
Origins Council Comments on 11/13 CAC Agenda

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 1 attachment (1 MB)

OC Comment for 11.13.25 CAC Meeting.pdf;

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On behalf of Origins Council, please see our attached comments on tomorrow's agenda.

Thank you,

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"The health and vitality of the land its wildlife will be determined by the health and vitality of the communities that dwell on that land." - Wallace Stegner

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Re: Origins Council Public Comment for Cannabis Advisory Committee: Batch Tagging in METRC

Date: November 12, 2025

On behalf of Origins Council, we appreciate the opportunity to comment on tomorrow's CAC agenda item on batch tagging mature cannabis plants in METRC.

For several years, we have strongly supported the removal of the current requirement to tag every plant in METRC. Tagging every plant requires tremendous amounts of labor and generates significant amounts of plastic waste for no discernable regulatory benefit. In 2023, we strongly supported the passage of SB 622 to address this issue, which passed unanimously through the legislature and was signed by the governor in October 2023.

Although SB 622 passed over two years ago, batch tagging was not implemented for the 2024 or 2025 cultivation seasons. Understanding that regulatory promulgation can take six months or longer, we strongly encourage the DCC to move quickly to promulgate regulations for batch or virtual tagging in time for at least a portion of the 2026 cultivation season.

Planting for light deprivation or mixed-light harvests can begin in July or later, providing a window for DCC to implement regulatory changes in time to impact at least part of the 2026 cultivation season if promulgation begins soon and moves quickly.

We appreciate the more detailed questions in the agenda materials and look forward to providing additional feedback soon once we have had time to review them. For tomorrow's meeting, however, we encourage the advisory committee to emphasize the importance of timely regulatory promulgation to ensure that the regulatory benefits of batch or virtual tagging are accessible in 2026.

Sincerely,



Genine Coleman
Executive Director
Origins Council



Hannah Whyte
President
Humboldt County Growers Alliance



Oliver Bates
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