



Origins Council Public Comment for Cannabis Advisory Committee CCTT Subcommittee

Date: October 8, 2024

On behalf of Origins Council, representing 800 small and independent cannabis businesses in rural legacy producing counties throughout California, we appreciate the opportunity to comment on the October 8 Cannabis Advisory Committee subcommittee meeting on track and trace.

We have not had an opportunity to develop collective comments on proposed CCTT regulations which were made publicly available late last week. However, we are disappointed that these regulations do not include any proposed changes to implement SB 622, legislation signed by Governor Newsom over a year ago to enable the batch tagging of mature cannabis plants in METRC.

As discussed in our comments submitted for the last Cannabis Advisory Committee meeting, the current requirement to physically tag each individual plant in METRC requires tremendous effort on the part of the cultivator, with no clear corresponding regulatory benefit. For a half-acre farm, we estimate it typically requires a crew of five people 3-4 days to tag all plants within a licensed cultivation area. Tagging each plant also generates large amounts of plastic waste. We estimate that a 10,000 square foot ML1 license utilizing light deprivation will generate about 30 pounds of plastic tag waste per year.

If the DCC intends to promulgate regulations on CCTT, we believe it is critical that batch tagging is addressed within these regulations. We encourage the subcommittee to recommend these changes, and for the DCC to adopt them at the earliest possible opportunity.

Thank you for your consideration,



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