



JOE LOMBARDO
Governor

CANNABIS COMPLIANCE BOARD STATE OF NEVADA

ccb.nv.gov
CARSON CITY OFFICE
3850 Arrowhead Drive, Suite 100
Carson City, Nevada 89706
Main Line: (775) 687-6299

LAS VEGAS OFFICE
700 East Warm Springs Road, Suite 100
Las Vegas, Nevada 89119

MICHAEL MILES
Executive Director

STEVE GILBERT
Deputy Director

MAJ. GEN. ONDRA BERRY, (RET.)
Chair

LEGISLATIVE REVIEW OF ADOPTED REGULATIONS AS REQUIRED BY NRS 233B.066

INFORMATIONAL STATEMENT LCB File No. R152-24

The following statement is submitted for adopted amendments to Nevada Administrative Code (NAC) Chapter 678A, 678B and 678D.

1. A clear and concise explanation of the need for the adopted regulation.

The Cannabis Compliance Board's update to this regulation is necessary to update and incorporate changes from the 2023 Legislative Session including clarifying definitions, establish new category violations, redefine and update existing category violations, and address issues regarding disciplinary actions, exemptions and collection of fees. Also included are changes to classify and improve packaging and advertising, possession and purchase limits, annual agent card costs, and wholesale cannabis distribution. The proposed revisions modify, clarify and update existing legal requirements to ensure regulatory compliance while strengthening protections for public health and safety.

2. Description of how public comment was solicited, a summary of public response, and an explanation of how other interested persons may obtain a copy of the summary.

The Cannabis Compliance Board sent copies of the proposed regulations and notices of workshop and intent to act upon the regulations by electronic mail (ListServ) to the Board's general interested parties list, Legislative Counsel Bureau Regulation Notices, and Public Notices on Notice.nv.gov as follows:

<u>Date of Notice</u>	<u>Workshop or Hearing</u>	<u>Date of Meeting</u>	<u># Persons Notified</u>	<u># Persons Opened</u>
03/13/2024	Workshop	03/28/24	9699	3764
04/15/2024	Workshop	04/30/24	9799	3610
04/29/2024	Workshop	05/14/24	9850	3653
05/16/2024	Workshop	05/31/24	9953	3658
10/17/2025 and 11/14/2025	Adoption Hearing	11/20/25	12306	5007
			12229	4410
06/12/2026	Adoption Hearing	06/18/26	12561	1825

Printed notices were posted at the following locations:

Nevada State Library
100 Stewart St.
Carson City, NV 89701

Legislative Building
401 S. Carson Street
Carson City, NV 89701

One Nevada
1 State of Nevada Way
Las Vegas, NV 89119

Cannabis Compliance Board
700 E. Warm Springs Rd. Suite 100
Las Vegas, NV 89119

Cannabis Compliance Board
3850 Arrowhead Dr., Suite 100
Carson City, NV 89706

Access to the proposed regulations, minutes, video recordings of the workshops and Adoption Hearings may be obtained on the Cannabis Compliance Board website at www.ccb.nv.gov or by emailing ccblicensing@ccb.nv.gov. Persons interested in the summary of public response regarding R152-24 may email ccblicensing@ccb.nv.gov for a copy of the following summary.

Summary of public responses and discussion:

Written comments were submitted to CCB prior to each workshop and are summarized as follows:

- **March 28, 2024, Workshop (NCCR 12)**
Public comments primarily focused on proposed packaging, labeling, and advertising amendments. Commenters generally supported providing consumers with accurate product information while expressing concerns regarding implementation costs, operational impact, and potential unintended consequences of new labeling requirements. Several commenters requested flexibility in allowing existing packaging inventories to be exhausted, minimizing unnecessary waste, and permitting disclosures through alternative methods where appropriate. Consumer advocates emphasized transparency regarding post-harvest treatment of cannabis products and recommended that any remediation or microbial treatment be clearly disclosed on product labels to allow informed purchasing decisions.
- **April 30, 2024, Workshop (NCCR 5, 7, 11)**
Public comments primarily focused on proposed laboratory testing, sampling, and operational requirements. Differing views were expressed on increasing cannabis lot sizes, balancing potential cost savings and operational efficiencies against concerns regarding sampling accuracy, public health, and impacts on smaller cultivators. Requests were made for greater flexibility in regulatory language, clearer guidance, and the continued use of established laboratory practices to avoid unintended compliance burdens. Additional comments addressed testing requirements, consumer safety, remediation, Certificates of

Analysis, and payment protections for laboratories, with an overall emphasis on maintaining public health while minimizing unnecessary operational impacts.

- **May 14, 2024, Workshop (NCCR 1, 4, and 6)**

Comments largely supported efforts to align regulations with statutory changes enacted during the 2023 Legislative Session while recommending additional clarification throughout the proposed regulations. Stakeholders requested more precise definitions, greater consistency in regulatory terminology, clearer standards for enforcement, and guidance regarding disciplinary categories, inventory variances, reporting requirements, and operational expectations. Several comments also encouraged the Board to reduce unnecessary administrative burden while maintaining public health and safety protections.

- **May 31, 2024, Workshop (NCCR 12)**

Comments reflected differing perspectives regarding product labeling and post-harvest treatment disclosures. Patient advocates generally supported mandatory labeling of treated cannabis products to promote consumer awareness and informed decision-making, while industry representatives expressed concerns regarding implementation costs, packaging waste, operational flexibility, and the potential impact of disclosure language on consumer perception. Additional recommendations included allowing electronic or supplemental disclosures, reducing unnecessary point-of-sale labeling requirements, and providing adequate implementation periods for packaging changes.

Overall Themes Across All 2024 Workshops

Across all workshop comment submissions, several recurring themes emerged. Commenters consistently supported regulations that promote public health, safety, and consumer transparency while requesting clear regulatory language, practical implementation timelines, and flexibility that minimizes unnecessary economic and administrative burdens. Many stakeholders also emphasized the importance of consistent definitions, transparent communication, and regulations that can be implemented efficiently without compromising consumer protections or regulatory oversight.

Summary of workshop discussions

Public comments were given, and discussion was held at each workshop, and is summarized as follows:

- **March 28, 2024, Workshop**

Public comments primarily focused on proposed amendments related to packaging, labeling, advertising, and operational requirements. Stakeholders expressed concerns regarding implementation costs, packaging waste, and the potential burden associated with new labeling requirements. Additional comments emphasized the importance of consumer transparency, particularly regarding product treatment disclosures, while recommending reasonable implementation timelines and flexibility to reduce unnecessary impacts on licensees.

- **May 14, 2024, Workshop**

Public comments generally supported efforts to update regulations to reflect statutory changes while requesting greater clarity and consistency throughout the proposed language. Stakeholders expressed concerns regarding regulatory ambiguity, administrative burden, reporting requirements, disciplinary provisions, and operational compliance. Several commenters recommended refining definitions, improving consistency across regulations, and providing additional guidance to facilitate compliance.

- **May 31, 2024, Workshop**

Public comments reflected differing viewpoints regarding proposed labeling requirements for treated cannabis products. Some commenters supported enhanced disclosure to promote consumer awareness and informed purchasing decisions, while others expressed concerns regarding implementation costs, packaging impacts, and operational challenges. Additional comments recommended allowing flexible methods of disclosure, reducing duplicative requirements, and providing adequate time for regulated businesses to implement changes.

Overall Summary

Across all 2024 public workshops, recurring themes included requests for clear and consistent regulatory language, practical implementation timelines, and reduced administrative burden while maintaining strong public health, safety, and consumer protection standards. Stakeholders generally supported modernizing regulations but encouraged the adoption of flexible, clearly defined requirements that promote compliance, operational efficiency, and regulatory transparency.

Summary of public comments at adoption hearings:

Additional public comments were received at each adoption hearing, and are summarized as follows:

- **November 20, 2025, Adoption Hearing Summary:**

Public comment primarily focused on proposed amendments affecting independent testing laboratory regulations, sample collection requirements, labeling provisions, and implementation timelines. Commenters expressed concern that several proposed changes differed from language previously presented during the public workshop process and may conflict with legislative intent. Stakeholders requested additional clarification regarding laboratory testing standards, certificates of analysis, sample size requirements, software and delivery platform language, labeling requirements, and implementation schedules. Several commenters recommended postponing adoption of portions of the regulations to allow for additional stakeholder review and workshops before final action.

Following public comment and Board discussion, members acknowledged that several provisions of the proposed laboratory regulations warranted additional review. The Board voted to postpone consideration of NCCR 11, Sections 61 through 73, for up to 60 days to allow further evaluation and stakeholder input, while approving the remaining regulatory amendments presented for adoption.

- **June 18, 2026, Adoption Hearing Summary:**

Public comment generally supported the extensive work completed to update the proposed regulations while requesting clarification and refinement of several provisions before implementation. Stakeholders expressed concerns regarding the incorporation of scientific standards by reference, potential conflicts between proposed regulations and recently enacted legislation, sample size requirements for laboratory testing, branded merchandise provisions, post-harvest treatment approvals, and the potential costs associated with increased testing requirements. Several commenters emphasized the importance of clear regulatory language, practical implementation, and ensuring that licensees are not subject to conflicting statutory and regulatory requirements.

Board discussion focused primarily on the proposed increase in laboratory sample size from ten grams to twenty grams and whether amendments should be made prior to adoption. Members considered the scientific justification for the increase, the potential financial impact on licensees, and whether modifying the proposal at that stage of the regulatory process could delay adoption.

Following discussion, the Board determined that amending the proposal could significantly delay the rulemaking process and voted to adopt the regulations as presented without modification.

3. The number of persons who:

- (a) Attended each hearing:** November 20, 2025 – 23; June 18, 2026 - 22
- (b) Testified at each hearing:** November 20, 2025 – 4; June 18, 2026 - 7
- (c) Submitted to the agency written comments:**
 - November 20, 2025: Eight attendees submitted written comments.
 - June 18, 2026: Two attendees submitted written comments.

4. A list of names and contact information, including telephone number, business address, business telephone number, electronic mail address, and name of entity or organization represented, for each person identified above in #3, as provided to the agency.

The list of contact information for each person who attended, testified, or submitted written comment as provided to the agency is attached as Exhibit A.

5. A description of how comment was solicited from affected businesses, a summary of their response and an explanation of how other interested persons may obtain a copy of the summary.

The Cannabis Compliance Board sent copies of the proposed regulations along with an electronic Small Business Impact Survey via the CCB website as well as ListServ notices as follows:

<u>Date of Notice</u>	<u>Due Date for Survey</u>	<u>Date of Workshop</u>	<u># Persons Notified</u>	<u># Persons Opened</u>
02/29/2024	03/10/2024	03/28/2024	9701	3941
03/22/2024	04/07/2024	04/30/2024	9732	3857
04/11/2024	04/21/2024	05/14/2024	9806	3780
05/16/2024	05/23/2024	05/31/2024	9953	3754

The summary of comment received is attached as R152-24B. Persons interested in obtaining a summary of the Small Business Impact Statements may email ccblicensing@ccb.nv.gov and include in the subject line “SBIS Summary 2024”.

6. If the regulation was adopted without changing any part of the proposed regulation, a summary of the reasons for adopting the regulation without change.

File R152-24 RP1 was adopted as is by the CCB Board on June 18, 2026, and the file included changes discussed at the workshops.

7. The estimated economic effect of the regulation on the business which it is to regulate and on the public. These must be stated separately, and each case must include:

- (a) Both adverse and beneficial effects; and**
- (b) Both immediate and long-term effects.**

(a) Both adverse and beneficial effects on the cannabis industry:

Adverse effects: The Agency estimates that the proposed regulations will not have an adverse economic effect on the cannabis industry or the public. The revisions update existing regulations and reduce certain financial and regulatory requirements, resulting in less burdensome compliance obligations. These changes are not expected to impose substantial costs or operational burdens on the cannabis industry. Additionally, most, if not all, licensed cannabis establishments in Nevada qualify as small businesses; therefore, any economic impacts are attributable to market competition rather than the size of the business.

Beneficial effects: The Agency estimates that the proposed regulations will provide beneficial economic effects on the cannabis industry by streamlining labeling requirements, reducing replacement agent card fees, and clarifying testing requirements, thereby lowering compliance costs and increasing regulatory certainty. The revised enforcement provisions reduce civil penalties and investigation costs, establish a progressive disciplinary framework, and strengthen efforts to combat the illicit market, supporting fair competition and the continued growth of Nevada's legal cannabis industry. Similarly, clearer testing and labeling requirements and disincentives to the illicit market bolster public benefit by increasing regulatory certainty and decreasing access to unsafe products.

(b) Both immediate and long-term effects

Immediate effects: The proposed regulations are expected to have no adverse economic effect on small businesses and are anticipated to provide overall economic and regulatory benefits. In the immediate term, regulated cannabis businesses will benefit from streamlined labeling requirements, reduced replacement cannabis agent card fees, clarified testing standards, and reduced compliance and enforcement costs. The public is expected to benefit from clearer regulatory standards, improved product quality and safety, and a regulatory framework that promotes compliance and consumer confidence.

Long-term effects: Over the long term, the regulations are expected to improve regulatory consistency, promote fair competition, enhance confidence in testing and product safety, and support a stable, compliant legal cannabis market. The public is expected to benefit from clearer regulatory standards, improved product quality and safety, and a regulatory framework that promotes compliance and consumer confidence.

8. The estimated cost to the agency for enforcement of the proposed regulation:

The proposed regulations present no significant foreseeable or anticipated cost or decrease in costs to the Cannabis Compliance Board.

9. A description of any regulations of other State or governmental agencies which the proposed regulation overlaps or duplicates and a statement explaining why the duplication or overlap is necessary. If the regulation overlaps or duplicates a federal regulation, the name of the regulating federal agency.

The proposed regulation does not overlap or duplicate any regulation of other state or local governmental entities.

10. If the regulation includes provisions that are more stringent than a federal regulation that regulates the same activity, a summary of such provisions.

There are no federal regulations that apply.

11. If the regulation provides a new fee or increases an existing fee, the total annual amount the agency expects to collect and the manner in which the money will be used.

The proposed regulations do not provide a new fee or increase existing fees.

EXHIBIT A

A list of names and contact information, including telephone number, business address, business telephone number, electronic mail address, and name of entity or organization represented, for each person identified above in #3, as provided to the agency.

Adoption Hearing November 20, 2025

Cannabis Compliance Board Deputy Director Michael Miles
Kara Cronkhite, Chief of Health and Safety, Cannabis Compliance Board
Senior Deputy Attorney General Allison Herr represented the Cannabis Compliance Board

1. **Layke Martin** on behalf of the Nevada Cannabis Association
702-483-7255
2. **Amanda Connor** of Connor & Connor PLLC
2580 Anthem Village Dr, Henderson NV 702-750-9139
3. **Kimberly Maxon-Rushton** on behalf of RSR Analytical Laboratories
krushton@cooperlevenson.com 702-832-1900
4. **Logan Wilson** of Jennings & Fulton on behalf of 374 Labs, G3 Labs, M&A Associates, ERP, NV Cann Labs, RSR Analytical Laboratories, DPL Nevada LLC
2580 Sorrel St, Las Vegas, NV 89146 702-979-3565

Adoption Hearing June 18, 2026

Cannabis Compliance Board Executive Director Michael Miles
Cannabis Compliance Board Deputy Director Steve Gilbert
Lyn Kogler, Lab Compliance Supervisor, Cannabis Compliance Board
Senior Deputy Attorneys General Emily Bordelove and Matthew Feeley represented the Cannabis Compliance Board.

1. **Will Adler**, representing Silver State Government Relations
204 N. Minnesota St., St. J, Carson City, NV 89703 775-636-3350
2. **Adora Williams** of Caliente Extracts
3. **Amber Jansen** representing Talkin and Tokin
4. **Gerardo Gonzalez** representing Talkin and Tokin
5. **Layke Martin** on behalf of the Nevada Cannabis Association
702-483-7255
6. **Amanda Connor** of Connor & Connor PLLC
2580 Anthem Village Dr, Henderson NV 702-750-9139
7. **Adam Fulton** of Jennings & Fulton on behalf of Digipath Labs, MA Associates, NV Cann Labs, RSR Analytical, Ace Analytical Laboratories, 374 Labs and G3 Labs
2580 Sorrel St, Las Vegas, NV 89146 702-979-3565