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STATE OF VERMONT

Legislative Committee on Administrative Rules (LCAR)

MEMORANDUM

TO: Representative Sarah Copeland Hanzas, Chair, House Committee on Government Operations
Representative Ann Pugh, Chair, House Committee on Human Services
Representative Maxine Grad, Chair, House Committee on Judiciary
Senator Jeanette K. White, Chair, Senate Committee on Government Operations
Senator Virginia "Ginny" Lyons, Chair, Senate Committee on Health and Welfare
Senator Dick Sears, Jr., Chair, Senate Committee on Judiciary

FROM: Legislative Committee on Administrative Rules

DATE: March 31, 2022

SUBJECT: Rule 2: Regulation of Cannabis Establishments (Cannabis Control Board)

The Legislative Committee on Administrative Rules (LCAR) reviewed the Cannabis Control Board's [Rule 2: Regulation of Cannabis Establishments \(Cannabis Control Board\)](#) (Rule 2) at a scheduled meeting, for which there was not quorum, on February 24, 2022, and at LCAR's March 10, 2022, meeting. LCAR approved Rule 2, with proposed modifications from the Cannabis Control Board, including some on Sec. 2.2.10, which regulates the contents of the warning label, per the review of the Department of Health. *See* [Memorandum from D. Scherr, Mar. 8, 2022](#).

LCAR and its members also received written testimony on the contents of the warning label and Sec. 2.2.10, *see* [Letter from D. Silberman, Feb. 18, 2022](#), and [Letter from L. Zamvil et al., Mar. 4, 2022](#), and heard oral testimony from David Silberman on February 24, 2022, and Dr. Catherine Antley on March 10, 2022. The Cannabis Control Board also received extensive public comments as part of the rulemaking process, including comments on Sec. 2.2.10 and the contents of the cannabis warning label, and those are available in the rule filing for Rule 2. *See* [LCAR Filing 21-P39](#). Written and oral testimony also addressed recent statutory and regulatory changes from other states, including Colorado.

Accordingly, LCAR requests that the House Committee on Government Operations, House Committee on Human Services, House Committee on Judiciary, Senate Committee on Government Operations, Senate Committee on Health and Welfare, and Senate Committee on Judiciary review, during the 2022 or 2023 legislative session, Sec. 2.2.10, the contents of cannabis warning labels and packaging requirements in other states, and any recent statutory changes or regulatory changes, or both, from other states related to the health concerns around the use of cannabis.