San Jose CA

January, 10th 2022

SCL-22.2 UR.1. Selection Requirements, UR.1.X Cannabis

- *UR.1.X.* Cannabis. The scale division for scales weighing Cannabis shall not exceed:
 - (a) 0.01g for net weighments up to capacity
 - A) 0.01 g
 - (b) 0.1g for net weighments greater than 10g, up to capacity, and
 - (c) 1g for net weighments greater than 100g, up to capacity.

A&D opposes this item completely and recommends that it be withdrawn. The addition of such specific user requirements for a commodity is unprecedented for HB 44. We fail to see the rationale for including readability requirements for Cannabis when such requirements have never been required for gold or other precious metals with a higher dollar per gram value.

If the committee decides that such specifications are warranted, A&D proposes that the requirements be changed to 0.01 g for net weighments up to 100 g capacity. The technology exists and is already in use to not limit the readability to 0.1 g for capacities from 10 g up to 100 g. Having different accuracy requirements for Cannabis consumers who purchase less than 10 g vs. those who purchase more than 10 g is not promoting fairness and equity in the market. The maximum that any state allows for a single user purchase is 2.5 oz (approximately 71 g). By offering 100 g x 0.01 g, the entire range of consumer purchases will be covered equally and consistently.

Example: Deli scales allow the same increment size whether you're getting 1 slice or 10. Cannabis should be no different.

Sincerely,

Evan Foisy – Product Manager Laboratory, Americas