



October 6, 2021

Ms. Monet Vela  
Office of Environmental Health Hazard Assessment  
1001 I Street  
P. O. Box 4010  
Sacramento, CA 95812-4010

Re: Comments on Proposed Rulemaking (Marijuana) Smoke Delta-9 -THC  
California Code of Regulations Title 27 Article 6

Dear Ms. Vela:

While our organization appreciates the fact that new revisions to the proposed rules would give cannabis businesses a year to comply this does nothing to:

- Address the ongoing expense borne by businesses when multiple, specialized warnings require that all cannabis packaging be redesigned.
- Mitigate the burden placed on small businesses by the proposed revisions which will be particularly impactful on social equity businesses.
- Correct the overlapping of your new warnings with warnings already required on cannabis packaging.
- Correct deficiencies in the scientific record you relied upon relating to pregnancy.
- Acknowledge that allocation agreements are unworkable for the Cannabis Industry.

Our organization respectfully requests that those involved in the rulemaking process, address the items above, and engage further with stakeholders before imposing expensive and unnecessary changes on an industry which must contend with an illicit market three times larger than the legal one, while struggling to survive during a global pandemic.

Founded over half-a-decade ago, the Southern California Coalition is the Southland's largest trade association for cannabis stakeholders. The organization collaborates closely with legislators at the local, state, and federal level to ensure cannabis policies are inclusive and fair.

I can be reached at (710) 654-1930 or [adam@southerncaliforniacoalition.com](mailto:adam@southerncaliforniacoalition.com) if you have any questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Adam Spiker", is written over the printed name.

Adam Spiker  
Executive Director  
The Southern California Coalition