

HARVEST

Tuesday, September 28, 2021

Monet Vela
Office of Environmental Health Hazard Assessment
1001 I Street, 23rd Floor
PO Box 4010
Sacramento, CA 95812

RE: Proposed Amendments to Clear and Reasonable Warning Under Prop. 65

Dear Ms. Vela:

Thank you for this opportunity to voice our concern and respectfully oppose the amendments to Article 6, Clear and Reasonable warnings under Proposition 65 by the California Office of Environmental Health Hazard Assessment (OEHHA). Harvest Health & Rec. (Harvest) applauds OEHHA's mission of protecting Californians, but these amendments won't provide more safety and potentially will lead to an increase in the illicit cannabis market within the state.

Current California regulations, when it comes safety and consumer products, are some of the strictest in the nation. Legal cannabis operators in the state are already required to: use packaging and labeling that clearly includes "warning" in bold and capital letters, statements of potential health risks, and information on the product itself including compounds, any containments, cannabinoid content, and expiration dates. Patients and recreational users have the right to know the potential risks related to using cannabis; as well as, what is in their product. The current rules and regulations on packaging already exceed the minimum requirements of that right and these new requirements would only place a financial burden on operators without providing any extra patient, customer safety.

An additional concern we have regarding the amendments, placing additional obligations on legal cannabis producers/retailers isn't going to encourage illicit providers to become compliant. This is a huge area of concern for the cannabis community in California. As our industry continues to pushback and fight against illicit operators, we would much rather work with OEHHA to ensure rules already in place are followed and enforced than have new rules come out that could lead to additional illicit operators, or worse have compliant operators become non-compliant.

Thank you for the opportunity to provide comments on these proposed changes to current regulations. Harvest welcomes the opportunity to be a resource and partner to OEHHA.

Sincerely,

Lauren Niehaus
Director of Government Relations
Harvest Health & Recreation Inc.