

Department of Cannabis Control

Consolidated Regulatory Text Modifications

This chart provides a comparison of the Department of Cannabis Control's (DCC) emergency consolidated commercial cannabis regulations and the permanent regulations adopted to replace the emergency regulations. This document is intended as a tool to assist stakeholders in understanding which rules have changed.

The emergency regulations column displays what went into effect on March 4, 2022. The adopted rule column displays what went into effect on November 7, 2022 and is the current requirement. This document only addresses provisions that were included in the consolidated rulemaking packages. A complete set of the DCC's regulations, can be found in California Code of Regulations, title 4, division 19 or under current regulations on the DCC website.

Section Topic	Emergency Regulations	Adopted Rule
Definitions §15000	<ul style="list-style-type: none">• Contains definitions applicable to all license types. Includes definitions created by DCC and repeats important definitions from the Act.	<ul style="list-style-type: none">• Definition of cannabis concentrate amended to replace a definition of kief with the word kief and add butter.• Definition of cannabis goods amended to specify that they are goods packaged and labeled as they will be sold at retail.• Definition of final form amended to clarify that it refers to cannabis and cannabis products that are in the form in which they will be consumed or used.• Definition of immature plant amended to clarify that, for purposes of cultivation, it includes a vegetatively propagated mass of roots with a one-half inch width that is outside of a tissue container, or a tissue container.• Definition of manufacture amended to clarify that post-extraction processing means a process by which one or more active cannabinoids in cannabis concentrate are further concentrated either by chemical or physical means.• Definition of mixed-light cultivation amended to remove light deprivation as an activity limited to mixed-light cultivation.• Definition of nonmanufactured cannabis products amended to include leaf, pre-roll filter tips, or paper.

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		<ul style="list-style-type: none"> • Definition of outdoor cultivation amended to remove exclusion of light deprivation. • Definition of processing amended to add sifting to the included activities. • Definition of terpenes added to clarify that the term includes terpenoids, flavonoids, polyphenols, and other naturally occurring phytochemicals and secondary metabolites that contribute to the natural flavor and aroma of cannabis. • Definition of tincture amended to clarify that the term vegetable includes botanically classified fruits and vegetables and their seeds.
<p>General Requirements §15000.1</p>	<ul style="list-style-type: none"> • Requires persons conducting commercial cannabis activity to obtain and maintain a valid license for each separate premises where commercial cannabis activity is conducted. • Requires commercial cannabis activity to be conducted between licensees but allows retail licensees to conduct sales to customers and nonprofits. • States that a licensee shall only conduct commercial cannabis activities authorized by their license on the premises licensed for that activity. • Requires all transfers of cannabis and cannabis products shall be conducted by a licensed distributor. • States that licenses shall not be transferrable or assignable to another person or premises. • Requires applicants and licensees to use their legal business name on all documents related to commercial cannabis activity. 	<ul style="list-style-type: none"> • No change from emergency regulation.

Section Topic	Emergency Regulations	Adopted Rule
A- and M-Designations §15000.2	<ul style="list-style-type: none"> • Contains the requirements specific to adult-use and medicinal cannabis licenses. • States that licensees may conduct business with other licensees irrespective of the Adult-Use or Medicinal designation on their licenses. • Provides that licensed distributors or microbusinesses engaging in distribution activities may only transport medicinal cannabis goods to a retail licensee with a medicinal designation on their license. • Provides that a retail licensee may only sell medicinal cannabis goods to medicinal customers. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Premises Location §15000.3	<ul style="list-style-type: none"> • Provides that a licensed premises shall not be in a location that requires persons to pass through a business that sells alcohol or tobacco or a private residence to access the licensed premises. • Provides that a licensed premises shall not be in a location that requires persons to pass through the licensed premises to access a private residence or business that sells alcohol or tobacco. • Provides that a licensed premises shall not be located within a private residence with the exception of cultivation licensees. • Requires licensees to provide the DCC with immediate access to their licensed premises and that denial of access is subject to discipline. • Provides that nothing in this section shall be interpreted to prohibit two or more licensed premises from occupying separate portions of the same parcel of land or sharing common use areas (e.g., bathroom, breakroom, hallway, building entrance). 	<ul style="list-style-type: none"> • Replaces the prohibition on licensed premises located within private residences with a prohibition on including the living areas of private residences in licensed premises. Applies to all DCC licensees. • Creates a carve-out allowing living areas of a private residence to be included on the premises diagram if the local jurisdiction requires such living areas to be included in the licensed premises and specifies that commercial cannabis activity cannot occur in designated living areas. • Clarifies that nothing in this section prohibits a licensee from utilizing the living areas of a private residence for non-commercial cannabis activity such as staff breaks. • Clarifies that areas of a private residence that are not considered to be living areas may include garages, offices, sheds, barns, and other areas regularly used for commercial cannabis activity. • Clarifies that structures included as part of the licensed premises must be permanent structures including, but not limited to, buildings, barns, sheds, shipping containers, and modular buildings. Removes the specification that permanent structures must be permanently affixed to the land. Applies to all DCC licensees.

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	<ul style="list-style-type: none"> • Requires that all structures included as part of the licensed premises be permanently affixed to the land and provides examples of structures that are not considered to be permanent structures. This provision is not applicable to cultivation licensees. 	<ul style="list-style-type: none"> • Adds a prohibition on personal cultivation occurring on the licensed premises. Creates an exemption to the prohibition on personal cultivation if the local jurisdiction requires the licensed premises to include all areas of the land, provided that personal cannabis is cultivated and maintained separately and distinctly from commercial cannabis in an area identified on the premises diagram and is prevented from coming into contact with commercially cultivated cannabis. • Provides six-month grace period for licensees to come into compliance with the prohibition on utilizing private living areas for commercial cannabis activity and requirement for structures to be permanent.
Subletting of Premises §15000.4	<ul style="list-style-type: none"> • Prohibits subletting except for manufacturing licensees operating as a licensed shared-use facility in accordance with requirements for shared-use facilities in Article 2, Chapter 8. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Licensee's Responsibility for Acts of Employees and Agents §15000.5	<ul style="list-style-type: none"> • Provides that a licensee is responsible for the acts, omissions, or failures of persons acting on behalf of the licensee and within the scope of their employment. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Age Restriction §15000.6	<ul style="list-style-type: none"> • Provides that employees or persons retained by a licensee to work within or on a licensed premises, or handle cannabis or cannabis products, shall be at least 21 years of age. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Storage of Inventory §15000.7	<ul style="list-style-type: none"> • Requires all cannabis inventory stored on a licensed premises to be secured in a limited-access area. • Prohibits a licensee from storing cannabis goods outdoors. This only applies to cannabis goods which is defined as cannabis and cannabis products in final form. • Requires employee break rooms, changing facilities, and bathrooms to be separate from all storage areas. • Requires all cannabis and cannabis products to be stored on a licensed premises. 	<ul style="list-style-type: none"> • Removes the requirement that all inventory stored on a licensed premises be stored in a limited access area. • Requires that employee bathrooms and changing facilities be separated from all storage areas by solid walls extending from floor to ceiling. • Requires that employee break areas, if any, be separate and distinct from areas where cannabis and cannabis products are stored. • Adds a provision allowing the use of shipping containers as temporary storage space on a licensed premises in addition to those used as part of the premises. Requires licensees using

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		storage containers as temporary storage to notify the DCC of the modification to the premises.
Provisional Licenses §15001	<ul style="list-style-type: none"> • Provides that a provisional licensee shall follow the rules and regulations applicable to a licensee holding an annual license of the same type. • Provides that a provisional license does not create a vested right in the holder to renewal of the provisional license or issuance of an annual license. • Enables the DCC to cancel a provisional license in certain circumstances, including issuance of an annual license, denial of an annual license, abandonment of an application for licensure, withdrawal of an application for licensure, or surrender of the provisional license. • Informs provisional licensees that they may only continue to maintain a provisional license if they are actively and diligently pursuing requirements for an annual license. This includes paying the license fee within 60 days. Plus providing all requested information to DCC or a statement why it cannot be provided due to circumstances beyond their control by response date or within 30 days if no response date is provided. • Informs prospective licensees that when the DCC decides not to issue a provisional license to the applicant, they are not entitled to a hearing or an appeal of the decision. • Informs applicants that no provisional license issued by DCC shall be effective after January 1, 2026. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Issuance of Provisional License §15001.1	<ul style="list-style-type: none"> • Outlines the general timelines for issuance of non-cultivation provisional licensees; cultivation provisional licensees; and equity licensees. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Renewal of Provisional	<ul style="list-style-type: none"> • Requires provisional licensees to comply with the renewal procedures in section 15020 and the requirements of section 15001.2. 	

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License §15001.2	<ul style="list-style-type: none"> • Outlines additional information required for provisional license renewals based on when the provisional license is renewed. • Specifies certain circumstances when DCC will not renew a provisional license authorizing cultivation. 	
Notice of Provisional License Review § 15001.3	<ul style="list-style-type: none"> • Requires DCC to notify the provisional licensee that it is considering revoking, suspending, or denying renewal of the provisional license. Provides them an opportunity to provide information related to the proposed action for consideration by the DCC. • Provides that DCC issue a Notice of Provisional License Review to the licensee for failure to comply with MAUCRSA or its implementing regulations. • Provides that the Notice of Provisional License review shall be in writing and describe the nature and facts of each violation, including a reference to the statute or regulation violated; the manner in which the provisional licensee must correct the violation(s) to achieve compliance; that DCC is considering the possibility of suspending, revoking, or denying the provisional licensee's renewal; and that the provisional licensee may request an informal meeting and provide DCC with information related to the observed violations and potential license action for DCC's consideration during its provisional license review. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Immediate Suspension of Provisional License §15001.4	<ul style="list-style-type: none"> • Allows DCC to take immediate action on provisional licensees to safeguard the public health, safety, and welfare, in relation to a provisional license. • Provides that DCC may immediately suspend any provisional license or impose licensing restrictions upon any provisional licensee if permitting the provisional licensee to continue to engage in licensed activity would endanger the public health, safety, or welfare. 	<ul style="list-style-type: none"> • No change from emergency regulation.

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	<ul style="list-style-type: none"> • Provides that the immediate suspension of a provisional license be in writing and what the suspension notice must describe. • Provides that following the issuance of an Immediate Suspension under this section, DCC shall serve the provisional licensee with a Notice of Provisional License Review pursuant to section 15001.3. 	
Annual License Application Requirements §15002	<ul style="list-style-type: none"> • Contains the general requirements for an application for a cannabis license. • Removes military priority processing. • Removes requirements for information about other state cannabis licenses. • Limits submittal of business-formation documents to documents not available through the Secretary of State, including operating agreements, bylaws, and other documents that establish ownership or control over the business, upon request. • Removes the requirement to provide financial information including a list of funds, loans, investments, and gifts. • Specifies required disclosures for financial interest holders that are individuals and that are business entities. • Updates labor peace agreement requirements to include notarized statement for employer with less than 20 employees. • Updates consistent with AB 2138 not requiring disclosure of convictions and making rehabilitation information voluntary. 	<ul style="list-style-type: none"> • Adds clarification that assessor parcel number is an option for address of the premises. • Adds a passport as an acceptable form of government-issued identification. • Reincorporates the requirement to provide a copy of the signature page of the labor peace agreement if the business has entered into one.

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	<ul style="list-style-type: none"> • Allows one bond for all licenses with total amount equaling \$5,000 per license, rather than a separate bond for each license. 	
Temporary Cannabis Event Application §15002.1	<ul style="list-style-type: none"> • Contains the general requirements for a temporary cannabis event license application. 	<ul style="list-style-type: none"> • Allows for the assessor parcel number or a street description if no address exists for the location where the temporary cannabis event will be held. • Requires disclosure of all licensees participating in the event and all areas where cannabis and cannabis products will be displayed or sold. • Requires disclosure of all non-cannabis vendors. • Removes requirement to disclose employees of retailers. • Requires disclosure, on the premises diagram, of a limited-access area that can only be accessed by the cannabis event organizer and DCC representatives.
Owners of Commercial Cannabis Businesses §15003	<ul style="list-style-type: none"> • Specifies who is considered an owner. • Provides examples of individuals who are considered to manage, direct, or control the operations of a commercial cannabis business and would be considered owners who would assume responsibility for the license. • Provides that, where a commercial cannabis business is owned in whole or part by an entity, and the entity includes individuals who manage, direct or control the operations of the commercial cannabis business, those individuals must also be disclosed as owners. • Provides that upon notification by DCC, an applicant or licensee must disclose additional individuals as owners and submit the required ownership information or, in the alternative, demonstrate that the individual does not qualify as an owner. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Financial Interest in a	<ul style="list-style-type: none"> • Clarifies what individuals are considered financial interest holders of a commercial cannabis business, 	<ul style="list-style-type: none"> • Adds a person that has entered into an intellectual property licensing agreement for a share of the profits as an example of

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Commercial Cannabis Business §15004	<p>including a person with an aggregate ownership interest of less than 20 percent; a person providing a loan to the commercial cannabis business; a person that contracts with the cannabis business to cultivate, manufacture, package or label cannabis goods under their brand name; and a person entitled to receive 10 percent or more of the profits of the commercial cannabis business.</p> <ul style="list-style-type: none"> • Clarifies that banks and other financial institutes that provide loans; individuals whose only financial interest is through an interest in a diversified mutual fund, blind trust, or similar instrument; individuals whose only financial interest is a security, lien, or encumbrance; and individuals who hold a share of stock that is less than 10 percent (formerly 5 percent) of the total shares in a publicly traded or privately held company are not required to be identified as a financial interest in the commercial cannabis business. 	<p>individuals who are considered financial interest holders of a commercial cannabis business.</p>
Independence of Testing Laboratories §15004.1		<ul style="list-style-type: none"> • Added to clarify that a licensed testing laboratory must be independent from persons that hold a license or an interest in a commercial cannabis business licensed for any activity other than testing. • Prohibits a licensed testing laboratory from leasing real or personal property from a licensee for any activity other than testing. • Prohibits a licensed testing laboratory from employing any person employed by a licensee for any activity other than testing. Prohibits laboratory from employing an owner or financial interest holder of a licensee for any activity other than testing. • Prohibits a licensed testing laboratory from offering or agreeing to provide preferential treatment, including discounted testing services, to any other licensee unless the offer or agreement is available to all licensees.
Personnel Prohibited from	<ul style="list-style-type: none"> • Prohibits state officials and employees, as well as peace officers from ownership, directly or indirectly, in a license. 	<ul style="list-style-type: none"> • No change from emergency regulation.

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Holding Licenses §15005		
Premises Diagram §15006	<ul style="list-style-type: none"> • Requires identification of the boundaries of the property, or parcel of land, and the proposed premises. Note - a premises may occupy only a portion of the property. • Requires that the diagram be to scale, show areas where commercial cannabis activities will occur, and show any shared areas and separate entrances if more than one licensee is on the property. • Contains additional requirements for cultivators. 	<ul style="list-style-type: none"> • Clarifies that the dimensions required on the diagram are the dimensions of the boundaries of the premises to readily identify the bounds of the premises. • Clarifies that the diagram must be to scale to readily determine the bounds of the premises. • Removes requirement for diagram to be in black and white and not contain any highlighting. • Removes requirement for the premises to have designated areas for physically segregating cannabis or nonmanufactured products subject to an administrative hold. • Clarifies canopy dimensions. • Clarifies that harvested cannabis storage areas may not be shared among multiple licenses held by one licensee. • Adds requirement for inclusion on diagram of a closed-loop extraction system's location and serial number.
Landowner Approval §15007	<ul style="list-style-type: none"> • Requires landowner approval indicating that the applicant has the right to occupy the property and acknowledging that the property may be used for commercial cannabis activity for which the license is sought. • Requires a copy of the lease if there is one. • Requires a copy of the deed or title to the property if the applicant owns it. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Limited Waiver of Sovereign Immunity §15009	<ul style="list-style-type: none"> • Applies to all applicants and licensees of all licenses issued by the DCC and contains the same language from prior regulations. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Compliance with the California Environmental	<ul style="list-style-type: none"> • Provides that applicants may refer to the appropriate environmental review considerations in CEQA and its implementing guidelines. 	<ul style="list-style-type: none"> • No change from emergency regulation.

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Quality Act (CEQA) §15010	<ul style="list-style-type: none"> • Provides that an applicant must provide certain information to enable DCC to determine the scope of environmental review under the CEQA Guidelines including evidence of CEQA compliance or license specific information that would enable DCC to determine the appropriate level of environmental review under CEQA. • Allows DCC to charge the applicant for costs to prepare any supplemental environmental review, including DCC's costs for procedures to comply with CEQA unless DCC specifies otherwise. • Repeals prior CEQA forms and provides for a new CEQA form for use by all license types. 	
Additional Information §15011	<ul style="list-style-type: none"> • Consolidates application requirements that are unique to specific license types. • Amends provisions related to evidence of vehicle ownership for distributors, retailers, and testing laboratories. • Limits required operating procedures to be provided upon request for manufacturers, distributors, retailers, and testing laboratories (certain SOPs). Provides they may be requested during application process or anytime thereafter. 	<ul style="list-style-type: none"> • Removes the requirement for cultivators to provide a minimum of two hours of operation between 8:00am and 5:00pm on each day, Monday through Friday. • Allows applicants to include annual scheduled closure periods for their site. • Removes the requirement to provide a document evidencing approval of an extraction operation by a local fire code official at time of application. • Limits required operating procedures to be provided upon request for manufacturers, distributors, retailers, and testing laboratories (certain SOPs). Consolidates SOPs into one form.
Incomplete and Abandoned Applications §15012	<ul style="list-style-type: none"> • Provides that DCC will issue a notice informing the applicant when their application is incomplete and identifying the missing information. • Provides application will be deemed abandoned if the information is not provided within 180 days of notice. • Requires payment of license fee within 60 days or application is deemed abandoned. 	<ul style="list-style-type: none"> • Adds email as method of issuing notice for consistency with other notice requirements.

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	<ul style="list-style-type: none"> • States application fees will not be refunded for abandoned applications. • Provides applicant may reapply following an abandoned application through new application and fee. 	
Withdrawal of Application §15013	<ul style="list-style-type: none"> • Allows for withdrawal any time prior to the issuance or denial of license. • Provides withdrawal does not prevent DCC from proceeding with a denial action. • States application fees will not be refunded for withdrawn applications. • Provides applicant may reapply following a withdrawn application through new application and fee. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Fees §§15014-15015	<ul style="list-style-type: none"> • Makes fee for all licenses for premises modification consistent at \$500. Exempts cultivators. • Specifies how licensing fees may be paid. • Outlines penalty fees for failure to pay the appropriate license fee which includes balance of fee and 50% penalty. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Substantially Related Offenses and Criteria for Rehabilitation §15017	<ul style="list-style-type: none"> • Incorporates Assembly Bill 2138 modifications to ensure regulations match with current statute. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Additional Grounds for Denial of a License §15018	<ul style="list-style-type: none"> • Provides that an application is subject to denial if the applicant denied the DCC access to the property identified in the application as the premises. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Renewal of License §15020	<ul style="list-style-type: none"> • Clarifies that if a licensee does not submit a complete renewal within 30 days after the expiration of the license forfeits their eligibility to renew the 	<ul style="list-style-type: none"> • No change from emergency regulation.

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	<p>license and will be required to submit a new license application.</p> <ul style="list-style-type: none"> • Clarifies late renewal fees of 50% for all license types. 	
Denial of License §15021	<ul style="list-style-type: none"> • Allows individuals to send hearing requests to the DCC by electronic mail. • To be consistent with Assembly Bill 2138, provides that where an application is denied due to an owner's conviction history, the DCC will notify the applicant of this fact and provide information on how to request a copy of their conviction history and how to question the accuracy of the record. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Business Modifications §15023	<ul style="list-style-type: none"> • Requires all licensees to use the DCC-LIC-027 for Notifications related to Labor Peace Agreements, ownership, A- and M- designation, business names, and financial information. • Specifies that licenses are not transferrable or assignable to another person. • Maintains prior ownership change rules that allow a licensee to add new owners and continue operating so long as at least one existing owner will remain under the new ownership structure. This means that when a person/entity such as a corporation is the holder of the license, new owners such as a new CEO, Director, President, etc., may be added to the license without submitting an entirely new application because the license will still be held by the same corporation. If the commercial cannabis business is being bought by a new person, such as a new corporation, a new application is required. 	<ul style="list-style-type: none"> • Clarifies that, following a change in ownership, the former owner's inventory will be transferred to the new owner's account upon issuance of the license.
Death, Incapacity, or Insolvency of a Licensee §15024	<ul style="list-style-type: none"> • Consolidates and makes consistent existing sections regarding the death, incapacity, or insolvency of a licensee. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Cannabis and Cannabis Products After	<ul style="list-style-type: none"> • Allows for sale of stock of cannabis and cannabis products after termination of license. 	<ul style="list-style-type: none"> • No change from emergency regulation.

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Termination of License §15024.1	<ul style="list-style-type: none"> • Provides the process for a licensed distributor or microbusiness authorized to engage in distribution to request authorization for procuring cannabis and cannabis products. • Specifies where the cannabis and cannabis products procured under this section may be transported to. 	
Additional Premises Requirements for Retailers and Microbusinesses Engaging in Retail §15025	<ul style="list-style-type: none"> • Amended to apply specifically to retailers and microbusinesses authorized to engage in retail. • Prohibits alcoholic beverages from being stored or consumed on the premises. • Requires that a licensed retailer or microbusiness authorized to conduct retail sales that is next to a manufacturing, cultivation, or distribution premises be separated from those premises by walls, and all doors to the other premises must remain closed. The plain meaning of walls applies here. For reference the definition of wall includes the following: one of the sides of a room or building connecting floor and ceiling or foundation and roof. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Modification of Premises Operations §15027	<ul style="list-style-type: none"> • Requires that licensees submit the DCC-LIC-027 for modifications to premises and pay a \$500 fee. • Provides that cultivators must submit through the online system but are not required to pay a fee. 	<ul style="list-style-type: none"> • Streamlines the modification process by specifying modifications for each license type that require prior approval by the DCC and allows for notification of modifications where prior approval is unnecessary. • Provides all licensees with the option of submitting requests and notifications of business modifications through the online licensing system or by submitting a form.
Significant Discrepancy in Inventory §15034	<ul style="list-style-type: none"> • Applies to only licensed retailers, licensed distributors, or licensed microbusinesses authorized to engage in retail or distribution. 	<ul style="list-style-type: none"> • Applies to all DCC licensees.
Notifications of Criminal Acts, Civil Judgments, Violations of	<ul style="list-style-type: none"> • Consolidates and clarifies existing language regarding notifications to DCC of criminal convictions of any owner, civil penalties or judgments rendered against the licensee or any 	<ul style="list-style-type: none"> • Requires a licensee to notify the DCC of revocation of a local license held by the licensee or any owner in their individual capacity.

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Labor Standards, and Revocation of a Local License, Permit, or Other Authorization After Licensure §15035	owner, administrative orders or civil judgments for violations of labor standards, or a revocation of a local license, permit or other authorization.	
Notification of Theft, Loss, and Criminal Activity §15036	<ul style="list-style-type: none"> • Consolidates and clarifies requirements for a licensee to notify DCC and local law enforcement of the discovery of a significant discrepancy in inventory, diversion, theft, loss, or criminal activity. 	<ul style="list-style-type: none"> • No change from emergency regulation.
General Record Retention Requirements §15037	<ul style="list-style-type: none"> • Defines what must be stored and maintained as a record –financial records; personnel records; training records; contracts; local authorizations; documents prepared or executed by licensee in connection with the commercial cannabis business; and those required by MAUCRSA or regulations. • Provides that records must be kept for at least 7 years. • Provides that records may be electronic or in hard-copy. • Provides that records must be legible, accurate and not contain intentional misrepresentation or false information. • Provides that records must be stored in an area protected from debris, moisture, contamination, hazardous waste, and theft. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Disaster Relief §15038	<ul style="list-style-type: none"> • Specifies the information that licensees must provide to DCC when requesting relief pursuant to this section. 	<ul style="list-style-type: none"> • No change from emergency regulation.
License Posting Requirement §15039		<ul style="list-style-type: none"> • Applies to all DCC licensees.

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<p>Posting and Advertising §§15040-15041.1</p>	<ul style="list-style-type: none"> • Provides guidelines regarding how licensees may ensure their advertising and marketing is tailored to appropriate audiences and not children (i.e., ensuring advertising is not “attractive to children”). • Removes approval process for branded merchandise only applicable to former Bureau of Cannabis Control licensees. • Specifies licensees shall not advertise free cannabis goods or accessories. Note - BPC §26153 prohibits a licensee from giving away any amount of cannabis or cannabis products, or any cannabis accessories, as part of a business promotion or other commercial activity. Trade samples are not considered a business promotion or other commercial activity. • Provides additional clarification regarding branded merchandise license number requirements – license number must be permanently affixed to branded merchandise, be legible, and clearly visible from outside of merchandise beginning January 1, 2022. • Specifies that advertising and marketing, including branded merchandise must not be attractive to children. • Removes prohibition against giving away any type of products; limit on promotions applies to cannabis, cannabis goods, and cannabis accessories. 	<ul style="list-style-type: none"> • §15040.1 applies to all DCC licensees. Specifies that licensees cannot market and advertise cannabis goods that are labeled with terms used to describe alcohol. Clarifies that this section does not prohibit the use of a company name or brand name that is also associated with alcohol, provided the cannabis goods meet the requirements of this section. • §15040.2 added to clarifies that licensees shall not give away any amount of cannabis or cannabis products, or any cannabis accessory, as part of a business promotion and specifying licensees may not hold raffles or sweepstakes as part of a business promotion. • §15041.1 amended to remove expired grace period on branded merchandise.
<p>Trade Samples §§15041.2-15041.7</p>	<ul style="list-style-type: none"> • Defines what constitutes a trade sample and provides general provisions related to trade samples. • Provides once designated as trade samples the designation cannot be changed. • Provides that distributor-transport only, testing laboratories, and cannabis event organizers may 	<ul style="list-style-type: none"> • §15041.2 allows immature plants, seeds and propagated material to be designated or provided to licensees as trade samples by licensed nurseries. • §15041.3 allows the designation of trade samples to be changed to medicinal donation by the licensee originally designating the cannabis or cannabis products as a trade sample. • §15041.4 clarifies the requirements for providing trade samples to a licensee’s employees.

Section Topic	Emergency Regulations	Adopted Rule
	<p>not provide or receive trade samples. Retailers may receive but not provide trade samples.</p> <ul style="list-style-type: none"> • Provides the rules regarding the consumption of cannabis goods that have been designated as trade samples, including that they must be tested, packages as required by MAUCRSA, and have the required trade sample language on the package. • Provides the quantity limits for designating and providing trade samples. • Clarifies which type of cannabis goods cannot be used as trade samples. 	
<p>Premises Access Requirements §15042</p>	<ul style="list-style-type: none"> • Applies to all DCC licensees including cultivators and manufacturers. • Requires for all premises not open to the public that the licensee establish and implement an identification and sign-in/sign-out procedure for all persons accessing the premises, including authorized individuals, suppliers, and visitors. Note - only licensed retailers and microbusinesses authorized to engage in onsite retail sales are open to the public. • Requires licensees to ensure that only employees of the licensee and other authorized individuals access the limited-access area of the premises. Note - limited-access area is defined in section 15000(II) and means an area in which cannabis or cannabis products are stored or held and is only accessible to a licensee and authorized persons. • Provides that individuals who are not employees, must be escorted by an employee of the licensee at all times while within the limited-access area. • Requires that licensees maintain a record of all authorized-individuals who are not employees of the licensee who enter the limited-access areas. The 	<ul style="list-style-type: none"> • No change from emergency regulation.

Section Topic	Emergency Regulations	Adopted Rule
	<p>record must include the name of the individual, the company the individual works for, the reason the individual entered the limited-access area, the date, and the time the individual entered and exited. These records must be made available to DCC immediately upon request.</p> <ul style="list-style-type: none"> • Prohibits a licensee from receiving consideration or compensation for permitting an individual to enter the limited-access areas. 	
Security Plan for Licensed Manufacturers §15042.1	<ul style="list-style-type: none"> • Requires licensed manufacturers to develop and implement a written security plan. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Licensee Employee Badge Requirement §15043	<ul style="list-style-type: none"> • Requires all employees, agents, officers, or other persons acting for a licensee, who is participating in a temporary cannabis event to display a laminated or plastic-coated identification badge issued by the licensee at all times while engaging in commercial cannabis activity. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Video Surveillance System §15044	<ul style="list-style-type: none"> • Does not apply to a premises authorized exclusively for cultivation activities or the cultivation area of a licensed microbusiness premises. • Does not apply to licensed distributor-transport only licensees engaged in self-distribution whose premises is on the same parcel of land as their licensed cultivation premises. • Provides that, if multiple licensed premises are within the same building, a single video surveillance system covering the entire building may be used by all of the licensees if all licensees have immediate access to the surveillance recordings. Provides that all licensees will be held responsible and subject to discipline for any violations of the video surveillance requirements. 	<ul style="list-style-type: none"> • Clarifies that the displayed date and time on recorded images must not cover the view of recorded images in a manner that prevents the ready identification of any person or activity in the captured image.
Security Personnel §15045	<ul style="list-style-type: none"> • Licensed retailers and microbusinesses authorized to engage in retail sales who are open to the public must hire or contract for security personnel who are at least 21 years of age to provide onsite security 	<ul style="list-style-type: none"> • No change from emergency regulation.

Section Topic	Emergency Regulations	Adopted Rule
	<p>services for the licensed premises during hours of operation.</p>	
Locks §15046	<ul style="list-style-type: none"> • Applies to all licensed premises except a licensed premises authorized exclusively for cultivation activities or the cultivation area of a licensed microbusiness. • Requires all limited-access areas and points of entry and exit to the licensed premises to be securely locked using commercial-grade, nonresidential door locks. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Alarm System §15047	<ul style="list-style-type: none"> • Applies to all licensed premises except a licensed premises authorized exclusively for cultivation activities or the cultivation area of a licensed microbusiness. • Licensees must maintain an alarm system that meets the specific requirements of this section. • If multiple licensed premises are within the same building, a single alarm system covering the entire building may be used by all of the licensees if all licensees are able to make available to DCC all information related to the alarm system, monitoring, and alarm activity. If sharing, all licensees will be held responsible and subject to discipline for any violations of the alarm system requirements. 	<ul style="list-style-type: none"> • Clarifies that multiple licensed premises that are contained within the same building or on the same parcel of land may utilize a single alarm system covering the entire building or parcel of land under certain circumstances.
Track and Trace §§15047.1-15052	<ul style="list-style-type: none"> • For clarity, includes definitions for “plant tag”, “package tag” and “wholesale cost”. • Removes temporary license section, which is no longer necessary. • Repealed prohibition on returns. Licensees may return cannabis and cannabis products in accordance with the provisions of MAUCRSA and the regulations. 	<ul style="list-style-type: none"> • Removes “RFID” from the definition of plant tag. • Allows for batch harvesting and recording the wet weight of each harvest batch rather than each individual plant. • Clarifies that tags may not be reused and how they are to be discarded. • §15052 added to clarify requirements for returns. • Allows returns between licensees for any lawful business purpose.

Section Topic	Emergency Regulations	Adopted Rule
		<ul style="list-style-type: none"> • Requires returned products to undergo a new round of testing and quality assurance prior to being transported to a retailer.
Acceptance or Rejection of Shipments §15052.1		<ul style="list-style-type: none"> • Requires that the licensee that originated a rejected shipment physically accept the rejected shipment and record it in the track and trace system.
Storage Services §15301		<ul style="list-style-type: none"> • Allows cannabis goods held for storage-only to be distributed from the premises of the distributor providing storage-only services.
Packaging, Labeling, and Rolling §15303	<p>Eliminates packaging and labeling requirements as the packaging and labeling requirements for all licensees have been consolidated and placed in Chapter 11.</p>	<ul style="list-style-type: none"> • Aligns the requirements of pre-rolls by requiring distributors to package and label pre-rolls prior to regulatory compliance testing.
Regulatory Compliance Testing Results §15306		<ul style="list-style-type: none"> • Clarifies requirements related to batches that fail regulatory compliance testing and remediation of those batches. • Allows for the certificate of compliance to be provided electronically. • Specifies that the distributor shall destroy a failed batch that cannot be remediated within 60 days of failure of the batch or within 30 days of receiving notification from the DCC that the batch may not be remediated.
Quality-Assurance Review §15307		<ul style="list-style-type: none"> • Clarifies requirements related to cannabis goods that are found to be not fit for sale during quality-assurance review. • Provides that a distributor may relabel cannabis goods but may not remediate them.
Licensed Distributor to Licensed Distributor Transfers §15307.2		<ul style="list-style-type: none"> • Clarifies that retesting of cannabis goods that have not been transported to retail within 12 months of the date on the certificate of analysis may be retested only if the cannabis goods have not been modified in any way. • Requires that a licensed distributor, manufacturer, or microbusiness authorized to engage in manufacturing submit a corrective action plan and receive approval from the DCC before re-packaging, re-labeling, reformulating, or modifying cannabis goods.

Section Topic	Emergency Regulations	Adopted Rule
Requirements for the Transportation of Cannabis and Cannabis Products §15311		<ul style="list-style-type: none"> • Clarifies that the licensee is not required to be the sole owner or lessor of the vehicle or trailer and all owners and lessors may use the vehicle for non-commercial cannabis activity. • Clarifies that the required motor carrier permit must be issued to the licensed distributor. • Makes less burdensome the requirements for enclosing cannabis and cannabis products during transport. Requires a secured area that may be comprised on three sides of any part of the body of the vehicle.
Required Transport Vehicle Information §15312	<ul style="list-style-type: none"> • Specifies that upon request, licensees must provide DCC with information, such as year, make, and model, about each vehicle and trailer used to transport cannabis and cannabis products. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Shipping Manifest §15314	<ul style="list-style-type: none"> • Eliminates language regarding temporary licensees who do not have access to the track and trace system, as the language is no longer necessary. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Customer Access to the Retail Area §15402		<ul style="list-style-type: none"> • Adds curbside delivery as an allowable activity for storefront retailers and clarifies the requirements for curbside delivery.
Sale of Non-Cannabis Goods §15407	<ul style="list-style-type: none"> • Allows retailers to sell the branded merchandise of any licensed commercial cannabis business. 	<ul style="list-style-type: none"> • Allows retailers operating a consumption area to sell prepackaged non-cannabis infused and non-alcoholic food and beverages if allowed by the local jurisdiction. • Clarifies that consumers may bring or receive non-cannabis infused and non-alcoholic food and beverages for consumption in a designated consumption area.
Sale of Live Plants and Seeds §15408	<ul style="list-style-type: none"> • Clarifies and makes consistent requirements related to the sale of immature plants (i.e., immature plants sold at retail must be shorter and narrower than 18 inches). • Eliminates packaging and labeling requirements as the packaging and labeling requirements for all 	<ul style="list-style-type: none"> • No change from emergency regulation.

Section Topic	Emergency Regulations	Adopted Rule
	licensees have been consolidated and placed in Chapter 11.	
Requirements for Providing Free Cannabis Goods to Medicinal Consumers §15411		<ul style="list-style-type: none"> • Adds requirements for providing free cannabis goods to medicinal consumers. • Specifies verification and record keeping requirements.
Delivery Employee §15415		<ul style="list-style-type: none"> • Allows for receipt of cannabis goods only during hours of operation. • Requires a delivery employee to return to the premises at the end of the day only if they have unsold cannabis goods to return to the premises.
Delivery Vehicle Requirements §15417		<ul style="list-style-type: none"> • Makes the requirements for enclosing cannabis goods during delivery less burdensome. Requires a secured area that may be comprised on three sides of any part of the body of the vehicle.
Cannabis Goods Carried During Delivery §15418	<ul style="list-style-type: none"> • Clarifies that delivery employees may also carry branded merchandise, in addition to cannabis, cannabis accessories, and promotional materials. 	<ul style="list-style-type: none"> • Increases the value of cannabis goods that may be carried during delivery to \$10,000 and removes the limit on carrying cannabis goods that have not yet been ordered.
Retailer Premises to Retailer Premises Transfer §15427	<ul style="list-style-type: none"> • Clarifies that to make a transfer of cannabis goods between two licensed retailers, the retail licenses must be held by the same sole proprietor or business entity. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Microbusiness §§15500, et seq.	<ul style="list-style-type: none"> • Provides that a microbusiness licensee must engage in at least three (3) of the following activities: cultivation, manufacturing, distribution, and retail. Note - microbusiness is defined in MAUCRSA under BPC 26000(aj) and means a licensee that is authorized to engage in cultivation of cannabis on an area less than 10,000 square feet and to act as a licensed distributor, Level 1 manufacturer, and retailer under this division. • §15500 specifies distributor transport-only as a qualifying activity. 	<ul style="list-style-type: none"> • No change from emergency regulation.

Section Topic	Emergency Regulations	Adopted Rule
Temporary Cannabis Event Requirements §15601		<ul style="list-style-type: none"> • Replaces the requirement that all participating employees be disclosed with the requirement that all participating vendors be disclosed. • Clarifies that all employees of licensees participating in an event must comply with the employee badge requirements. • Requires the event organizer to designate a limited-access area that can only be accessed by the licensee and the DCC.
Participation in Temporary Cannabis Events by Non-Retail Licensees §15603.1		<ul style="list-style-type: none"> • Added to clarify the requirements for participation in temporary cannabis events by non-retail licensees. • Provides limits on the amount of cannabis and cannabis products that may be displayed and how they may be displayed. • Allows cannabis and cannabis products for display purposes to be brought to the event by the licensee or their employee in accordance with personal possession limits for all adults. • Allows licensees to display cannabis accessories, packaging materials, promotional materials, and branded merchandise. • Allows licensees to sell branded merchandise and cannabis accessories in compliance with local and state laws.
Definitions §15700		<ul style="list-style-type: none"> • Clarifies the definition of certified reference material. • Amends definition of Total THC to incorporate Delta 8.
General Laboratory License Requirements §15701		<ul style="list-style-type: none"> • Provides that a licensed testing laboratory may test items not regulated by the DCC. • Requires that a licensed testing laboratory maintain separate and distinct records of activities regulated by the DCC and activities regulated by other divisions of law.
Chain of Custody (COC) §15706		<ul style="list-style-type: none"> • Adds licensed distributors to the list of licensees who may have produced a sampled batch.
Laboratory Transportation of Cannabis and	<ul style="list-style-type: none"> • Clarifies what must be provided to DCC, upon request, regarding a vehicle used to carry cannabis samples (i.e., copy of the certificate of ownership or 	<ul style="list-style-type: none"> • Makes less burdensome the requirements for enclosing cannabis and cannabis products samples during transport. Requires a

Section Topic	Emergency Regulations	Adopted Rule
Cannabis Products Samples §15709	registration card issued by the California Department of Motor Vehicles for each vehicle).	<p>secured area that may be comprised on three sides of any part of the body of the vehicle.</p> <ul style="list-style-type: none"> • Clarifies that all vehicles and trailers used for transportation must be owned or leased by the licensee but the licensee is not required to be the sole owner or lessor and all owners may use the vehicle for non-commercial cannabis activity.
Residual Solvents and Processing Chemicals Testing §15718	<ul style="list-style-type: none"> • Clarifies and makes consistent regulatory considerations related to tinctures. • Clarifies that the limit of ethanol does not apply to cannabis or cannabis products that are tinctures. 	
Cannabinoid Testing §15724	<ul style="list-style-type: none"> • Provides for a 12% deviation in total THC claimed to be present on a label, from the percentage of Total THC on the certificate of analysis, for edible cannabis products. 	<ul style="list-style-type: none"> • Provides for a 10% deviation in total THC and/or total CBD claimed to be present on a label, from the percentage on the certificate of analysis.
Certificate of Analysis (COA) §15726	<ul style="list-style-type: none"> • Allows for minor errors to be corrected on certificates of analysis to align with statutory requirements. • Clarifies what the DCC considers as minor errors on certificates of analysis. • Provides guidance regarding how licensed testing laboratories may request to correct minor errors on certificates of analysis and where to send such requests. 	<ul style="list-style-type: none"> • Provides an updated DCC email address and naming convention for the submission of the certificate of analysis.
Cultivation §§16201, et seq.	<ul style="list-style-type: none"> • Clarifies canopy, cultivation plan, and pest management plan requirements, no substantive changes to requirements. 	
General Cultivation Requirements §16202		<ul style="list-style-type: none"> • Removes the prohibition on outdoor cultivators using light deprivation.
Renewable Energy Requirements §16305	<ul style="list-style-type: none"> • Clarifies greenhouse gas calculation and reporting requirements (no substantive change to requirements). 	

Section Topic	Emergency Regulations	Adopted Rule
Generator Requirements §16306		<ul style="list-style-type: none"> • Clarifies that generator is also known as a diesel engine.
Canopy Requirements §16308		<ul style="list-style-type: none"> • Requires that seeds, immature plants, or propagated material received from a nursery as trade samples be cultivated in a canopy area dedicated to trade samples. • Requires canopy areas used to cultivate trade samples received from a nursery to be included in the aggregate square footage of the canopy areas. • Clarifies that canopy areas may be used to produce seeds for use by the licensee.
Supplemental Water Source Information §16311		<ul style="list-style-type: none"> • Allows for written documentation from the water supplier that service will be provided at the premises address. • Adds the requirement for location coordinates of rainwater catchment infrastructure.
License Constraints §17117		<ul style="list-style-type: none"> • Allows non-cannabis infused samples to be provided to all licensees except cultivators, distributors transport only, testing laboratories, and cannabis event organizers.
Solvent Use and Safety §§17202.1 – 17206.1	<ul style="list-style-type: none"> • Contains the requirements for both volatile and non-volatile extractions. • Establishes safety requirements for licensees that use a volatile solvent, flammable liquid, or a solvent that creates an asphyxiant gas in their manufacturing operations. • Describes areas in which extraction and post-extraction processing can be performed. • Requires licensee to establish and implement written procedures to ensure the closed-loop system is properly maintained and that routine verification is being conducted to ensure the system is operating in accordance with specifications and continues to comply with fire, safety, and building code requirements. Requires maintenance of written maintenance and verification logs. 	<ul style="list-style-type: none"> • Clarifies the ethanol requirements. • §17206.1 added to require that closed-loop extraction systems be certified prior to use. Provides that a closed-loop system must be recertified if the system is modified in a manner that its operation no longer conforms to the original equipment manufacturer's specifications.

Section Topic	Emergency Regulations	Adopted Rule
Quality Control Program §17208	<ul style="list-style-type: none"> • Clarifies what the quality control plan should include in the premises, equipment and utensils, personnel procedures, components, manufacturing processes and procedures • Clarifies one qualified individual or more should supervise the quality control program. 	
Good Manufacturing Practices §§17207 – 17218	<ul style="list-style-type: none"> • Clarifies requirements regarding components that are food to be obtained from a source that complies with federal and state food laws. • Clarifies the requirements for written personnel procedures that must be implemented. • Clarifies requirements that a licensed manufacturer implement a training program for personnel that covers specified information. • Amended batch production record requirements. 	<ul style="list-style-type: none"> • §17215 clarifies that manufacturers must identify cannabis products that are expected to leave the manufacturing premises in final form and packaged and labeled as they will be sold at retail.
Other Responsibilities §§ 17221, et seq.	<ul style="list-style-type: none"> • Contains other responsibilities applicable to all licensees under DCC, including responsibilities related to weighing devices and weighmasters, waste management, consent to sample collection, product complaints, voluntary recalls, and mandatory recalls. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Cannabis and Cannabis Products §§17300, et seq.	<ul style="list-style-type: none"> • Contains requirements for both manufactured and non-manufactured cannabis and cannabis products including requirements related to prohibited products, edible cannabis products, topical cannabis products, THC concentration limits, and failed batches. 	<ul style="list-style-type: none"> • §17300 removes caffeine from list of prohibited additives. <p>Adds prohibition on: 1) inhalable cannabis goods that are delivered into the lungs through a metered-dose inhaler or dry-powder inhaler; 2) cannabis goods that are administered through the eye or the nasal passages; and 3) cannabis goods that are injected into the body by piercing the skin.</p> <p>Clarifies that the prohibition on dry-powder and metered-dose inhalers does not extend to other dry-powder cannabis products or metered-dose vaporizers containing cannabis or cannabis oil.</p> <ul style="list-style-type: none"> • §17302.1 added to provide additional requirements for tinctures.

Section Topic	Emergency Regulations	Adopted Rule
		<p>Requires that tinctures be no more than 2 fluid ounces and include a calibrated dropper or similar device.</p> <ul style="list-style-type: none"> • §17303.1 added to provide additional requirements for inhaled products. Removes the requirement that terpenes be botanically derived and adds pre-roll filter tips as allowable component in inhaled products. • §17305 clarifies the process for remediation and adds the requirements for corrective action plans. <p>Requires a corrective action plan to include the UID for a batch, the size of the batch, and the email address of the manufacturer's contact person</p>
Bulk Cannabis and Cannabis Products §17398	<ul style="list-style-type: none"> • Adds provisions related to the packaging and labeling of bulk cannabis and cannabis products. 	<ul style="list-style-type: none"> • No change from emergency regulation.
Universal Symbol §17410	<ul style="list-style-type: none"> • Clarifies universal symbol language to align with statutory requirements, which allow vape cartridges to be printed, engraved, or stickered with the universal symbol in black and in a size not smaller than one-quarter inch wide by one-quarter inch high. 	<ul style="list-style-type: none"> • Allows the universal symbol to be in black or white.
Packaging §17411		<ul style="list-style-type: none"> • Removes the requirement that bottles containing liquid products be opaque.
Enforcement §§17800, et seq.	<ul style="list-style-type: none"> • Consolidates and makes consistent enforcement grounds for discipline. • Provides for right of access to enter premises, inspect and test vehicles and equipment, copy records, and test cannabis, cannabis products, and cannabis related materials. States prior notice is not required. • Provides for Notice to Comply, Citation, Embargos, Accusations, Interim Suspensions and Emergency Decisions. • Removes Notice of Violation provisions, except for those issued pre-October 1 and provides for process to transition them to APA hearings. 	<ul style="list-style-type: none"> • §17800 allows service of the Notice to Comply by email. • §17801.5 clarifies embargo provisions.

Section Topic	Emergency Regulations	Adopted Rule
	<ul style="list-style-type: none">• Provides the provisions related to attire, entertainers, conduct, minor decoys, and additional grounds for discipline apply to all licensees.• Incorporates manufacturers into disciplinary guidelines and adds cultivator fine schedule into disciplinary guidelines.• Requires posting of notice of suspension and notice of revocation at the licensed premises.	