



Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

1125 Washington Street SE • PO Box 40100 • Olympia WA 98504-0100

May 6, 2015

Honorable Jane Rushford, Chair
Washington State Liquor Control Board
3000 Pacific Avenue SE
Olympia, Washington 98504

RE: Supplemental CR-102 Regarding Recreational Marijuana Rules

Dear Chair Rushford:

The Office of the Attorney General (“AGO”) appreciates the opportunity to submit these comments on a set of proposed administrative rules by the Washington State Liquor Control Board (“WSLCB”). In particular, we are providing comments on revised proposed amended WAC 314-55-077. On December 3, 2014, the AGO provided comments on the original proposed amended version of this rule. We hereby incorporate by reference those comments and their accompanying attachment.

As we explained in our comments on the original proposed amendments to WAC 314-55-077, products made from usable marijuana and marijuana concentrates are potentially especially appealing to children. Thus, we believe such products, their packaging and labeling should not be categorically excluded from the WSLCB’s authority to review them prior to a processor’s sale of such products to retailers. Further, we believe that the rule should prohibit products made from usable marijuana and marijuana concentrates when such products are especially appealing to children. As proposed, WAC 314-55-077 is limited to marijuana-infused products and their packaging and labeling.

Thank you again for the opportunity to submit these comments.

Sincerely,

DARWIN P. ROBERTS
Deputy Attorney General

DPR/rgp
Enclosures