
Public Comment : Batch Tagging of Mature Cannabis Plants

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To cac@Cannabis <cac@cannabis.ca.gov>

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Cannabis Advisory Committee,

As an outdoor cultivator with close to 100 acres of licensed canopy in Santa Barbara County, we would like to see plant tagging requirements decrease significantly which would assist with reduction of unnecessary labor cost, materials, and plastic waste.

We request the agency consider updating the regulations to one of the following options for batch tagging of mature plants;

Option 1 : all plants of a single strain planted within a 3-day period to receive one plant tag with no maximum number of plants on the tag range.

Option 2 : plants of a single strain in batches of 1000 to be assigned to a single tag.

Tagging is laborious and a huge expense.

The average cost of associated tag processes for a single cultivation & harvest season are as follows;

- Cost of zip ties for \$0.014 per tag, total cost of \$1,232

- Cost of labor to apply tags \$20,000

- Time it takes to apply tags (800 hours to tag) \$88,000

- Time to remove plant tags and clean up all the plastic after a harvest \$3,000

The law still requires a unique identifier per plant, and so each plant in the batch will have an associated UID with the range of UIDs recorded in Metrc. In this manner the DCC can still track harvest size, while reducing the extraordinary use of plastic plant tags and zip ties, as well as the cost of labor savings from not needing to place a tag and zip tie on each plant, and then remove and recycle the plastic tags and ties upon harvest.

Thank you for your consideration,
Staci

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