

October 2, 2023

General Assembly  
Legislative Committee on Administrative Rules  
State House Room 10  
115 State Street  
Montpelier, Vermont 05633-5301

Re: 23P011--Rule 1: Licensing of Cannabis Establishments  
23P012--Rule 2: Regulation of Cannabis Establishments

Chair Squirrell and Members:

The proposed rule filings captioned above are scheduled for LCAR review on October 5. Based on discussion with Legislative Counsel, we have identified technical and typographical issues bearing correction. Attached, please find revised clean and annotated rule text for each. The following corrections have been made:

- Strikethrough text inadvertently included in what should have been the clean copy of Rule 1, at section 1.4.5(b), has been removed from the clean text as originally intended. The subsections that follow (b) have been re-lettered accordingly.
- A list following at Rule 2.1.3(a) included a gratuitous conjunction, *or*, in addition to the terminal conjunction. It has been removed.
- The word *be* was omitted from Rule 2.2.2(d). The text has been corrected.
- Rule 2.2.4(h) has been amended to describe the scientific term *water activity* by its conventional abbreviation (a w). The term is also de-capitalized for consistency.
- An unnecessary and confusing dangling sentence has been removed from the proposed amendments to Rule 2.2.4.
- References to *worker's compensation* have been corrected to *workers' compensation*.

If the rules should meet with the Committee's approval, the agency would ask LCAR's permission to further amend the final rule filing to remove all instances of "but not limited to" following the terms "include," "includes," and "including," so as to bring our text into conformity with 1 V.S.A. § 145.

Finally, I note that the re-filed annotated text treats all section numbers as though each appeared twice, with one stricken. This is an undesired idiosyncrasy of the electronic document comparison tool that I have been unable so far to overcome. The annotated text appears otherwise to accurately reflect substantive changes.

Please do not hesitate to call if you have questions.

Very truly yours,



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