a terroir-based framework into an arbitrary restriction on cannabis farmers. Reputation can support the petition but is not sufficient in and of itself to justify the establishment of an appellation.

We recommend striking “reputation” from Sec. 9106 (d), and revising it to read: “A description of the quality or characteristics of the cannabis which is essentially or exclusively caused by the geographical features,

including an explanation of how the geographical features cause the cannabis to have that quality or characteristic.”

The reference below to cultural features, including reputation, should be tied to the cannabis and not simply to cannabis cultivation.

We recommend that Sec. 9106(a)(5) with respect to the required evidence in an appellation petition be revised to read: “Cultural features which may include geographical boundaries associated with a history or reputation of cannabis and cannabis cultivation, the distribution of a specific set of cultivation practices, and anthropogenic features.”

9102(h) requires “[a] description and evidence of the legacy, history, and economic importance of cannabis production in the area.” This regulation ensures that the historic and cultural significance of cannabis production is appropriately acknowledged in approved appellations. This requirement, if implemented in tandem with the provisions described elsewhere that support the terroir-based causal link premise of the program, would ensure that California cannabis appellations are reserved for regional cannabis which has been authentically influenced by the confluence of environmental and cultural factors over time.

Appellation Boundaries

Sec. 9105(b)(1) provides that an appellation of origin cannot “be based solely on the political entity lines of a single county.” That implies that an appellation of origin cannot be a single county, but it might leave open the option of a multi-county appellation.

We propose amending Sec. 9105(b) to prohibit appellations of origin “based solely on the political entity lines of a single county or counties.”

California cannabis appellations of origin should be based on evidence presented in appellation petitions that substantiates and protects the causal link between the qualities or characteristics of the cannabis and its natural environment. This leads us to oppose the establishment of appellations of origin for regions such as the Emerald Triangle that are based on political boundaries and can only demonstrate a commonality of reputation and not a shared geographical causal link to product quality. Such regions are certainly deserving of a geographical indication, and we would support the expansion of county of origin designations to allow for multi-county designations with names based on historic evidence of use, such as the Emerald Triangle.

Causal Link

We appreciate the revisions to the regulations tying the causal link to the cannabis rather than the cannabis cultivation, and we support the use of the term “produced” where applicable. However, in reading the ISOR discussion regarding this change, the agency omits what we regard as the fundamental reasoning for this change: the terroir baseline, whereby the natural environment directly influences some quantifiable quality or characteristic(s) of the cannabis itself. Referring to Sec. 9102(f) the ISOR states:

Replaced the word “cultivation” with the word “produced” to clarify that an appellation petition must contain a description and evidence of distinctive geographical features that affect the cannabis produced in the geographical area pursuant to Business and Professions Code section 26063, subdivision (b).

Sec. 9106(e) has been revised to require that the petitioner identify “at least one specific standard, practice, or cultivar which acts to preserve the distinctiveness of the geographical feature and maintain its relevance to the cannabis.” We are concerned that phrases like “preserve the distinctiveness” and “maintain relevance” are too weak to encompass the causal link between place and product. Additionally, requiring only one specific standard, practice, or cultivar to satisfy this requirement is insufficient to capture and maintain the causal link.

In order to address these concerns, we recommend that Sec. 9106(e) be amended to read: “Identification of at least one specific standard and one specific practice requirement which acts to preserve the essential or exclusive causal link between the quality or characteristics of the cannabis and the geographical features.”

Soil as a Geographical Feature

We are pleased to see the addition of Sec 9106(a)(3) to Geographical Features: “Soil features which may include microbiology and soil series or phases of a soil series.”

However, we are concerned by the following ISOR language regarding this revision: “For clarity and consistency with federal wine appellation regulations, an example category of geographical information describing soils has been added in response to comments expressing that this additional language is expected in context, although this revision to the proposed regulation does not alter petition review.”

Once again, we would like to underscore the intent of SB 67, which is to ensure that California cannabis appellations are premised upon evidence of a causal link between some quantifiable quality or characteristic of the cannabis and its geographical origin, including natural and human factors. Specifically, SB 67 requires qualified appellation cannabis to be planted in the ground, underlying the critical importance of soils in the causal link between place and product.

This soil criterion will be critical to substantiating and evaluating terroir-based causal link claims put forward in petitions. Accordingly, if this criterion ties into the petition’s specific terroir-based causal link claim(s), this provision can and should impact the petition review process considerably.

Petition Review Panel

Fundamental to a proper discretionary review of appellation petitions is the appropriate expertise to evaluate petitions in the following respects: completeness; standard, practice, and cultivar criteria; and the substance and strength of the terroir-based causal link claim(s). The draft regulations propose that CDFA “may” establish a petition review panel. We feel strongly that this panel is essential to the integrity of the program and should be mandated within the regulations, established, and in place before the agency receives petition submissions.

We recommend that Sec. 9300(a) be amended to read: “The department shall establish a Petition Review Panel to assist the department with review of petitions.”

The regulations propose that one way to satisfy cultivar requirements in an appellation petition is “cultivar identity certification with identified limits on acceptable methods, vendors, and practices.” Given the nascent field of cannabis cultivar identity certification, we request that CDFA provide a cultivar registration

process for petitioners that follows well established and defined international conventions, standards, and procedures. Cultivar registration provides an opportunity to identify and file substantiating data for cultivars that preserve the essential link between the product's quality or characteristics and the place of origin.

In order to support CDFA in conducting an expert review of applications for cannabis cultivar registrations, CDFA should earmark part of its budget to hire or contract with a cannabis botanist to serve as a petition review panelist and to support cultivar registrations.

Sec 9301(d) has been revised to read: "Members of the panel shall have relevant experience in geography, cannabis cultivation, intellectual property, sustainable agriculture, or community-based research, or other areas determined necessary by the department."

We reiterate our previously submitted concern that petition review panelists should be subject matter experts, not simply individuals experienced in a given field. We support the proposed revision that affords the agency discretion to include additional areas of expertise to the petition review panel as needed. Given the addition of soil criteria to petition requirements, we recommend the addition of an expert in soil science to the petition review panel.

We recommend amending Sec. 9301(d) to read: "Members of the panel shall have expertise in cannabis cultivation, cannabis botany, soil science, natural sciences, sustainable agriculture, geographical indication law, cultural anthropology, and community-based participatory research, or other areas determined necessary by the department."

The review panel would benefit from greater participation by cannabis cultivators who can provide the agency and the review panel with a deeper understanding of the profound diversity of cannabis products, cultivation practices, standards, and cultivars.

For this reason, we recommend that (1) the number of cannabis cultivator seats on the Petition Review Panel be expanded to three, and (2) the cannabis cultivation expert seats rotate more frequently than those of the other subject matter experts.

There is no formal process for nominating the Petition Review Panelists. We request that this process be defined. We recommend that outdoor cultivation licensees be entitled to nominate panelists or serve on the panel. Those panelists would recuse themselves from any discussion of a petition for an appellation in which they have a licensed farm.

We believe strongly that the approval of high-quality petitions with defensible causal links should be a top priority in the initial rollout of the appellation program, even if establishing the systems to make this possible require a slower implementation of the program. If the first petitions approved under the appellation system are of poor quality, it will set a precedent that cannot be undone.

Section 26063 of the Business and Professions Code mandates the agency to establish a process by which licensed cultivators may establish appellations of origin by January 1, 2021. As a part of establishing that process, we recommend that the agency consider accepting petitions no sooner than January 1, 2022, in order to allow time for the agency to create a discretionary review process and establish the panel of experts to effectively evaluate causal link determinations as well as standards, practices, and cultivar

criteria. This also will afford petitioners the time to build consensus among cultivators within the appellations on the required standard, practices, and cultivars.

This timeline would protect against a rush-to-market mentality that could result in chaos after the CAP regulations take effect and ensure that the legacy farming communities that have been impacted by COVID, wildfires, and licensing issues are better positioned to develop petitions, with a full understanding of the process and criteria around which to build their petitions. It also would allow cultivators extra time to develop consensus on the appellation boundaries, name, cultivars, standards, and practices which we regard as an essential building block of a successful CAP. We reiterate the importance of consensus among appellation petitioners below.

2. Petition Fee, Review & Approval Process

Fees

Sec. 9101(a)(1) and (2) have been amended, lowering the petition and amendment fees, each by 18%. The fees also have been broken up into two parts: a 17% petition submission fee and a petition approval fee for the remainder. The ISOR states that the total fee amount has been reduced slightly based on updated economic models.

A request to the agency was submitted on October 8, 2020, requesting a copy of the updated Economic and Fiscal Impact Analysis for the revised CAP regulations. We respectfully request that the agency make the revised EFIA available to the public for review and comment during the rulemaking.

We appreciate the agency reducing the fee for petitions and amendments. There is significant interest in this program on the part of small legacy farmers. Most of these farmers are self-financed, independent business owners and land owners living on rural homesteads pursuing cottage industry entrepreneurship. These stakeholders have invested considerable resources in entering the regulated market, particularly for environmental, land use, and building code compliance. State environmental regulations require that most of these farmers conduct extensive biological assessments and mitigate environmental impacts, including legacy impacts from previous owners and activities, property wide. These small farmers are still investing in their new businesses, and many are still a few years away from being profitable. This year nearly every legacy cannabis farming region in California has been impacted by wildfires, and all of us are facing the challenges of global recession.

The other side of the picture is that many of these small farms will recoup capital expenditures moving towards profitability within a few years, in particular the homestead based businesses operating with smaller overhead. Cannabis is an essential product with an essential business supply chain that anchors the industry as a sustainable revenue source, particularly for California's rural communities, during this pandemic stricken economy.

We would like to reiterate our previous recommendations to further break up the fee structures and diversify revenue generating opportunities for CAP.

We recommend that fee sharing occur with the users of the appellation. This can be accomplished by charging those users when they submit their Notice of Use.

Use of the proposed official appellation seal or seals also could be subject to a fee to help fund the CAP and support active enforcement against counterfeit products.

We are concerned about how the petition fees are assessed. As proposed, the first fee is due upon submission of the petition. The second fee is due just before the appellation is approved.

We recommend that the second fee be paid after the petition is deemed complete. This will ensure that the agency has the funds to review and process the petition.

We recommend the development of a tiered fee schedule that addresses the full spectrum of possible amendments. We propose that fees to amend any appellation standard, practice, or cultivar should be low in order to support regional innovation and the development of CAP.

We recommend that the fiscal components of this proposal be further assessed with an eye toward the long-term viability and success of the CAP.

We urge the agency to expand the funding for CAP and prioritize budgeting for an exemplary team of accredited experts to serve on the Petition Review Panel.

Petition Review & Approval Process

Sec. 9200(f) was added to address the break up of payments in relation to the petition approval and final determination notifications:

If the department intends to approve the petition, the department shall send a notice to the petitioner requesting payment of the petition approval fee. The petitioner shall pay the petition approval fee before the notice of final decision is issued pursuant to section 9202. The petitioner shall have 120 days from the date of the request to submit the payment to the department. If the petition approval fee is not submitted in full, the department shall notify the petitioner by e-mail that the petition is abandoned and shall no longer be considered by the department.

The petition review, approval, and final determination process is unclear and should be clarified. Of particular concern to us is the lack of clarity regarding whether the petition review and approval process is a formal rulemaking, subject to the Administrative Procedures Act (APA), and the potential impacts that will have on public notifications, public comment, and the publication of the department's reasoning and findings. These unanswered questions are fundamental to understanding the mechanics and evaluating the integrity of the proposed petition review and determination process.

We believe that appellation petition processing constitutes rulemaking that should be governed by the APA. The department's decisions are rights that run with the land, and the department's decisions will establish precedents that affect cannabis cultivators and others in the cannabis business statewide.

Further, appellations are legal intellectual property rights that interplay with and impact other IP, including trademarks, certification and collective marks, patents and cultivar registrations. Due to the nascent stage of the regulated cannabis market, these considerations carry extra bearing on the development of California's

fledgling cannabis brands and their business and marketing plans. These considerations also impact regional marketing and development efforts. The petitioning for and approval of any given appellation has the potential to significantly impact any given licensed cannabis business in California, regardless of license type or sector.

We ask that a detailed petition review process, along the lines suggested below, be included in the regulations:

- 1. The department shall have up to six months to respond to a submitted petition or a resubmitted petition.***
- 2. Following receipt of the second fee payment, the department reviews the substance of the petition, including input from the Petition Review Panel.***
- 3. After that review is done and the department is ready to act, it should announce its intended decision and invite public comments for a minimum of 45 days and up to 90 days, at the discretion of the department, with extensions granted for good cause. All comments should be made available to members of the public.***
- 4. Specific notice should be sent to every licensee in the state. We support the proposal in Sec. 9201(b): "A notice of proposed action on an appellation of origin shall include weblinks to: (1) The completed petition; (2) A map of the area described by the petition; and (3) the standard, practice, and cultivar requirements identified in the petition."***
- 5. The department shall have up to 12 months to issue a final decision on the petition, including a statement of reasons, following the end of the public comment period.***

3. Geographic Trademark Sunset

We greatly appreciate the agency's revisions which protect against the infringement of an appellation of origin by the misdescriptive use of a trademark with the same or similar appellation name. This is essential to preventing consumer confusion.

Given the common use of geographic trademarks for cannabis brands, particularly those that include the names of regions renowned for cannabis production, we urge CDFA to notify all cannabis licensees in California of notices of proposed action and final determinations on petitions, both those to establish an appellation and to amend an appellation.

4. Notice of Use

We appreciate the revision to Sec. 8212.1 providing that: "A Notice of Use may include more than one appellation of origin only if all license numbers listed in the Notice of Use begin use of all of the listed appellations of origin on the specified date."

We request clarification that an appellation of origin designation can be used by a cultivation, nursery, or processing licensee by filing a Notice of Use.

We request clarification that an appellation of origin designation for cannabis and cannabis products can be used by manufacturing or distribution licensees packaging or labeling qualifying products by filing a Notice of Use.

We would like to reiterate our recommendation to charge a modest fee for notice of use registration.

5. Practices

In our previous comments we recommended the adoption of a more expansive definition of practice that includes a wider range of activities, including without limitation cultivation, land management, and business practices. Defining practices more broadly provides the opportunity to protect and promote cultural values, development approaches, land management practices, as well as practices that directly relate to cultivation methods.

We appreciate the revision to Sec. 9000(d) expanding the definition of a practice to include cultivation or method of conducting commercial cannabis activity. Authorizing appellation producers to control social and business practices are central to codifying collective cultural values, and targeting the intended impact of these practices toward local economic development and market development goals.

Many sustainability practices include land management practices, something that CAP, as a standards based marketing program, can incentivise and promote. Many legacy farmers already practice regenerative farming and other sustainability practices that incorporate land management practices.

We reiterate our request to additionally expand the definition of a practice to include “land management,” which may not easily be defined as “cultivation” or a method of conducting commercial cannabis activity.

Sec. 9107(d)(1) allows for a prohibited cultivar to satisfy this requirement, which we support. However, we recommend that the regulations clarify that a prohibited practice by itself does not satisfy this requirement; a list of both mandatory and prohibited practices, however, would qualify.

6. Certifiers

We appreciate the revision clarifying Sec. 9107(b)(2) which added the phrase “according to the certification owner” to clarify the appropriate method of determining whether a certifier is in good standing pursuant to federal certification mark regulation.

Additionally, we recommend that a certifier in good standing should be allowed to substantiate practices and cultivars, in addition to standards.

7. Labeling

There have been a number of revisions to Sec. 8212. Advertising, Marketing, Packaging, and Labeling of Cannabis and Nonmanufactured Cannabis Products to align with Senate Bill 67.

It is imperative that additional provisions stipulating detailed labeling requirements are in place before any appellation of origin is approved. It is even more urgent that provisions for County and City of Origin be promulgated given that those designations are legally applicable at present.

We reiterate our proposal for the adoption of an official state-designed logo or seal for county, city and appellation of origin designated products, akin to the OCal seal which has been proposed by CDFA.

We recommend that in addition to the official seal(s), labeling requirements should stipulate that the appellation name is prominently and legibly displayed on the label, along with the county of origin if applicable.

Clarifications Pursuant to SB 67

8. Pursuant to SB 67

Senate Bill 67 has amended Business & Professions Code 26063(c) to read:

An appellation of origin shall not be approved unless it requires the practice of planting in the ground in the canopy area and excludes the practices of using structures, including a greenhouse, hoop house, glasshouse, conservatory, hothouse, and any similar structure, and any artificial light in the canopy area.

We recommend that this required practice be added as a new provision under Sec. 9107. Standard, Practice, and Cultivar Requirements. Additionally, we recommend that CDFA require that appellation petitioners certify, subject to a CDFA inspection, that they meet the requirement.

Cannabis cultivation almost always requires the practice of trellising the plant. We recommend adding language in the CAP regulations clarifying that the practice of trellising is not included in the prohibition of using structures as described in BPC 26063(c).

Outstanding Comments Not Yet Addressed by CDFA

The following topics and comments were not addressed by the agency in the revised proposed regulations or the ISOR. As stated in the introduction, we expected an explanation, as required by Government Code

11346.9, of why you rejected these comments. These comments address critical issues that we believe will impact the integrity and success of CAP. They are presented in order of priority to our stakeholders.

9. Consensus

Our initial comments put forward a suite of recommendations regarding consensus. [Consensus strikes at the heart of developing and sustaining an appellation](#). The consensus aspects of the process are especially critical for cannabis, a California agricultural activity that involves a Federally controlled substance, newly legalized and regulated, and subject to much misunderstanding and prejudice within many local communities, even those regions that provide for regulated production. It will take many years for the culture of prohibition to dissolve. This inherent friction is most frequently expressed through land use, development trajectories and regional identity conflicts, all of which are core tenets of appellations development and success.

In order for appellation groups to bring forward sound community supported petitions and in order to mitigate conflict, and thus enhance efficiency during the public comment and petition review process, we strongly urge you to please adopt our consensus recommendations below.

CDFA's professed goal of "greater consensus-building in a proposed cannabis appellation of origin" seeks "to avoid the establishment of appellations with overly specific or burdensome requirements in favor of any individual cultivator" (Initial Statement of Reasons, page 15) or weak requirements that make the appellation meaningless. We share this goal of consensus-building but believe that the regulations, as presently written, will not achieve it because only three licensed cultivators are required to submit a petition (Sec. 9000(b)), and those three petitioners can propose whatever standards, practices, and cultivars they wish without a requirement to involve the broader community.

We believe that consensus is better achieved by requiring a much higher degree of cultivator support **before** an appellation petition is submitted. This will avoid any rush-to-market mentality that could result in chaos after the CAP regulations take effect. Such a requirement also would substantially simplify the appellation review process for CDFA staff by diminishing the potential for contentious public comments. Finally, a requirement for community consensus would avert prospective conflict within interdependent rural cannabis-producing communities.

For a petition to be considered complete, the support of a majority of the qualifying cultivator licensees within the proposed appellation should be required on the appellation name, geographic boundaries, standards, practices, and cultivars.

To guard against unfair vote stacking through licensed affiliates and subsidiaries, to protect small independent businesses, and to ensure true consensus, an individual or business entity that owns or holds a financial interest in multiple licenses, including licenses that are commonly owned, defined as at least 50% ownership by the same parties directly or indirectly, should be entitled to only one vote.

To further clarify, it is our recommendation that all outdoor licensees within the proposed boundaries be entitled to vote, regardless of cultivation practices.

Additionally, we recommend that groups petitioning for nested appellations or amendments to an established appellation be required to demonstrate majority support for the proposed nested appellation or amendment by the licensed outdoor cultivators within the appellation boundaries.

10. Site Inspections

After an appellation is established, we recommend active enforcement through regular or spot CDFA audits of the cultivators and users of the appellation designation (these might be conducted by CDFA's Market Enforcement Branch, with separate funding) and/or the assignment of enforcement responsibility to a third-party certifier.

11. Fines

Given that CAP is a new program, globally the first of its kind for cannabis, we recommend that a first time offense be classified as "Moderate" (Fine range: \$501 to \$1,000 per violation) and that subsequent violations be classified as "Serious" (Fine range: \$1,001 to \$5,000 per violation), subject to license suspension or revocation.

12. Partially Overlapping Appellations

We propose that no partially overlapping appellations be allowed because they are inherently confusing to consumers, will make it substantially more difficult to reach community consensus on appellation petitions, and will dilute the distinction of appellations rather than strengthening them.

13. Nested Appellations

We support nested appellations (that is, an appellation that is wholly inside one or more larger appellations), but only with the requirement for consensus mentioned above, with only the qualifying licensees contained within the proposed nested appellation voting.

We recommend that a single petition be allowed to propose multiple appellations that are nested within one another, with only one filing fee required. Petitions for nested appellations should examine and explain how the appellations interrelate, which will allow for an easier review process for the agency and the Petition Review Panel. Additionally, this will encourage broader consensus-based regional appellation development.

14. Public Access to Petitions

We recommend that CDFA establish and manage a web-based platform that serves as a searchable database for petitions under review as well as those approved and that can function as a consumer facing marketing tool for the CAP and for all established appellations of origin.

In closing, we ask for your support in ensuring that California's cannabis appellations are developed through consensus driven process and premised upon defensible causal link(s) between the unique expression of the cannabis and the terroir in which it was produced, in keeping with the intent of Senate Bill 67.

Origins Council and our partner organizations thank you for this opportunity to offer these comments. We would be pleased to provide any further clarifying information or explanations that would be helpful.

Sincerely,



Genine Coleman
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Joanna Cedar
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Sonoma County Growers Alliance



Oliver Bates
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