



## County Health Executives Association of California (CHEAC)

### Department of Food and Agriculture Response to CHEAC Comments

#### Proposed Text of Regulations California Code of Regulations Title 3. Food and Agriculture Division 8. Cannabis Cultivation

#### General Recommendation

Recommendation: A new equity applicant category should be created to ensure that majority ownership applications by persons in communities with high rates of cannabis related incarceration and that have experienced other social ill effects from the unequal enforcement of cannabis possession laws have prioritized application status to benefit from the legalization of cannabis.

**CDFA Response:** CDFA rejects this comment. The Department does not have the statutory authority to implement a program as suggested by the comment.

#### § 8109. Applicant Track-and-Trace Training Requirement

Recommendation: A designated responsible party, or a designated agent should be reinstated to this section. This section reads that only the owner may act as the track-and-trace system account manager.

*(a) For the purpose of this section, the applicant shall designate **a responsible party or designated agent** to be the licensee's track-and-trace system account manager pursuant to section 8402 (c) of this chapter. The designated account manager shall register for track-and-trace system training providing by the department within ten (10) calendar days of receiving notice from the department that its application for licensure has been received and is complete.*

**CDFA Response:** CDFA agrees with this comment and has made applicable revisions to section 8402, subdivision (c) accordingly. The proposed regulations now read: "Pursuant to section 8109 of this chapter, each licensee shall identify an owner in the licensee's organization to be the licensee's track-and-trace system account manager."