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GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
LANSING

ORLENE HAWKS  
DIRECTOR

June 5, 2020

Sent Via Electronic Mail

Joint Committee on Administrative Rules  
Boji Tower, 3<sup>rd</sup> Floor  
124 West Allegan Street  
PO BOX 30036  
Lansing, Michigan 48909-7536

Subject: Waiver Request

Dear Chairperson Lucido, Alternate Chairperson Maddock, and Committee Members:

As the Executive Director of the Marijuana Regulatory Agency (MRA), I request that the Joint Committee on Administrative Rules (JCAR) waive the remaining session days under the authority provided in the Administrative Procedures Act of 1969, MCL 24.245a(1)(d), for the following companion rule sets:

Marihuana Licenses (MOAHR # 2019-67 LR)  
Marihuana Licensees (MOAHR # 2019-68 LR)  
Marihuana Operations (MOAHR # 2019-69 LR)  
Marihuana Sampling and Testing (MOAHR # 2019-70 LR)  
Marihuana Infused Products and Edible Marihuana Products (MOAHR # 2019-71 LR)  
Marihuana Sale or Transfer (MOAHR # 2019-72 LR)  
Marihuana Employees (MOAHR # 2019-73 LR)  
Marihuana Hearings (MOAHR # 2019-74 LR)  
Marihuana Disciplinary Proceedings (MOAHR # 2019-75 LR)  
Industrial Hemp Rules for Marihuana Businesses (MOAHR # 2019-88 LR)  
Medical Marihuana Facilities – Rescind (MOAHR # 2019-123 LR)

These rule sets provide for the regulation of marihuana businesses, both under the Medical Marihuana Facilities Licensing Act (MMFLA) and the Michigan Regulation and Taxation of Marihuana Act (MRTMA) under a single regulatory scheme that is broken down by topic. The rule sets also provide guidance to marihuana businesses on Industrial Hemp and would rescind the current Medical Marihuana Facilities Administrative Rules.

MARIJUANA REGULATORY AGENCY  
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[www.michigan.gov/MRA](http://www.michigan.gov/MRA)

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There was significant and consistent feedback provided during the public hearing and to the MRA in writing. The MRA has carefully considered all feedback provided in the rule sets that are pending before you.

These rules were presented to JCAR in March of 2020. Two of the rule sets were withdrawn under Section 45a(10)(a) and 45c(2) of the Administrative Procedures Act (APA). Upon submission of the revised rule sets; Marihuana Licensees (MOAHR # 2019-68) and Marihuana Sampling and Testing (MOAHR # 2019-70), the 15-session-day review period was tolled. As such, the MRA respectfully requests JCAR waive the balance of the session days review period.

Sincerely,

Andrew Brisbo  
Executive Director  
517-599-5576

cc: Katherine Wienczewski, Michigan Office of Administrative Hearings and Rules  
Diedre O'Berry, Michigan Office of Administrative Hearings and Rules  
Elizabeth R. Edberg, Legislative Services Bureau  
Timothy D. Reeves, Legislative Services Bureau