

17.38 has language that restricts certain license types to transfer products to certain other license types. This is a burden that restricts businesses from deciding what they can do with certain products. The highlighted language should be removed and be replaced to allow transfers between any license type. Below is the example of the language for a retail store, but all license types should be updated.

Sec. 17.38.070. Lawful operation of marijuana-related facilities.

(a) Notwithstanding any other provision of law, the following acts, when performed by a retail marijuana store with a current, valid registration, or a person 21 years of age or older who is acting in the person's capacity as an owner, employee, or agent of a retail marijuana store, are lawful and shall not be an offense under Alaska law or be a basis for seizure or forfeiture of assets under Alaska law:

(1) possessing, displaying, storing, or transporting marijuana or marijuana products, except that marijuana and marijuana products may not be displayed in a manner that is visible to the general public from a public right-of-way;

(2) delivering or transferring marijuana or marijuana products to a marijuana testing facility;

(3) receiving marijuana or marijuana products from a marijuana testing facility;

(4) purchasing marijuana from a marijuana cultivation facility;

(5) purchasing marijuana or marijuana products from a marijuana product manufacturing facility; and

Remove the above language and replace with: (2) purchase, deliver or transfer to another licensed marijuana facility

The other issue I would like to see removed is the reference to annual renewal, I think this is the only place it needs to be removed, then the board could determine the renewal periods.

Sec. 17.38.200. Marijuana establishment registrations

(d) Within 45 to 90 days after receiving an application or renewal application, the board

shall issue **an annual** registration to the applicant unless the board finds the applicant is not in compliance with regulations enacted pursuant to AS 17.38.190 or the board is notified by the relevant local government that the applicant is not in compliance with ordinances and regulations made pursuant to AS 17.38.210 and in effect at the time of application.