



TOWN OF LAKEVILLE MEETING POSTING & AGENDA **REMOTE MEETING**

Town Clerk's Time Stamp
received & posted:

LAKEVILLE TOWN CLERK
RCUD 2021 NOV 4 AM9:06

K. Prane

48-hr notice effective
when time stamped

Notice of every meeting of a local public body must be filed and time-stamped with the Town Clerk's Office at least 48 hours prior to such meeting (excluding Saturdays, Sundays and legal holidays) and posted thereafter in accordance with the provisions of the Open Meeting Law, MGL 30A §18-22 (Ch. 28-2009). Such notice shall contain a listing of topics the Chair reasonably anticipates will be discussed at the meeting.

Name of Board or Committee:	Zoning Board of Appeals
Date & Time of Meeting:	Thursday, November 18, 2021 at 7:00 p.m.
Location of Meeting:	REMOTE MEETING
Clerk/Board Member posting notice:	Cathy Murray

Cancelled/Postponed to: _____ (circle one)

Clerk/Board Member Cancelling/Postponing: _____

A G E N D A

1. In accordance with the provisions allowed by Chapter 20 of the Acts of 2021, the **November 18, 2021**, public meeting of the **Zoning Board of Appeals** will be held remotely. However, to view this meeting in progress, please go to facebook.com/LakeCAM (you do not need a Facebook account to view the meeting). This meeting will be recorded and available to be viewed at a later date at <http://www.lakecam.tv/>
2. **Petition hearings (Votes to be taken)**
 - Greene hearing – Shore Avenue-M041-B001-L011**-request for a Variance under 4.0 Use Regulations, 5.0 Intensity Regulations, 6.3.1 Accessory Uses, and 8.2.2 Variances to install a 14' x 20' storage shed on a vacant non-conforming lot.
 - Bud's Goods & Provisions Corp. hearing, continued – 475 Kenneth W. Welch Drive** – request for a Special Permit under 7.4.6 to operate an adult use marijuana establishment as both a marijuana transporter and marijuana product manufacturer.
3. **Approve Meeting Minutes for October 21, 2021**
4. **Old Business**
5. **New Business**
6. **Next meeting. . .Thursday, December 16, 2021**

Please be aware that this agenda is subject to change. If other issues requiring immediate attention of the Zoning Board of Appeals arise after the posting of this agenda, they may be addressed at this meeting.

Read the following into the record:

In accordance with the provisions allowed by Chapter 20 of the Acts of 2021, signed by the Governor on June 16, 2021, the November 18, 2021, public meeting of the **Zoning Board of Appeals** will be held remotely. However, to view this meeting in progress, please go to [facebook.com/lakecam](https://www.facebook.com/lakecam) (you do not need a Facebook account to view the meeting). This meeting will be recorded and available to be viewed at a later date at <http://www.lakecam.tv/>

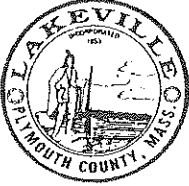
(TOWN OF LAKEVILLE SEAL)

The LAKEVILLE ZONING BOARD OF APPEALS, acting in accordance with MASS GENERAL LAWS CHAPTER 40A, as amended, will conduct a public hearing on Thursday, November 18, 2021, at 7:00 P.M. to hear the petition of **Robert Greene Jr.** A **Variance** under **4.0 Use Regulations, 5.0 Intensity Regulations, 6.3.1 Accessory Uses, and 8.2.2 Variances** is requested to install a 14' x 20' storage shed on a vacant, non-conforming lot. The property site is Shore Avenue, M041-B001-L011.

Pursuant to the provisions allowed by Chapter 20 of the Acts of 2021, signed by the Governor on June 16, 2021, this will be a virtual meeting. The Agenda found on the Town of Lakeville Zoning Board of Appeals web page will include instructions on accessing the virtual meeting and documents related to it.

John Olivieri, Jr., Chairman

November 4, 2021 & November 11, 2021



Town of Lakeville

*Board of Health
346 Bedford Street
Lakeville, MA 02347*

Board of Health
(508) 946-3473
(508) 946-8805
(508) 946-3971 fax

November 10, 2021

Town of Lakeville
Zoning Board of Appeals
Attn: John Olivieri, Chairman
346 Bedford Street
Lakeville, MA 02347

Re: Board of Health comments.

Dear Chairman Olivieri:

We received a copy of the Petition for Hearing for 0 Shore Ave. Since there will be no water connection to the shed, then there will be no need for a septic system. Therefore, the Board of Health has no objections to the proposed storage shed.

If you should have any further questions feel free to contact this office.

Sincerely
For the Board of Health.

Edward Cullen
Health Agent



Town of Lakeville
Conservation Commission
346 Bedford St.
Lakeville, MA 02347

Phone: (508) 946-8823 FAX: (508) 946-0112

To: Zoning Board of Appeals
From: Conservation Commission
Date: November 15, 2021

Subject: 0 Shore Ave, Greene

I have reviewed the petition to construct a 14x20 storage shed at the referenced property. It is my understanding that the lot will be cleared of vegetation prior to construction. Several questions need resolution.

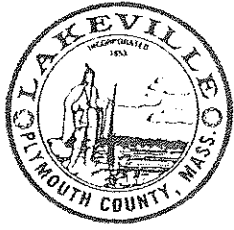
- What type of flooring/foundation is proposed?
- Will the shed be constructed on-site or is it pre-fab?
- What is the distance from the shed to the edge of the pond or small stream?
- How many guest parking spots are proposed?
- Will there be any fencing or tree removal?

Since this location is in the buffer zone and proximate to wetland areas, the Commission may require filing a Request for Determination of Applicability.

Sincerely,

Robert Bouchard

Robert Bouchard
Conservation Agent



Town of Lakeville

PLANNING BOARD
346 Bedford Street
Lakeville, MA 02347
508-946-8803

Mark Knox, Chairman
Peter Conroy, Vice Chairman
Jack Lynch
Michele MacEachern
Barbara Mancovsky,

MEMORANDUM

TO: Board of Appeals

FROM: Planning Board

DATE: November 15, 2021

SUBJECT: Petition Review for Greene – 0 Shore Avenue-M041-B001-L011

At their Thursday, November 4, 2021, meeting, the Planning Board reviewed the above referenced Petition for Hearing from the Board of Appeals. The Board had no comments regarding this petition.

Petition to be
filed with Town Clerk

EXHIBIT "A"

TOWN OF LAKEVILLE
MASSACHUSETTS

ZONING BOARD OF APPEALS
PETITION FOR HEARING

Name of Petitioner: ROBERT GREENE JR

Mailing Address: 73 PARKLANE ROAD

Name of Property Owner: ROBERT GREENE JR

Location of Property: 0 SHORE AVENUE

Property is located in a residential business industrial (zone)

Registry of Deeds: Book No. 3131 Page No. 218

Map 041 Block 001 Lot 011

Petitioner is: owner tenant licensee prospective purchaser

Nature of Relief Sought:

Special Permit under Section (s) _____ of the Zoning Bylaws

Variance from Section (s) _____ of the Zoning Bylaws.

Appeal from Decision of the Building Inspector/Zoning Enforcement Officer

8/23/21 Date of Denial

Brief to the Board: (See instructions on reverse side -- use additional paper if necessary.)
SEE ATTACHED LETTER

I HEREBY REQUEST A HEARING BEFORE THE ZONING BOARD OF APPEALS WITH REFERENCE TO THE ABOVE PETITION OR APPEAL. ALL OF THE INFORMATION ON THIS PETITION, TO THE BEST OF MY KNOWLEDGE, IS COMPLETE AND ACCURATE AND CONFORMS TO THE REQUIREMENTS ON THE BACK OF THIS PETITION FORM.

Petitioner: ROBERT GREENE JR

Date: 8/24/21

Signed: [Signature]

Telephone: 603-475-4690

Owner Signature: SAME
(If not petitioner)

Owner Telephone: SAME

(REFERENCE THE REVERSE SIDE OF THIS APPLICATION FOR FURTHER INSTRUCTIONS IN FILING YOUR PETITION.)

WILL YOU HAVE A REPRESENTATIVE OTHER THAN YOURSELF?

Yes No

(Name and Title)

RECEIVED
OCT 18 2021
BOARD OF APPEALS

Robert Greene Jr.
P.O. Box 630
Derry, NH 03038

March 29, 2021

Clark Shores Association,
P.O. Box 1083
Lakeville, MA 02347

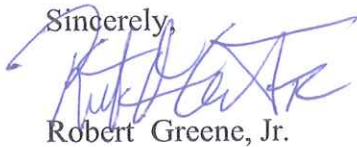
To the Clark Shores Association BOD,

Hi, my name is Bob Greene Jr and I own the small, vacant parcel of land @ 0 Shore Avenue. 0 Shore Ave is sandwiched between 28 Shore Ave and 34 Shore Ave. If my name sounds familiar it is because my parents owned a cottage on Island Road from the early 1960's through the mid 1970's. My dad, Bob Greene senior, was very active in the Buena Vista Shores community and was a past BOD member. In the mid 1960's my father purchased the 0 Shore Ave vacant lot, along with an Island Road neighbor, for the purpose of docking their boats on Hathaway Brook for the summer. After the neighbor and my father sold their cottages on Island Road my father continued to pay the taxes until 1980 on Shore Avenue. In 1980 I bought the lot from my father as he was tired of paying the taxes and not using the lot. For the last 40 years I have paid the taxes on the lot and checked in with my neighbor Al Morris to make sure some of the unsavory characters on the Shore Ave peninsula were not totally trashing the lot, in exchange, I let Al clear some brush and use the street side of the lot for storage.

As I approach retirement, my fiancée and I would like to take day trips to Lakeville and spend time on the beautiful body of water that is Long Pond. We have started to remove the trash, brush, etc. from the lot and have met a lot of the new neighbors. They all seem excited about the rebirth of this lot and about my fiancée and I joining the neighborhood, albeit on a limited basis. We are also very excited after meeting the neighbors, as there is a real positive energy on the Shore Ave peninsula and we are eager to join in. As such, we are submitting the attached drawings for your review and approval. Our desire is to erect a storage shed on the front ½ of the lot and leave the back ½ of the lot undisturbed. The storage shed will house our kayaks, wave runners, gear, landscaping equipment, etc. I wanted to obtain neighborhood and BOD approval for the shed prior to submitting to the Lakeville Building Department. We have no intention of spending more than a couple of weekends per summer at the lot as we have year-round properties in other locations. I have many positive memories of Buena Vista Shores from my youth, and I look forward to making more great memories in Clark Shores in the future. In anticipation of getting a favorable review from the Clark Shores Association BOD, I have enclosed a check in the amount of \$ 200.00 for my yearly HOA fee and a check for \$ 20.00 for the boat ramp fee. My cell phone # is 603-475-4690 and I am available anytime to discuss this matter.

Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Greene, Jr.", written in a cursive style.

Robert Greene, Jr.

Robert Greene Jr.
73 Parklane Road
Hampstead, NH 03841

October 4, 2021

Town of Lakeville
Zoning Board of Appeals

To whom it may concern

I respectfully request a zoning variance to install a 14'x 20' storage shed on a vacant non-conforming lot at 0 Shore Avenue for the following reasons.

- The abutters approve of this project. I have shown our plans to the abutters and to the Shore Ave neighbors and they are excited to see this longtime vacant lot cleaned up and a quality storage structure being placed on this property.
- The Clark Shores Association approves this project. I have submitted the plans to the Clark Shores BOD and they took no exception to this project other than to state that I needed to submit the plans to the Lakeville Building Department and follow proper building department procedures.
- The Town of Lakeville will benefit from this project The tax bill will increase but the Town will not see any cost impact as this site will never support any structure other than a small storage shed.
- The structure will fit in with the neighborhood. The Clark Shore Community has approximately 300 homes, 90%, or more of which don't comply with the current Town of Lakeville setback and acreage requirements.
- The proposed storage shed will be constructed by a local shed builder (Statewide sheds) and my fiancée will be planting flowers and landscaping the grounds. Our lot will have curb appeal and will add to the value of the community.
- The Clark Shores roadways are narrow and difficult to navigate by emergency responders, especially during the summer months with guests parking on the streets. We have already spoken with some of our neighbors on Shore Ave and given them permission to use our lot for guest parking.

My history with Buena Vista Shores / Clark Shores dates back to the 1960's when the Greene family spent our summers on Island Road. As I approach my retirement next March my fiancée and I are excited about coming to Lakeville for a few weekends during the summer and kayaking the lake or splashing our waverunner on the lake. We have no intention of using this lot for more than a couple of times a year as we have homes in several vacation areas. Having a storage shed on this lot will allow us to secure our toys and landscaping equipment. The Shore Ave peninsula has seen an influx of new owners who are

investing heavily in their homes and upgrading the neighborhood, my fiancée and I are eager to join in and do our part.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert F. Greene, Jr.", with a large, sweeping flourish above the name.

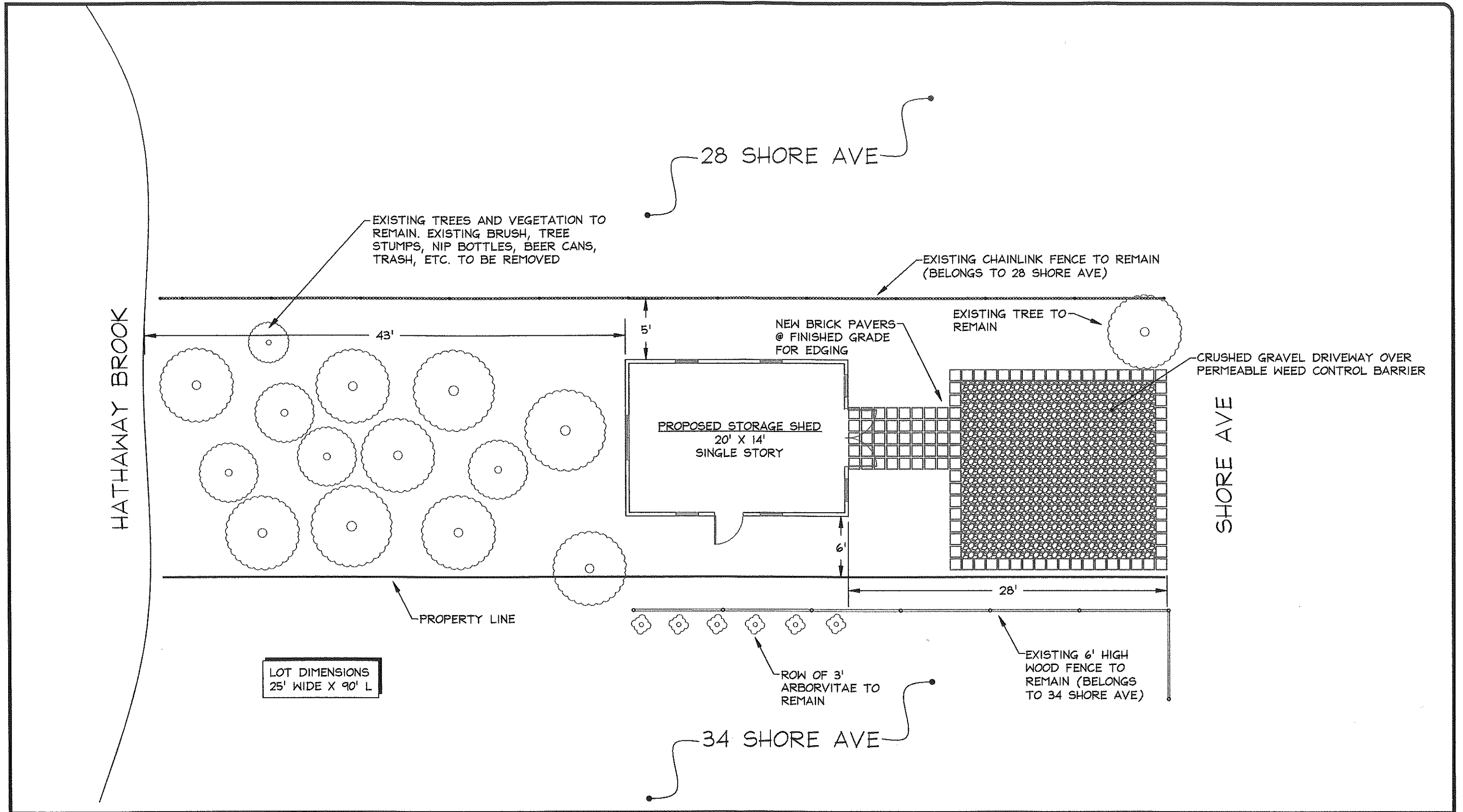
Robert F. Greene, Jr.



0 Shore Ave
CLARK SHORES ASSOCIATION
LAKEVILLE, MASS

Title
GOOGLE EARTH SITE
PLAN

Drawn: SAS	Scale: N.T.S.
Date: 09/30/21	Project No: --
Drawing No: S1.1	



0 Shore Ave
CLARK SHORES ASSOCIATION
 LAKEVILLE, MASS

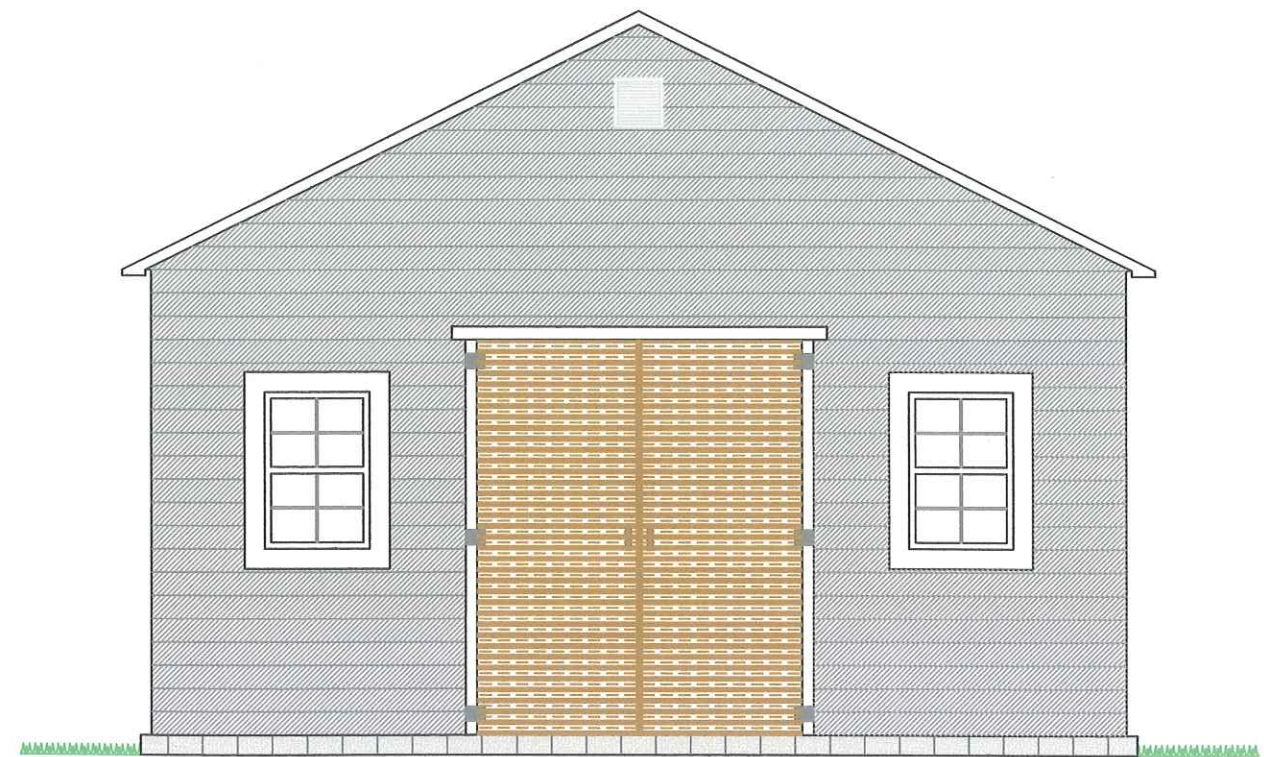
Title

SITE PLAN

Drawn: SAS	Scale: 1/8"=1'-0"
Date: 09/30/21	Project No: --
Drawing No: S1.2	



REAR ELEVATION (FACING HATHAWAY BROOK)
Scale: 3/8"=1'-0"



FRONT ELEVATION (FACING SHORE AVE)
Scale: 3/8"=1'-0"

0 Shore Ave
CLARK SHORES ASSOCIATION
LAKEVILLE, MASS

Title
ARCHITECTURAL
ELEVATIONS

Drawn: SAS	Scale: 3/8"=1'-0"
Date: 09/30/21	Project No: --
Drawing No: A1.1	

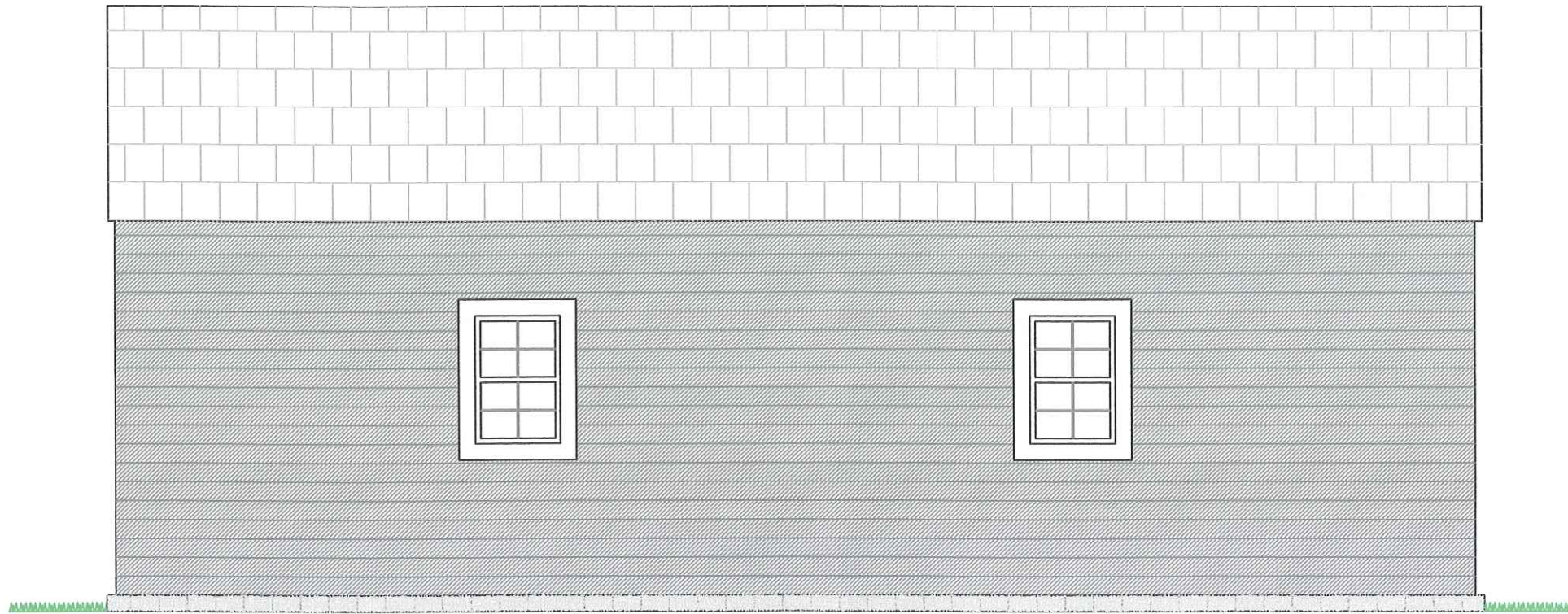


SIDE ELEVATION (FACING 30 SHORE AVE)
Scale: 3/8"=1'-0"

0 Shore Ave
CLARK SHORES ASSOCIATION
LAKEVILLE, MASS

Title
ARCHITECTURAL SIDE
ELEVATIONS

Drawn: SAS	Scale: 3/8"=1'-0"
Date: 09/30/21	Project No: --
Drawing No: A1.2	



SIDE ELEVATION
Scale: 3/8"=1'-0"

0 Shore Ave
CLARK SHORES ASSOCIATION
LAKEVILLE, MASS

Title
ARCHIECTURAL SIDE
ELEVATIONS

Drawn: SAS	Scale: 3/8"=1'-0"
Date: 09/30/21	Project No: --
Drawing No: A1.3	

(TOWN OF LAKEVILLE SEAL)

The LAKEVILLE ZONING BOARD OF APPEALS, acting in accordance with MASS GENERAL LAWS CHAPTER 40A, as amended, will conduct a public hearing on Thursday, October 21, 2021, at 7:00 P.M. to hear the petition of **Bud's Goods & Provision Corp.** A **Special Permit** under 7.4.6 is requested to operate an adult use marijuana establishment as a marijuana product manufacturer and a marijuana transporter at **475 Kenneth W. Welch Drive**, as provided by the Lakeville By-Laws. The property site is owned by **Green Peak LLC**.

Pursuant to the provisions allowed by Chapter 20 of the Acts of 2021, signed by the Governor on June 16, 2021, this will be a virtual meeting. The Agenda found on the Town of Lakeville Zoning Board of Appeals web page will include instructions on accessing the virtual meeting and documents related to it.

John Olivieri, Jr., Chairman

October 7, 2021 & October 14, 2021



Town of Lakeville

*Board of Health
346 Bedford Street
Lakeville, MA 02347*

Board of Health
(508) 946-3473
(508) 946-8805
(508) 946-3971 fax

October 20, 2021

Town of Lakeville
Zoning Board of Appeals
Attn: John Olivieri, Chairman
346 Bedford Street
Lakeville, MA 02347

Re: Board of Health comments.

Dear Chairman Olivieri:

We received a copy of the Petition for Hearing for 475 Kenneth Welch Drive. The petition states on page 14 that "this permit application would not necessitate modifications to the existing utilities provided as part of building infrastructure". This is incorrect, because the lot was approved for a new septic system on 9/12/18, but the system was never installed and that approval has expired. The applicant will be required to resubmit septic plans for approval and install the system prior to occupancy of the building. The Board of Health has no objections to the proposed use, providing a new septic plan is submitted and installed prior to occupancy.

If you should have any further questions feel free to contact this office.

Sincerely
For the Board of Health

Edward Cullen
Health Agent

ZBA

Cathy Murray, Appeals Board Clerk

From: Bob <rjbouchard@verizon.net>
Sent: Monday, October 18, 2021 11:02 AM
To: Cathy Murray, Appeals Board Clerk
Subject: Re: Site Plan Review-475 Kenneth W. Welch Drive

To: Board of Appeals

From: Conservation Commission

Date: October 18, 2018

Subject: Kenneth Welch Drive

I have reviewed the application for a hearing on the referenced property. An inspection of the site has revealed wetland areas on 3 sides of the existing building. Construction activities were also observed in the parking area on the eastern side. It is my understanding that construction is proposed for the interior only.

No action will be required as long as construction activity is limited to the interior of the building. Outdoor construction and storage of materials in the buffer zone may require an RDA.

Bob Bouchard
Conservation Agent

-----Original Message-----

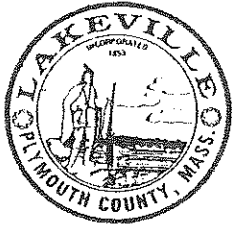
From: Cathy Murray, Appeals Board Clerk <cmurray@lakevillema.org>
To: Edward Cullen <ecullen@lakevillema.org>; Tracie Craig-McGee <tcraig-mcgee@lakevillema.org>; Nathan Darling, Building Commissioner & Zoning Enforcement Officer <ndarling@lakevillema.org>; Bob <rjbouchard@verizon.net>; Michael P. O'Brien, Fire Chief <mobrien@lakevillema.org>; Franklin Moniz, DPW Director <fmoniz@lakevillema.org>; Matthew Perkins, Lakeville Chief of Police <mperkins@lakevillema.org>; Adam Young <adamyounghd@gmail.com>
Cc: Frances Lawrence, Part time Board of Health Clerk <flawrence@lakevillema.org>; Lori Canedy <lcanedy@lakevillema.org>; Pamela Garant, Fire Deputy Chief <pgarant@lakevillema.org>; Jennifer Jewell, DPW - Administrative Assistant <jjewell@lakevillema.org>; Kristen Campbell, Administrative Assistant, Lakeville Police Department <kcampbell@lakevillema.org>
Sent: Wed, Oct 13, 2021 2:45 pm
Subject: Site Plan Review-475 Kenneth W. Welch Drive

Hi everyone,

Attached please find the application and Site Plan for 475 Kenneth W. Welch Drive that has been submitted to the Planning Board. Previously, a different applicant had submitted an application for this same address. Some changes had been requested by some Departments. If you had requested a change and do not see it on this Site Plan, please let me know and I will forward that information on to the applicant.

Thanks you!

Cathy



Town of Lakeville

PLANNING BOARD
346 Bedford Street
Lakeville, MA 02347
508-946-8803

Mark Knox, Chairman
Peter Conroy, Vice Chairman
Jack Lynch
Michele MacEachern
Barbara Mancovsky

MEMORANDUM

TO: Board of Appeals

FROM: Planning Board

DATE: November 15, 2021

SUBJECT: Petition Review for Bud's Goods & Provisions Corp. –
475 Kenneth W. Welch Drive

At their Thursday, October 14, 2021, meeting, the Planning Board reviewed the above referenced Petition for Hearing from the Board of Appeals. The Board recommends that the applicant have suitable containment for the loading of a vehicle, whether it be inside the building in a garage bay or outside the building in a fenced area as long as it can be done safely and securely.

SETTLEMENT AND RELEASE AGREEMENT

This Settlement and Release Agreement (this "Agreement") is entered into this 31st day of August, 2021 (the "Execution Date"), by and between Boston Botanical, Inc., a Massachusetts corporation ("Botanical") and Bud's Goods & Provisions Corp. (f/k/a Trichome Health Corp.), a Massachusetts corporation ("Bud's"). The above parties are collectively referred to herein as the "Parties" and singularly as a "Party."

RECITALS:

WHEREAS, the Parties entered into an Asset Purchase Agreement dated November 9, 2020 (the "APA") pursuant to which Botanical agreed to purchase certain assets of Bud's defined in the APA as the "Purchased Assets," including, without limitation, rights to certain adult use cultivation and manufacturing licenses issued to Bud's for the premises known as 475 Kenneth Welch Drive, Lakeville, Massachusetts (the "Premises"), as well as Bud's rights as purchaser under a Purchase and Sale Agreement with respect to the Premises. Capitalized terms used but not defined herein shall have the meanings ascribed thereto in the APA; and

WHEREAS, pursuant to the APA, Botanical made a Deposit in the amount of \$100,000 which is being held by Burns & Levinson LLP (the "Escrow Agent"), pursuant to the terms of the Escrow Agreement dated November 9, 2020 by and among the Parties and the Escrow Agent (the "Escrow Agreement"); and

WHEREAS, Botanical failed to close on the Closing Date as provided in the APA and was therefore in default under the APA and in breach of the APA; and

WHEREAS, as a result of Botanical's breach, Bud's exercised its right to terminate the APA and asserted its right to the Escrow Fund (as defined in the Escrow Agreement) and to recover damages pursuant to the indemnification provisions of the APA (collectively, the "Damage Claims"); and

WHEREAS, in order to avoid the expense and uncertainty of litigation, the Parties have determined that is in their best interests to resolve their disputes over the Damage Claims by the execution of this Agreement.

NOW, THEREFORE, for good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties agree as follows:

1. Recitals. The Recitals above are accurate and incorporated herein by this reference.
2. Authorization of the Distribution of the Escrow Fund. Botanical acknowledges that the APA has been terminated. The Parties authorize and instruct the Escrow Agent to release and disburse the Escrow Fund to Bud's. Botanical forever disclaims any rights or claims to the Escrow Fund. The Parties acknowledge that upon such

disbursement of the Escrow Funds, the Escrow Agent shall have performed all of its duties under the Escrow Agreement and shall be released from any liability thereunder.

3. Compensatory Damages. Bud's hereby agrees that the disbursement to and retention by it of the Escrow Fund shall be deemed compensatory damages allowing Bud's to recover some but not all of the expenses it has incurred in connection with the transaction that was the subject of the APA and Bud's agrees to waive any further right or remedy for Botanical's breach of the APA at law or in equity, except for such additional obligations as are set forth in this Agreement.
4. Release of Botanical. Subject to the disbursement of the Escrow Fund to Bud's, and except as to any obligations arising out of this Agreement, Bud's, for itself and its officers, directors, shareholders and affiliates (collectively, the "Bud's Releasers") hereby remises, releases and forever discharges Botanical, its officers, directors, shareholders, employees, agents, brokers, representatives, attorneys and affiliates (collectively, the "Botanical Releasees"), from any and all claims, actions, damages, causes of action, appeals, costs, attorneys' fees and expenses, and any and every other claim of every kind, nature and description whatsoever, whether known, unknown, or unknowable, both in law and equity, from the beginning of the world to the Execution Date, which the Bud's Releasers or any of them now have or ever had against the Botanical Releasees or any of them, including, without limitation, matters arising out of, related to, resulting from or in connection with the APA, the Purchased Assets, the Damage Claims, and the Escrow Agreement.
5. Release of Bud's. Except as to any obligations arising out of this Agreement, Botanical, for itself and its officers, directors, shareholders and affiliates (collectively, the "Botanical Releasers") hereby remises, releases and forever discharges Bud's, its officers, directors, shareholders, employees, agents, brokers, representatives, attorneys and affiliates (collectively, the "Bud's Releasees"), from any and all claims, actions, damages, causes of action, appeals, costs, attorneys' fees and expenses, and any and every other claim of every kind, nature and description whatsoever, whether known, unknown, or unknowable, both in law and equity, from the beginning of the world to the Execution Date, which the Botanical Releasers or any of them now have or ever had against the Bud's Releasees or any of them, including, but not limited to, matters arising out of, related to, resulting from, or in connection with the APA, the Purchased Assets, the Damage Claims, and the Escrow Agreement.
6. Breach of this Agreement. Each Party agrees that it shall be liable for all costs and expenses (including, without limitation, attorneys' fees and expenses) incurred by the other Party in enforcing the terms and provisions of this Agreement, to the extent such other Party prevails.
7. Binding Effect. This Agreement shall only become effective and binding upon the execution and delivery of this Agreement by all of the Parties, at which time, this

Agreement shall be binding upon and inure to the benefit of the Parties and their respective successors and assigns.

8. Counterparts. This Agreement may be signed in multiple originals and/or may be separately signed and assembled to contain the signatures of all the parties, with each counterpart constituting an original document. A signed counterpart of this Agreement sent by electronic transmission, including, without limitation, as a pdf by email, shall be deemed an original and legally binding on the Party signing and shall have the effect of an original, executed instrument.
9. Representations. Each Party to this Agreement represents that it has been represented by counsel of its own selection with respect to the execution of this Agreement. Each Party further represents that it has read this Agreement in its entirety and fully understands all the provisions of this Agreement, and that it is voluntarily entering into this Agreement after consultation with counsel. The Parties further represent that in executing this Agreement they do not rely upon any promise, inducement, or representation made by the other Party or its agents, representatives, or attorneys with regard to the basis, operation, or effect of this Agreement.
10. Entire Agreement. This Agreement shall constitute the entire agreement between the Parties and any prior understanding or representation of any kind preceding the date of this Agreement shall not be binding upon either Party except to the extent incorporated in this Agreement.
11. Modification of Agreement. Any modification of this Agreement or additional obligation assumed by either Party in connection with this Agreement shall be binding only if made in a writing signed by each Party or an authorized representative of each Party.
12. Authority. The individuals executing this Agreement on behalf a Party represent and warrant to the other Parties that such person has authority to execute this Agreement on behalf of and to bind such Party to the terms and provisions of this Agreement and that this Agreement constitutes the legal, valid and binding obligations of such Party, its heirs, representatives, successors and assigns, enforceable against such Party or Parties in accordance with its terms.
13. Disclaimer of Rights. The Botanical Releasors hereby irrevocably and unconditionally disclaim and waive any right, title or interest it or they may have in any Approvals, Local Approvals or any other licenses, approvals, or permits or any kind or nature issued to any of them by any governmental agency in connection with or related to the Premises, including, without limitation, any host agreement entered into with the Lakeville Board of Selectmen, any conditional approval issued by the Massachusetts Cannabis Control Commission, and any Special Permit issued by the Lakeville Zoning Board of Appeals and agrees to promptly execute and deliver any and all assignments or disclaimers with respect thereto as may be requested by Bud's.

14. Further Assurances. The Parties hereby agree to execute any and all documents reasonably requested by the other to confirm or otherwise effectuate the terms and provisions contained in this Agreement.

[SIGNATURES APPEAR ON THE FOLLOWING PAGE]

EXECUTED as a sealed instrument as of the Execution Date.

Boston Botanical, Inc.

By: Edward Phipps
Edward Phipps, President and
Individually

By: Jeffrey W. Upton
Jeffrey W. Upton, Treasurer and
Individually

Bud's Goods & Provisions Corp.

By: _____
Alexander Mazin, President and
Treasurer and Individually

EXECUTED as a sealed instrument as of the Execution Date.

Boston Botanical, Inc.

By: _____
Edward Phipps, President and
Individually

By: Jeffrey Upton
Jeffrey Upton, Treasurer and
Individually

Bud's Goods & Provisions Corp.

By: Alex Mazin
Alexander Mazin, President and
Treasurer and Individually



EXHIBIT "A"

Town of Lakeville
Zoning Board of Appeals
346 Bedford Street
Lakeville, MA 02347
508-946-3473

Special Permit Application
Petition for hearing
Marijuana Uses only

Name of Petitioner: Bud's Goods & Provisions Corp.

Mailing Address: 54 West Boylston Street, Worcester, MA 01606

Name of Property Owner: Green Peak LLC

Location of Property: 475 Kenneth W. Welch Drive

Registry of Deeds: Book No. 9460 Page No. 18

Map 24 Block 006 Lot 008

Petitioner is: owner tenant licensee prospective purchaser

Marijuana Use(s) applying for:

- Marijuana Retailer
 - Marijuana Research Facility
 - Independent Testing Laboratory
 - Marijuana Cultivator
 - Registered Marijuana Dispensary (RMD)
 - Craft Marijuana Cooperative
 - Marijuana Product Manufacturer
 - Craft Marijuana Cooperative
 - Marijuana Transporter
 - Microbusiness
- *(Must also complete Tiers of Marijuana Cultivator)

Tiers of Marijuana Cultivator

Each licensee (except a Craft Marijuana Cooperative) may have three licenses, but the total canopy authorized by the licenses added together may not exceed 100,000 square feet.

Please indicate all Tiers that are licensed (L) or are in process (✓) from the Cannabis Control Commission.

- Tier 1-up to 5,000 square feet
- Tier 2-5,001 to 10,000 sq. ft.
- Tier 3-10,001 to 20,000 sq. ft.
- Tier 4-20,001 to 30,000 sq. ft.
- Tier 5-30,001 to 40,000 sq. ft.
- Tier 6-40,001 to 50,000 sq. ft.
- Tier 7-50,001 to 60,000 sq. ft.
- Tier 8-60,001 to 70,000 sq. ft.
- Tier 9-70,001 to 80,000 sq. ft.
- Tier 10-80,001 to 90,000 sq. ft.
- Tier 11-90,001 to 100,000 sq. ft.

Please include a brief to the Board along with all documents required from the attached Special Permit Checklist with your application. Use additional paper if necessary.

Please see the enclosed narrative.

I HEREBY REQUEST A HEARING BEFORE THE ZONING BOARD OF APPEALS WITH REFERENCE TO THE ABOVE PETITION. ALL OF THE INFORMATION ON THIS PETITION, TO THE BEST OF MY KNOWLEDGE, IS COMPLETE AND ACCURATE AND CONFORMS TO THE REQUIREMENTS OF THE MARIJUANA USES SUBMITTAL CHECKLIST AND THE TOWN OF LAKEVILLE ZONING BY-LAW.

Petitioner: Bud's Goods & Provisions Corp., by Alex Mazin, President & Director

Date: August 19, 2021

Signed: *Alex Mazin*

Telephone: 774-239-2200

Email: alex@budsgoods.com

Owner Signature: *Alex Mazin*
(If not petitioner)

Owner Telephone: 774-239-2200

WILL YOU HAVE A REPRESENTATIVE OTHER THAN YOURSELF?

Yes No

Phil Silverman, Counsel, Vicente Sederberg LLP

(Name and Title)



Town of Lakeville
Zoning Board of Appeals
346 Bedford Street
Lakeville, MA 02347
508-946-3473

SPECIAL PERMIT APPLICATION FOR ALL MARIJUANA USES SUBMITTAL CHECKLIST

Please use this Checklist when assembling your Application.

If you need additional information related to Special Permits and/or Marijuana Uses please consult the Zoning By-Law for the Town of Lakeville located on the Town's Website at www.lakevillema.org, Section 7.4.

- Application must be filled out completely and accurately. Please include the original and 20 copies of all requested paperwork.
- A check in the amount \$240.00 made payable to the Town of Lakeville for the filing fee and a check in the amount \$120.76 made payable to Southcoast Media Group for the legal ad fee. It will also be the responsibility of the applicant to pay any required additional charges. These include, but are not limited to peer review, consultant fees, or legal fees.
- One (1) PDF digital copy of the complete application submitted on a flash drive or via email to cmurray@lakevillema.org.
- A completed, signed Notice to Tax Collector Form. Treasurer's signature is required to ensure all Taxes are paid up to date on the subject property.
- An abutter's list certified by the Lakeville Assessor's office listing all interested parties within 300 feet of the subject property.
- A detailed floor plan of the proposed Marijuana Use that identifies the square footage available and describes the functional areas of the facility;
- 21 copies of detailed Site Plans that have been endorsed and signed by the Lakeville Planning Board. At least two sets of these plans must be full size.
- A copy of the Written Operating Procedures as required by 935:500.105 and/or 935CMR501:105 which shall include, at a minimum, the following:
 - a. Security measures in compliance with 935 CMR 500.110 and/or 935CMR501.110 to the extent such information may be made publicly available;
 - b. Employee security policies;
 - c. Proposed hours of operation and after-hours contact information;
 - d. Proposal for storage of marijuana;

- e. Emergency procedures, including a disaster plan in case of fire or other emergencies;
- f. Policies and procedures for preventing the diversion of marijuana to individuals younger than 21 years old;
- g. Policies and procedures for energy efficiency and conservation in accordance with 935 CMR 500.105, and a plan for implementation of such policies;
- A copy of the proposed waste disposal procedures.
- A copy of the Host Community Agreement (HCA) signed by the Lakeville Board of Selectmen.

Deficient or incomplete filings could result in a delay for a hearing.

Zoning Board of Appeals Staff Signature

Date

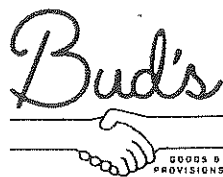


Table of Contents

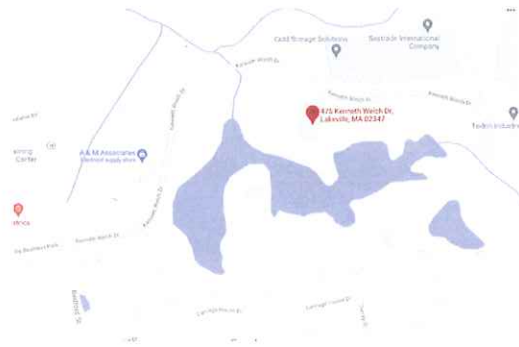
Project Narrative	9
Exhibit A: Site and Floor Plans	18
Exhibit B: Standard Operating Procedures	24
Exhibit C: Employee Security	59
Exhibit D: Storage	62
Exhibit E: Emergency Protocol	63
Exhibit F: Prevention of Diversion	74
Notice to Tax Collector	76
Abutter's List	77
Security Plan	81
Host Community Agreement	100



Bud's Goods & Provisions Corp. ("**Bud's Goods**"), seeks a Special Permit from the Lakeville Zoning Board of Appeals and Site Plan Review Approval from the Lakeville Planning Board to operate an Adult Use Marijuana Product Manufacturing and Transporter Facility (the "**ME**") at 475 Kenneth Welch Drive in Lakeville (the "**Property**"). The Property is located within the Industrial Zoning District within the Marijuana Zoning Overlay. Pursuant to the Town of Lakeville Zoning Bylaw Section 7.4.6, such a use is permissible subject to a Special Permit from the Zoning Board of Appeals.

I. Project Context

The Property is currently a vacant 20,000 square foot industrial building that is located along Kenneth Welch Drive in close proximity to its intersection with Bedford Street. Bud's Goods anticipates interior renovations to allow for the operation of a 6,747 square foot ME within the existing premises. Please see the enclosed Site Plans and Floor Plans, attached hereto as **Exhibit A**, which were designed in full compliance with the standards set forth by the Lakeville Zoning Bylaw.



Map View of Property and Surroundings

II. Project Narrative

With a focus on safe and efficient operations, Bud's Goods has identified the Property as an ideal location at which to operate an ME. The Property is located in an area designated by local zoning for the aforementioned use, allows for easy access employees off of a main road, and is located proximate to a number of other industrial parcels with similar use classifications.

A. Project Exterior

Parking & Loading: Access to the Property may be obtained by a curb cut off of Kenneth Welch Drive towards the southern property line. A total of 23 parking spaces are available on site.

Marijuana and marijuana products will be securely transported to and from other Marijuana Establishments utilizing a secure shipping and receiving area as well as standard operating procedures consistent with Cannabis Control Commission's regulations and in a manner approved by the Commission following review of such procedures and an on-site inspection to ensure site security. Similarly to other area retail uses, the ME will utilized armored cash transport to securely transport money to financial institutions.

Signage and Lighting: Facility signage will be discrete and utilized for employee and vendor wayfinding only. Bud's Goods will not utilize signs or printed materials advertising marijuana products or any logo or symbols with images of marijuana.

The applicant intends to utilize the existing lighting that affixed to the building and intended to illuminate the parking lot to ensure the safety of employees leaving the facility during evening hours. The lights are downward cast and do not result in light pollution to abutting properties. The exterior security cameras utilize infrared capabilities and do not require external sources of light to operate effectively.

B. Project Interior

No members of the public will be granted access to Bud's Goods' ME. Employees, vendors, and visitors will be required to check in with security upon entry to the establishment. Employees will be required to provide their Agent ID card and other access badges which will grant them the ability to traverse only such portions of the facility that are necessary for their job function. Visitors such as contractors or vendors may only visit the facility for legitimate reasons and must obtain temporary badging and be escorted by a registered agent at all times.

C. Facility Operations

Please see the enclosed operational narratives, attached hereto as **Exhibit B**.

III. Property Operations

A. Trash

Marijuana Waste: No usable marijuana waste will be stored in the exterior of the site. All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

Liquid waste containing marijuana or by-products of marijuana processing will be disposed of in compliance with all applicable state and federal requirements, including but not limited to, for discharge of pollutants into surface water or groundwater (Massachusetts Clean Waters Act, M.G.L. c. 21 §§ 26 through 53; 314 CMR 3.00: *Surface Water Discharge Permit Program*; 314 CMR 5.00: *Groundwater Discharge Program*; 314 CMR 12.00: *Operation Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Dischargers*; the Federal Clean Water Act, 33 U.S.C. 1251 *et seq.*, the National Pollutant Discharge Elimination System Permit Regulations at 40 CFR Part 122, 314 CMR 7.00: *Sewer System Extension and Connection Permit Program*), or stored pending disposal in an industrial wastewater holding tank in accordance with 314 CMR 18.00: *Industrial Wastewater Holding Tanks and Containers Construction, Operation, and Record Keeping Requirements*.

Organic material and recyclable material will be redirected from disposal in accordance with the waste disposal bans described at 310 CMR 19.017: *Waste Bans*. To the greatest extent feasible,

any recyclable material as defined in 310 CMR 16.02: *Definitions* will be recycled in a manner approved by the Commission and any remaining marijuana waste will be ground and mixed with other organic material as defined in 310 CMR 16.02: *Definitions* such that the resulting mixture renders the marijuana unusable for its original purpose. Once such marijuana waste has been rendered unusable, the mixture may be composted or digested at an aerobic or anaerobic digester at an operation that is in compliance with the requirements of 310 CMR 16.00: *Site Assignment Regulations for Solid Waste Facilities*.

Solid waste containing marijuana may be ground up and mixed with other solid waste such that the resulting mixture renders any marijuana unusable for its original purpose. Once such marijuana has been rendered unusable, the resulting solid waste may be brought to a solid waste transfer facility or a solid waste disposal facility (e.g., landfill or incinerator) that holds a valid permit issued by the Department of Environmental Protection or by the appropriate state agency in the state in which the facility is located.

No fewer than two agents will witness and document how the solid waste or organic material containing marijuana is handled on-site, including, but not limited to, the grinding up, mixing, storage and removal from the facility in accordance with 935 CMR 500.105(12). When marijuana products or waste is disposed or handled, the company will create and maintain a written or electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two agents present during the disposal or other handling, with their signatures. Bud's Goods will keep these records for at least three years.

Non-Marijuana Waste: Waste that does not contain marijuana will be stored in an exterior dumpster and picked up weekly by a commercial trash vendor. Although no marijuana will be present in this dumpster, it will remain locked until such time that the commercial trash pick up occurs.

B. Snow Removal

Snow removal will follow existing practices utilized by the property owner.

C. Loading

Product deliveries will leave from the facility on a regular basis in unmarked transport vans. Pursuant to 935 CMR 500.105, there will be no advertising, markings, or branding indicating that the vehicle is being used to transport marijuana. Routes and times used for the transportation of marijuana and marijuana products are randomized. Marijuana and marijuana products will be transported in secure, locked storage compartments that are a part of the vehicle transporting the marijuana products and cannot be easily removed. At least two agents will staff vehicles transporting marijuana. One agent will remain in the vehicle at all times, and the other will be accompanied by a staff member into the facility and through the receiving area.

An armored car service will pick up monetary instruments as needed each week.

D. Traffic and Parking

With 23 dedicated parking spaces located on site, Bud's Goods respectfully submits that there is ample parking to accommodate its employees and delivery vehicles. Bud's Goods anticipates hiring 25 employees, with a maximum of 12 on site at any given time. The company will take great care to develop, implement, and refine operational procedures that ensure that shifts overlap and will not result in congestion within the parking lot or the store. Operational procedures will be continually evaluated and adjusted as necessary to ensure optimal function of the facility.

The company respectfully submits that its proposed use of the Property will not disturb the existing right of way, pedestrian access, and will not cause a hazard to vehicle or pedestrian traffic. Traffic generated and patterns of access and egress will not cause congestion, hazard, or a substantial change to the neighborhood character.

E. Odor

Please see the enclosed Odor Control Plan, attached hereto as **Exhibit C**.

IV. Compliance with Town of Lakeville Zoning Bylaw Section 7.4.6

- A. Section 7.4.6(B): Marijuana Uses shall not be located within 500 feet of a public or private school providing education in kindergarten or grades 1 through 12.**

The proposed ME is not located within 500 feet of a public or private school providing education in kindergarten or grades 1 through 12.

- B. Section 7.4.6(D): Marijuana Uses shall be located only in a permanent building and not within any mobile facility, with the exception of the transporting of marijuana and marijuana products under a Marijuana Transporter license.**

The proposed ME is located within a permanent facility.

- C. Section 7.4.(E): Required Application Materials for Marijuana Use Special Permits**

- 1. A detailed floor plan of the proposed Marijuana Use that identifies the square footage available and describes the functional areas of the facility.**

Please see the floor plan included as part of **Exhibit A**, which identifies the square footage available and describes the functional areas of the facility.

- 2. Detailed Site Plans that include the following information:**

- a. Compliance with the requirements for parking and loading spaces, for lot size, frontage, yards and heights and coverage of buildings, signage and all other provisions of this By-Law;**

Please see the site plan included as part of **Exhibit A**, which includes a compliance table outlining requirements as outlined above for the existing structure.

- b. Convenience and safety of vehicular and pedestrian movement on the site to provide secure and safe access and egress to and from the site;**

Please see the site plan included as part of **Exhibit A**, which demonstrates the existing parking development which was previously designed to ensure convenience and safety of vehicular and pedestrian movement to the site to provide secure and safe access and egress to and from the site.

- c. Convenience and safety of vehicular and pedestrian movement off the site, if vehicular and pedestrian traffic off-site can reasonably be expected be substantially affected by on-site changes;**

Please see the site plan included as part of **Exhibit A**, which demonstrates the existing parking development which was previously designed to ensure convenience and safety of vehicular and pedestrian movement when accessing the site through multiple points of entry to the parking lot.

- d. Adequacy as to the arrangement and the number of parking and loading spaces in relation to the proposed use of the premises;**

Please see the site plan included as part of **Exhibit A**, which provides a parking table demonstrating satisfaction with parking requirements as outlined in the Lakeville Zoning Bylaws. Additionally, there is additional unused paved area that can facilitate additional parking spaces if needed.

- e. Site design such that it provides convenient, secure and safe access and egress for clients and employees arriving to and from the site.**

Please see the site plan included as part of **Exhibit A**, which was previously designed to provide convenient, secure and safe access and egress for clients and employees arriving to and from the site.

- f. Design and appearance of proposed buildings, structures, freestanding signs, screening and landscaping; and**

The applicant proposes minor wayfinding and parking signage in full compliance with all requirements set forth by the Town of Lakeville. No other exterior changes are proposed to the exterior of the structure or any nearby landscaping.

- g. Adequacy of water supply, surface and subsurface drainage and light.**

The changes proposed as part of this permit application would not necessitate modifications to the existing utilities provided as part of the building structure.

3. A copy of the Written Operating Procedures as required by 935 CMR 500.105 and/or 935 CMR 501.105, which shall include, at a minimum, the following:

a. Security measures in compliance with 935 CMR 500.110 and/or 935 CMR 501.110, to the extent such information may be made publicly available;

Please see **Exhibit B** which provides a security narrative outlining compliance with 935 CMR 500.110. Facility specific security materials can be made available upon request.

b. Employee security policies;

Please see **Exhibit C** which outlines employee security policies.

c. Proposed hours of operation and after- hours contact information;

Bud's Goods proposes the following hours of operation:

Monday – Friday: 6:00 am – 8:00 pm

After hours contact: Alexander Mazin, alex@budsgoods.com, 774-239-2200

d. Proposal for storage of marijuana;

Please see **Exhibit D** which outlines marijuana storage procedures.

e. Emergency procedures, including a disaster plan in case of fire or other emergencies;

Please see **Exhibit E** which outlines emergency procedures, including a disaster plan in case of fire and other emergencies.

f. Policies and procedures for preventing the diversion of marijuana to individuals younger than 21 years old;

Please see **Exhibit F** which outlines policies and procedures to prevent the diversion of marijuana to individuals under the age of 21.

g. Policies and procedures for energy efficiency and conservation in accordance with 935 CMR 500.105, and a plan for implementation of such policies;

Bud's Goods has developed the following Energy Compliance Plan to ensure that its Cultivation and Manufacturing facility facility remains in compliance with the energy efficiency and conservation regulations codified in 935 CMR 500.103(1)(b), 500.105(1)(q), 500.105(15) and 500.120(11).

Energy Efficiency and Equipment Standards

Bud's Goods will maintain compliance at all times with the Commission's minimum energy efficiency and equipment standards and meet all applicable environmental laws, regulations, permits and other applicable approvals including, but not limited to, those related to water quality and quantity, wastewater, solid and hazardous waste management, and air pollution control, including prevention of odor and noise pursuant to 310 CMR 7.00: Air Pollution Control. Bud's Goods will adopt and use additional best management practices as determined by the Commission to reduce energy.

Building Envelope

The building envelope for Bud's Goods' indoor cultivation and manufacturing facility, to the extent applicable, meets minimum Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: State Building Code), International Energy Conservation Code (IECC) Section C402 or The American Society of Heating, Refrigerating and Air-conditioning Engineers (ASHRAE) Chapters 5.4 and 5.5 as applied or incorporated by reference in 780 CMR: State Building Code.

Bud's Goods is considering the following strategies to reduce electric demand:

1. LED lighting
2. Lighting schedule implementation
3. Active load management and energy storage programs

As the need and opportunity for facility upgrades and maintenance arise in the future, Bud's Goods will continue to evaluate strategies to reduce electric demand.

Opportunities for Engagement with Energy Efficiency Programs

Bud's Goods plans on engaging with the energy efficiency program offered by Mass Save and will coordinate with Lakeville officials to identify other potential energy saving programs and initiatives.

HVAC and Dehumidification

Bud's Goods' Heating Ventilation and Air Condition (HVAC) and dehumidification systems will meet Massachusetts Building Code

requirements and all Massachusetts amendments (780 CMR State Building Code), IECC Section C403 or ASHRAE Chapter 6 as applied or incorporated by reference in (780 CMR: State Building Code). As part of the documentation required under 935 CMR 500.120(11)(b), Bud's Goods will provide a certification from a Massachusetts Licensed Mechanical Engineer that the HVAC and dehumidification systems meet Massachusetts building code as specified in 935 CMR 500.120(11)(c) and that such systems have been evaluated and sized for the anticipated loads of the facility.

h. A copy of proposed waste disposal procedures.

Please see the above

IV. Compliance with Town of Lakeville Zoning Bylaw Section 7.4.1

1. The use is not noxious, harmful or hazardous, is socially and economically desirable and will meet an existing or potential need.

Bud's Goods has demonstrated that it has taken great care to minimize any adverse impacts on abutters and parties of interest through thoughtful site design and the implementation of comprehensive standard operating procedures, including:

- The selection of a Property within the Marijuana Zoning Overlay which has been identified as an appropriate zone for ME uses and is not within 500 feet of any offending buffer uses;
- The design of a state-of-the-art facility that has been specifically developed to accommodate best practices for ME uses;
- On site to protect against congestion at the site;
- An odor control plan to protect against odor escape from the vault;
- Nuanced signage, exterior design, and screening to maintain a respectful streetscape façade; and
- A thoughtful operational plan for all facets of its operations.

2. The advantages of the proposed use outweigh any detrimental effects, and such detrimental effects on the neighborhood and the environment will not be greater than could be expected from development which could occur if the special permit were denied.

Bud's Goods has demonstrated that it has taken great care to minimize any adverse impacts on abutters and parties of interest through thoughtful site design and the implementation of comprehensive standard operating procedures, including:

- The selection of a Property within the Marijuana Zoning Overlay which has been identified as an appropriate zone for ME uses and is not within 500 feet of any offending buffer uses;
- The design of a state-of-the-art facility that has been specifically developed to accommodate best practices for ME uses;
- On site to protect against congestion at the site;
- An odor control plan to protect against odor escape from the vault;
- Nuanced signage, exterior design, and screening to maintain a respectful streetscape façade; and
- A thoughtful operational plan for all facets of its operations.

3. The applicant has no reasonable alternative available to accomplish this purpose in a manner more compatible with the character of the immediate neighborhood.

Bud's Goods selected a parcel appropriately located within the Marijuana Overlay District, which was designed to be compatible with the surrounding neighborhood.

PREVENTION OF DIVERSION

Bud's Goods & Provisions Corp.'s ("Bud's Goods") operating policies and procedures ensure prevention of diversion, theft, and illegal or unauthorized conduct pursuant to the Commission's Adult Use of Marijuana regulations codified in 935 CMR 500.000. Considerations regarding diversion prevention measures include, but are not limited to, marijuana establishment agent and consumer accountability, and identifying, recording, and reporting diversion, theft, or loss. Marijuana in the process of transport, analysis, or retail sale is to be stored and tracked in a manner that prevents diversion, theft, or loss.

More specifically, diversion measures include policies and procedures requiring that:

- Identification will be verified on the premises to ensure that only individuals 21 years or older are permitted in Bud's Goods' adult-use marijuana establishment.
- Any marijuana establishment agent who has diverted marijuana will be immediately dismissed, which will be reported to law enforcement and the Commission pursuant to 935 CMR 500.105(1)(m).
- All employees involved in the handling and sale of marijuana for adult use will complete a responsible vendor training program with a curriculum covering diversion prevention and prevention of sales to minors and will comply with all other marijuana establishment agent training requirements under 935 CMR 500.105(2).
- Bud's Goods will only engage in reasonable marketing, advertising, and branding practices that do not promote the diversion of marijuana and that comply with all other marketing and advertising requirements under 935 CMR 500.105(4).
- Warning statements required by the Commission's regulations will be affixed to all applicable products, and Bud's Goods' labels will comply with all other labeling of marijuana and marijuana products requirements under 935 CMR 500.105(5).
- Tamper or child-resistant packaging will be used for applicable marijuana products, and Bud's Goods' products will comply with all other packaging of marijuana and marijuana products requirements under 935 CMR 500.105(6).
- Bud's Goods will maintain real-time inventory and will track and tag all marijuana seeds, clones, plants, and marijuana products, using Metrc as the seed-to-sale methodology in a form and manner to be approved by the Commission.
- Records will be kept for inventory, seed-to-sale tracking for all marijuana products, personnel (including documentation of the completion of required training), and waste disposal, and Bud's Goods will comply with all other record keeping requirements under 935 CMR 500.105(9).
- Marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, will be stored in a separate area, until such products are destroyed; and Bud's Goods will comply with all other storage requirements under 935 CMR 500.105(11).
- Two or more marijuana establishment agents will witness and document how the marijuana waste is disposed or otherwise handled, and Bud's Goods will comply with all other waste disposal requirements under 935 CMR 500.105(12).
- All transported marijuana products will be linked to Metrc; all vehicles transporting marijuana will be staffed with a minimum of two marijuana establishment agents; and any vehicle accidents, diversions, or other reportable incidents that occur during transport will be reported to the Commission and law enforcement within 24 hours. Bud's Goods will comply with all other transportation requirements under 935 CMR 500.105(13).
- All security requirements under 935 CMR 500.110 will be followed, including:
 - Implementing sufficient safety measures to deter theft of marijuana and marijuana products and prevent unauthorized entrance into areas containing marijuana and marijuana products

- at Bud's Goods' adult-use marijuana establishment location to protect the premises, employees, Bud's Goods' agents, consumers, and the general public;
- Adopting procedures to prevent loitering and to ensure that only individuals engaging in activity expressly or by necessary implication permitted by the Commission's regulations and its enabling statute are allowed to remain on the premises;
 - Storing all finished marijuana products in a secure, locked safe or vault in such a manner as to prevent diversion, theft, and loss;
 - Restricting access to employees, agents or volunteers specifically permitted by Bud's Goods, agents of the Commission, state and local law enforcement and emergency personnel, and all other limited access areas requirements under 935 CMR 500.110(4);
 - Implementing an adequate security system to prevent and detect diversion, theft or loss of marijuana, notifying law enforcement and the Commission within 24 hours of a diversion, theft or loss of any marijuana product, and all other security and alarm requirements under 935 CMR 500.110(5); and
 - Obtaining, at Bud's Goods' own expense, a security system audit by a vendor approved by the Commission, and all other security audits requirements under 935 CMR 500.110(10).

STORAGE OF MARIJUANA

Bud's Goods & Provisions Corp. ("Bud's Goods") will ensure that all marijuana and marijuana products are stored in compliance with 935 CMR 500.105(11). Specifically, Bud's Goods will ensure the following:

- The facility will have adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105: *General Operational Requirements for Marijuana Establishments* and 500.110: *Security Requirements for Marijuana Establishments*;
- The facility will have separate areas for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, until such products are destroyed;
- All storage areas will be maintained in a clean and orderly condition;
- All storage areas will be free from infestation by insects, rodents, birds, and pests; and
- All storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110 *Security Requirements for Marijuana Establishments*.

Per the requirements of 935 CMR 500.110, all finished marijuana products will be stored in a secure, locked safe or vault in such a manner as to prevent diversion, theft, and loss. The vault will be a secure, limited access storage room that is outfitted with adequate security features for the purposes of storing Marijuana or Marijuana Products. The vault will be adequately sized to store inventory that is not being actively handled for purposes of dispensing, packaging, processing or transportation. Furthermore, all safes, vaults, and any other equipment or areas used for the storage of marijuana or marijuana products, including prior to disposal, will be securely locked and protected from entry, except for the actual time required to remove or replace marijuana.

The storage of finished products will be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers, per the requirements of 935 CMR 500.105(3)(b)(15). In accordance with 935 CMR 500.105(3)(c), Bud's Goods will comply with sanitary requirements. All edible products will be prepared, handled and stored in compliance with the sanitation requirements in 105 CMR 590.000: *State sanitary code chapter X: Minimum Sanitation Standards for Food Establishments*.

TRANSPORTATION OF MARIJUANA

Bud's Goods & Provisions Corp. ("Bud's Goods") will ensure that all transported marijuana and products are properly tracked through Metrc. Bud's Goods will properly track and label all seeds and clones in the

form and manner deemed acceptable by the Commission. Bud's Goods will only transport marijuana from its licensed facilities to other licensed Marijuana Establishments as permitted by Bud's Goods' license. There will be no advertising, including, but not limited to, vinyl-wrapped vehicles, signs, logos or markings, indicating that the vehicle is being used to transport marijuana on transportation vehicles not owned by Bud's Goods.

Any vehicle used to transport or deliver marijuana or marijuana products will comply with applicable Massachusetts Registry of Motor Vehicles (RMV) requirements. A Bud's Goods. vehicle will not include any additional external marking that indicate the vehicle is being used to transport or deliver marijuana or marijuana products.

All vehicles will be equipped with a video system that includes one or more video cameras in the storage area of the vehicle and one or more video cameras in the driver area of the vehicle and which shall remain operational at all times during the entire transportation process and which shall have the ability to produce a clear color still photo whether live or recorded and a date and time stamp embedded in all recordings which shall always be synchronized and set correctly and shall not significantly obscure the picture. In the event that any marijuana product is undeliverable or refused by the destination, Bud's Goods will ensure that it will be transported back to Bud's Goods' originating facility.

Bud's Goods will staff all vehicles transporting marijuana and marijuana products with at least two Bud's Goods agents, one of whom will remain in the vehicle at all times that the vehicle contains marijuana or marijuana products. Prior to departing the premises to transport marijuana products, Bud's Goods will make a video record of weighing, inventorying, and accounting for all marijuana products to be transported.

When receiving transported marijuana, within eight hours after arrival, Bud's Goods will re-weigh, re-inventory, and account for, on video, all marijuana and marijuana products received. When videotaping the weighing, inventorying, and accounting of marijuana and marijuana products before transportation or after receipt, Bud's Goods will ensure that the video shows each product being weighed, the weight, and the manifest. Prior to departure from its facility, Bud's Goods will package marijuana and marijuana products in sealed, labeled, and child-resistant packaging, and ensure that marijuana and marijuana products remain as such during transportation.

All vehicles and transportation equipment used in the transportation of marijuana products requiring temperature control for safety must be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana or marijuana products from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c). Any vehicle used to transport marijuana or marijuana products will be owned or leased by Bud's Goods or a marijuana transporter, will be properly registered, inspected and insured in the Commonwealth, and equipped with an alarm system.

In the case of an emergency stop during the transportation of marijuana or marijuana products, Bud's Goods will maintain a log describing the reason for the stop, the duration of the stop, the location of the stop, and any activities of its personnel exiting the vehicle. Bud's Goods comply with applicable requirements of 935 500.110(9): Incident Reporting. Bud's Goods will ensure that all routes used for the transportation of marijuana or marijuana products are randomized and remain within the Commonwealth.

Storage Requirements

Bud's Goods will transport marijuana and marijuana products in secure, locked storage compartments that are a part of the vehicle transporting the marijuana products and cannot be easily removed. Storage and transportation of finished products will be under conditions that will protect them against physical,

chemical, and microbial contamination, while also protecting against deterioration of finished products or their containers. Marijuana and marijuana products will not be visible from the outside of the vehicle.

If and when Bud's Goods transports marijuana or marijuana products to more than one Marijuana Establishment at a time, the marijuana and marijuana products for each marijuana establishment will be kept in a separate locked storage compartment during transportation, and separate manifests will be maintained for each marijuana establishment. If and when Bud's Goods is transporting marijuana and marijuana products to multiple marijuana establishments, Bud's Goods will obtain permission from the Commission to adopt reasonable alternative safeguards. When transporting marijuana and marijuana products, no other products will be transported or stored in the vehicle nor will firearms be located in the vehicle or on transporting agents.

Communications

Any vehicle used by Bud's Goods to transport marijuana and marijuana products will contain a global positioning system (GPS) monitoring device that is:

- Not a mobile device that is easily removable;
- Attached to the vehicle at all times that the vehicle contains marijuana and marijuana products; and
- Monitored by Bud's Goods during transport of marijuana and marijuana products. Bud's Goods will obtain an inspection from the Commission prior to initial transportation of marijuana and marijuana products and after any alteration to the locked storage compartment.

Each Bud's Goods agent transporting marijuana products will have access to a secure form of communication with personnel at Bud's Goods at all times that the vehicle contains marijuana and marijuana products. Bud's Goods will utilize either two-way digital or analog radio, cellular phones, or satellite phones for these purposes dependent upon the transportation area, base capabilities, cellular signal coverage, antenna coverage, and frequency of transportation.

Prior to and immediately after leaving Bud's Goods premises, Bud's Goods agents will be required to use a secure form of communication to contact agents at the Bud's Goods facility to test communications and GPS operability. In the event that communications or the GPS system fail while on route, the Bud's Goods agents transporting marijuana or marijuana products must return to the originating Bud's Goods location until the communication system or GPS system is once again operational. Marijuana establishment agents transporting marijuana or marijuana products will be required to contact the Bud's Goods facility when stopping at and leaving any scheduled location, and regularly throughout the trip, at least every 30 minutes.

Bud's Goods will ensure that there is a Bud's Goods agent assigned to monitoring the GPS unit and secure form of communication, who will be required to log all official communications with marijuana establishment agents transporting marijuana products. All manifests used in the transportation of marijuana will be filled out by Bud's Goods agents in triplicate, with the original manifest remaining with Bud's Goods, a second copy provided to the destination marijuana establishment upon arrival, and a copy to be kept with the Bud's Goods agent during transportation and returned to the marijuana establishment or marijuana transporter upon completion of the transportation. Bud's Goods will securely transmit the manifest to the destination marijuana establishment via facsimile or email prior to departure.

Manifests

Upon arrival at the destination marijuana establishment, Bud's Goods' agents will compare the manifest produced by Bud's Goods agent and the copy transmitted by facsimile or email to the destination marijuana establishment. Each manifest will include, at a minimum, the originating marijuana establishment name, address, and registration number; the names and registration numbers of the agents who transported the marijuana products; the name and registration number of the marijuana establishment agent who prepared the manifest; the destination marijuana establishment name, address, and registration number; a description

of the marijuana and marijuana products being transported, including the weight and form or type of the product; the mileage of the transporting vehicle at departure and mileage upon arrival at destination marijuana establishment, as well as mileage upon return to Bud's Goods; the date and time of departure from Bud's Goods and arrival at destination marijuana establishment for each transportation; a signature line for the marijuana establishment agent who receives the marijuana products; the weight and inventory before departure and upon receipt; the date and time that the transported products were re-weighed and re-inventoried; the name of the marijuana establishment agent at the destination marijuana establishment who re-weighed and re-inventoried products; and the vehicle make, model, and license plate number.

Bud's Goods will maintain the manifest inside of its vehicle throughout the entire transportation process until delivery is complete. All transportation manifests will be retained by Bud's Goods for a minimum of one year and will be available for inspection by the Commission upon request. Should any unusual discrepancy occur in weight or inventory, Bud's Goods agents will document and report the discrepancy to the Commission and law enforcement authorities not more than 24 hours after the discovery of such a discrepancy. Bud's Goods agents will report to the Commission and law enforcement authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, not more than 24 hours after such accidents, diversions, losses, or other reportable incidents.

Each agent transporting or handling marijuana or marijuana products for Bud's Goods will be registered as a marijuana establishment agent and have a driver's license in good standing issued by the Massachusetts Registry of Motor Vehicles for all classes of vehicle the marijuana establishment agent will operate for Bud's Goods prior to transporting or otherwise handling Bud's Goods' marijuana or marijuana products.

All Bud's Goods agents will carry their registration cards at all times when transporting marijuana or marijuana products for Bud's Goods and will produce their registration card to the Commission or law enforcement officials upon request. Bud's Goods will use best management practices to reduce energy and water usage, engage in energy conservation, and mitigate other environmental impacts wherever possible.

Representatives of the Commission, other Commonwealth agencies, and emergency responders responding in the course of an emergency will have access to all Bud's Goods transportation vehicles as necessary.

INVENTORY PROCEDURES

Bud's Goods & Provisions Corp. ("Bud's Goods") will maintain real-time inventory in compliance with 935 CMR 500.105(8), including, at a minimum, maintaining inventory of marijuana plants; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal. All marijuana seeds, clones, plants, and marijuana products will be tagged and tracked within Metrc.

Bud's Goods will utilize Metrc, a real-time seed-to-sale tracking system, which will provide the electronic tracking of individual marijuana plants, including during cultivation, growth, harvest and preparation of marijuana products (as applicable), and final sale. Metrc will allow Bud's Goods to utilize unique-plant and unique-batch identification numbers to accurately track inventory.

Bud's Goods will:

- Establish inventory controls and procedures for the conduct of inventory reviews, and comprehensive inventories of marijuana products in the process of cultivation, and finished, stored marijuana;
- Conduct a monthly inventory of marijuana in the process of cultivation and finished, stored marijuana;
- Conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and

- Promptly transcribe inventories if taken by use of an oral recording device.

The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory. All inventory records will be kept in accordance with Bud's Goods' record keeping procedures. Bud's Goods' agents will document and Bud's Goods will report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours after the discovery of such a discrepancy.

Waste Disposal

Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated will be segregated from other products and destroyed in accordance with the provisions of 935 CMR 500.105(12), and any such waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. Specifically, liquid waste containing marijuana or by-products of marijuana processing will be disposed of in compliance with all applicable state and federal requirements, including but not limited to, for discharge of pollutants into surface water or groundwater (Massachusetts Clean Waters Act, M.G.L. c. 21 §§ 26-53; 314 CMR 3.00: Surface Water Discharge Permit Program; 314 CMR 5.00: Groundwater Discharge Program; 314 CMR 12.00: Operation Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Dischargers; the Federal Clean Water Act, 33 U.S.C. 1251 et seq., the National Pollutant Discharge Elimination System Permit Regulations at 40 CFR Part 122, 314 CMR 7.00: Sewer System Extension and Connection Permit Program), or stored pending disposal in an industrial wastewater holding tank in accordance with 314 CMR 18.00: Industrial Wastewater Holding Tanks and Containers.

Organic material, recyclable material, and solid waste generated at a marijuana establishment will be redirected or disposed of as follows:

1. Organic material and recyclable material will be redirected from disposal in accordance with the waste disposal bans described at 310 CMR 19.017: Waste Bans.
2. To the greatest extent feasible:
 - a. Any recyclable material as defined in 310 CMR 16.02: *Definitions* will be recycled in a manner approved by the Commission; and
 - b. Any remaining marijuana waste will be ground and mixed with other organic material as defined in 310 CMR 16.02: *Definitions* such that the resulting mixture renders the marijuana unusable for its original purpose. Once such marijuana waste has been rendered unusable, the mixture may be composted or digested at an aerobic or anaerobic digester at an operation that is in compliance with the requirements of 310 CMR 16.00: Site Assignment Regulations for Solid Waste Facilities.
3. Solid waste containing marijuana waste will be ground up and mixed with solid wastes such that the resulting mixture renders the marijuana unusable for its original purposes. Once such marijuana waste has been rendered unusable, it will be brought to a solid waste transfer facility or a solid waste disposal facility (e.g., landfill or incinerator) that holds a valid permit issued by the Department of Environmental Protection or by the appropriate state agency in the state in which the facility is located.

No fewer than two Bud's Goods agents will witness and document how the marijuana waste is disposed or otherwise handled (recycled, composted, etc.) in accordance with 935 CMR 500.105(12). When marijuana products or waste is disposed or handled, Bud's Goods will create and maintain a written or electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Bud's Goods agents will be present during the disposal or other handling, with their signatures. Bud's Goods will keep these records for at least three

years. Bud's Goods understands that this period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

QUALITY CONTROL AND TESTING

Quality Control

Bud's Goods & Provisions Corp. ("Bud's Goods") will comply with the following sanitary requirements:

1. Any Bud's Goods agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any Bud's Goods agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:
 - a. Maintaining adequate personal cleanliness; and
 - b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. Bud's Goods' hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in Bud's Goods' production areas and where good sanitary practices require employees to wash and sanitize their hands, and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. Bud's Goods' facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Bud's Goods will ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. Bud's Goods' floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. Bud's Goods' facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Bud's Goods' buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. Bud's Goods will ensure that all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;
10. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products. Toxic items will not be stored in an area containing products used in the cultivation of marijuana. Bud's Goods acknowledges and understands that the Commission may require Bud's Goods to demonstrate the intended and actual use of any toxic items found on Bud's Goods' premises;
11. Bud's Goods will ensure that its water supply is sufficient for necessary operations, and that any private water source will be capable of providing a safe, potable, and adequate supply of water to meet Bud's Goods' needs;
12. Bud's Goods' plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the

marijuana establishment. There will be no cross-connections between the potable and wastewater lines;

13. Bud's Goods will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. Bud's Goods will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. Bud's Goods will store and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

Bud's Goods' vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety will be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

Bud's Goods will ensure that Bud's Goods' facility is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements.

Bud's Goods will follow established policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures are sufficient to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by Bud's Goods to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety.

Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated will be disposed of in accordance with the provisions of 935 CMR 500.105(12), and any such waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

Bud's Goods will process marijuana in a safe and sanitary manner. Bud's Goods will process the leaves and flowers of the female marijuana plant only, which will be:

- Well-cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, and bacterial diseases;
- Prepared and handled on food-grade stainless steel tables; and
- Packaged in a secure area.

All edible products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments, and any marijuana product that is made to resemble a typical food or beverage product will be packaged and labeled as required by 935 CMR 500.105(5) and 500.105(6). When selling or otherwise transferring marijuana to another marijuana establishment Bud's Goods will provide documentation of its compliance with the testing requirements of 935 CMR 500.160: *Testing of Marijuana and Marijuana Products*, and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect marijuana products against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation.

Testing

Bud's Goods will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

Any Independent Testing Laboratory relied upon by Bud's Goods for testing will be licensed or registered by the Commission and (i) currently and validly licensed under 935 CMR 500.101: *Application Requirements*, or formerly and validly registered by the Commission; (ii) accredited to ISO 17025:2017 or the most current International Organization for Standardization 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Accrediting Cooperation mutual recognition arrangement or that is otherwise approved by the Commission; (iii) independent financially from any Medical Marijuana Treatment Center, Marijuana Establishment or Licensee; and (iv) qualified to test marijuana and marijuana products, including marijuana-infused products, in compliance with M.G.L. c. 94C, § 34; M.G.L. c. 94G, § 15; 935 CMR 500.000: *Adult Use of Marijuana*; 935 CMR 501.000: *Medical Use of Marijuana*; and Commission protocol(s).

Testing of Bud's Goods' marijuana products will be performed by an Independent Testing Laboratory in compliance with a protocol(s) established in accordance with M.G.L. c. 94G, § 15 and in a form and manner determined by the Commission, including but not limited to, the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*. Testing of Bud's Goods' environmental media will be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the Commission.

Bud's Goods' marijuana will be tested for the cannabinoid profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides. In addition to these contaminant tests, final ready-to-sell Marijuana Vaporizer Products shall be screened for heavy metals and Vitamin E Acetate (VEA) in accordance with the relevant provisions of the *Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations*. Bud's Goods acknowledges and understands that the Commission may require additional testing.

Bud's Goods' policy of responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1) will include notifying the Commission (i) within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch and (ii) of any information regarding contamination as specified by the Commission immediately upon request by the Commission. Such notification will be from both Bud's Goods and the Independent Testing Laboratory, separately and directly, and will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

Bud's Goods will maintain testing results in compliance with 935 CMR 500.000 *et seq* and the record keeping policies described herein and will maintain the results of all testing for no less than one year. Bud's Goods acknowledges and understands that testing results will be valid for a period of one year, and that marijuana or marijuana products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of Bud's Goods' marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 500.105(11). All excess marijuana will be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to Bud's Goods for disposal or by the Independent Testing Laboratory disposing of it directly. All Single-servings of marijuana products will be tested for potency in accordance with 935 CMR 500.150(4)(a) and subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).

Any marijuana or marijuana products that fail any test for contaminants must either be reanalyzed without remediation, remediated or disposed of. In the event marijuana or marijuana products are reanalyzed, a sample from the same batch shall be submitted for reanalysis at the ITL that provided the original failed result. If the sample passes all previously failed tests at the initial ITL, an additional sample from the same batch previously tested shall be submitted to a second ITL other than the initial ITL for a Second Confirmatory Test. To be considered passing and therefore safe for sale, the sample must have passed the Second Confirmatory Test at a second ITL. Any Marijuana or Marijuana Product that fails the Second Confirmatory Test will not be sold, transferred or otherwise dispensed to Consumers, Patients or Licensees without first being remediated. Otherwise, any such product shall be destroyed in compliance with 935 CMR 500.105(12): *Waste Disposal*.

If marijuana or marijuana products are destined for remediation, a new test sample will be submitted to a licensed ITL, which may include the initial ITL for a full-panel test. Any failing Marijuana or Marijuana Product may be remediated a maximum of two times. Any Marijuana or Marijuana Product that fails any test after the second remediation attempt will not be sold, transferred or otherwise dispensed to Consumers, Patients or Licensees and will be destroyed in compliance with 935 CMR 500.105(12): *Waste Disposal*.

Quality Control Samples

Bud's Goods may create sample Marijuana Product ("Marijuana") to be provided internally to employees for purposes of ensuring product quality and making determinations about whether to sell the Marijuana. Quality Control Samples and employee feedback regarding such samples will allow Bud's Goods to produce the highest quality Marijuana Products for distribution on the adult use market. Quality Control Samples provided to employees may not be consumed on Bud's Goods' Premises nor may they be sold to another licensee or Consumer. Quality Control Samples will be tested in accordance with 935 CMR 500.160: Testing of Marijuana and Marijuana Products. Bud's Goods will limit the Quality Control Samples provided to all employees in a calendar month period to the following aggregate amounts:

1. Five grams of Marijuana concentrate or extract, including but not limited to tinctures;
2. Five hundred milligrams of Edibles whereby the serving size of each individual sample does not exceed five milligrams and otherwise satisfies the potency levels set forth in 935 CMR 500.150(4): Dosing Limitations; and
3. Five units of sale per Cannabis product line and no more than six individual Cannabis product lines. For purposes of 935 CMR 500.130(8): Vendor Samples, a Cannabis product line shall mean items bearing the same Stock Keeping Unit Number.

If Quality Control Samples are provided as Vendor Samples pursuant to 935 CMR 500.130(8), they will be assigned a unique, sequential alphanumeric identifier and entered into the Seed-to-sale SOR in a form and manner to be determined by the Commission, and further, shall be designated as "Quality Control Sample." Quality Control Samples will have a legible, firmly Affixed label on which the wording is no less than 1/16 inch in size containing at minimum the following information:

1. A statement that reads: "QUALITY CONTROL SAMPLE NOT FOR RESALE";
2. The name and registration number of the Marijuana Product Manufacturer;
3. The quantity, net weight, and type of Marijuana flower contained within the package; and
4. A unique sequential, alphanumeric identifier assigned to the Production Batch associated with the Quality Control Sample that is traceable in the Seed-to-sale SOR.

Upon providing a Quality Control Sample to an employee, Bud's Goods will record:

1. The reduction in quantity of the total weight or item count under the unique alphanumeric identifier associated with the Quality Control Sample;
2. The date and time the Quality Control Sample was provided to the employee;
3. The agent registration number of the employee receiving the Quality Control Sample; and

4. The name of the employee as it appears on their agent registration card.

RECORDKEEPING PROCEDURES

Bud's Goods & Provisions Corp. ("Bud's Goods") has established policies regarding recordkeeping and record-retention in order to ensure the maintenance, safe keeping, and accessibility of critical documents. Electronic and wet signatures are accepted forms of execution of Bud's Goods documents. Records will be stored at Bud's Goods in a locked room designated for record retention. All written records will be available for inspection by the Commission upon request.

Recordkeeping

To ensure that Bud's Goods is keeping and retaining all records as noted in this policy, reviewing Corporate Records, Business Records, and Personnel Records to ensure completeness, accuracy, and timeliness of such documents will occur as part of Bud's Goods' quarter-end closing procedures. In addition, Bud's Goods' operating procedures will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis.

- **Corporate Records**

Corporate Records are defined as those records that require, at a minimum, annual reviews, updates, and renewals, including:

- Insurance Coverage:
 - Directors & Officers Policy
 - Product Liability Policy
 - General Liability Policy
 - Umbrella Policy
 - Workers Compensation Policy
 - Employer Professional Liability Policy
- Third-Party Laboratory Contracts
- Commission Requirements:
 - Annual Agent Registration
 - Annual Marijuana Establishment Registration
- Local Compliance:
 - Certificate of Occupancy
 - Special Permits
 - Variances
 - Site Plan Approvals
 - As-Built Drawings
- Corporate Governance:
 - Annual Report
 - Secretary of Commonwealth Filings

- **Business Records**

Business Records require ongoing maintenance and updates. These records can be electronic or hard copy (preferably electronic) and at minimum include:

- Assets and liabilities;
- Monetary transactions;
- Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- Sales records including the quantity, form, and cost of marijuana products;
- Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over Bud's Goods.

- **Personnel Records**

At a minimum, Personnel Records will include:

- Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
- A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with Bud's Goods and will include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - Documentation of verification of references;
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - Documentation of periodic performance evaluations; and
 - A record of any disciplinary action taken.
 - Notice of completed responsible vendor and eight-hour related duty training.
- A staffing plan that will demonstrate accessible business hours and safe operating conditions;
- Personnel policies and procedures; and
- All background check reports obtained in accordance with 935 CMR 500.030: Registration of Marijuana Establishment Agents 803 CMR 2.00: Criminal Offender Record Information (CORI).
- Handling and Testing of Marijuana Records
 - Bud's Goods will maintain the results of all testing for a minimum of one (1) year.
- Inventory Records
 - The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.
- Seed-to-Sale Tracking Records
 - Bud's Goods will use Metrc as the seed-to-sale tracking software to maintain real-time inventory. The seed-to-sale tracking software inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(e), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.
- Incident Reporting Records
 - Within ten (10) calendar days, Bud's Goods will provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a), by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified within twenty-four (24) hours of discovering the breach or incident.
 - All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) will be maintained by Bud's Goods for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within Bud's Goods' jurisdiction on request.
- Visitor Records
 - A visitor sign-in and sign-out log will be maintained at the security office. The log will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.

- Waste Disposal Records
 - When marijuana or marijuana products are disposed of, Bud's Goods will create and maintain an electronic record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Bud's Goods agents present during the disposal or other handling, with their signatures. Bud's Goods will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.
- Security Records
 - A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.
 - Recordings from all video cameras which shall be enabled to record twenty-four (24) hours each day shall be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission, whichever is longer.
 - Recordings shall not be destroyed or altered and shall be retained as long as necessary if Bud's Goods is aware of pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.
- Transportation Records
 - Bud's Goods will retain all transportation manifests for a minimum of one (1) year and make them available to the Commission upon request.
- Vehicle Records (as applicable)
 - Records that any and all of Bud's Goods' vehicles are properly registered, inspected, and insured in the Commonwealth and shall be made available to the Commission on request.
- Agent Training Records
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).
- Responsible Vendor Training
 - Bud's Goods shall maintain records of Responsible Vendor Training Program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.
- Closure
 - In the event Bud's Goods closes, all records will be kept for at least two (2) years at Bud's Goods' expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, Bud's Goods will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.
- Written Operating Policies and Procedures

Policies and Procedures related to Bud's Goods' operations will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis. Policies and Procedures will include the following:

 - Security measures in compliance with 935 CMR 500.110;
 - Employee security policies, including personal safety and crime prevention techniques;
 - A description of Bud's Goods' hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
 - Storage of marijuana in compliance with 935 CMR 500.105(11);
 - Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;

- Price list for Marijuana and Marijuana Products, and alternate price lists for patients with documented Verified Financial Hardship as defined in 501.002: *Definitions*, as required by 935 CMR 501.100(1)(f);
- Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
- Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
- A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- Alcohol, smoke, and drug-free workplace policies;
- A plan describing how confidential information will be maintained;
- Policy for the immediate dismissal of any dispensary agent who has:
 - Diverted marijuana, which will be reported to Law Enforcement Authorities and to the Commission;
 - Engaged in unsafe practices with regard to Bud's Goods operations, which will be reported to the Commission; or
 - Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
- A list of all board of directors, members, and executives of Bud's Goods, and members, if any, of the licensee must be made available upon request by any individual. This requirement may be fulfilled by placing this information on Bud's Goods' website.
- Policies and procedures for the handling of cash on Bud's Goods premises including but not limited to storage, collection frequency and transport to financial institution(s), to be available upon inspection.
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- Policies and procedures for energy efficiency and conservation that will include:
 - Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
 - Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
 - Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
 - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.
- Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.
- License Renewal Records
 - Bud's Goods shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which

would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

Record-Retention

Bud's Goods will meet Commission recordkeeping requirements and retain a copy of all records for two (2) years, unless otherwise specified in the regulations.

MAINTAINING OF FINANCIAL RECORDS

Bud's Goods & Provisions Corp.'s ("Bud's Goods") operating policies and procedures ensure financial records are accurate and maintained in compliance with the Commission's Adult Use of Marijuana regulations (935 CMR 500). Financial records maintenance measures include policies and procedures requiring that:

- Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including:
 - Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records including the quantity, form, and cost of marijuana products; and
 - Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over Bud's Goods.
- All sales recording requirements under 935 CMR 500.140(5) are followed, including:
 - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
 - Prohibiting the use of software or other methods to manipulate or alter sales data;
 - Conducting a monthly analysis of its equipment and sales data, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
 - If Bud's Goods determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data: 1. it shall immediately disclose the information to the Commission; 2. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and 3. take such other action directed by the Commission to comply with 935 CMR 500.105.
 - Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements;
 - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales;

- Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500

Additional written business records will be kept, including, but not limited to, records of:

- Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
 - Fees paid under 935 CMR 500.005 or any other section of the Commission’s regulations; and
 - Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission’s regulations.
- License Renewal Records
 - Bud’s Goods shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city’s or town’s anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

QUALIFICATIONS AND TRAINING

Bud’s Goods & Provisions Corp. (“Bud’s Goods”) will ensure that all employees hired to work at a Bud’s Goods facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner.

Qualifications

In accordance with 935 CMR 500.030, a candidate for employment as a marijuana establishment agent must be 21 years of age or older. In addition, the candidate cannot have been convicted of a criminal offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States, or foreign jurisdiction, or a military, territorial, or Native American tribal authority.

Bud’s Goods will also ensure that its employees are suitable for registration consistent with the provisions of 935 CMR 500.802. In the event that Bud’s Goods discovers any of its agents are not suitable for registration as a marijuana establishment agent, the agent’s employment will be terminated, and Bud’s Goods will notify the Commission within one (1) business day that the agent is no longer associated with the establishment.

Training

As required by 935 CMR 500.105(2), and prior to performing job functions, each of Bud’s Goods’ agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent’s job function. A Bud’s Goods Agent will receive a total of eight (8) hours of training annually. A minimum of four (4) hours of training will be from Responsible Vendor Training Program (“RVT”) courses established under 935 CMR 500.105(2)(b). Any additional RVT over four (4) hours may count towards the required eight (8) hours of training. Non-RVT may be conducted in-house by Bud’s Goods or by a third-party vendor engaged by the Bud’s Goods. Basic on-the-job training in the ordinary course of business may also be counted towards the required eight (8) hour training. All Bud’s Goods Agents that are

involved in the handling or sale of marijuana at the time of licensure or renewal of licensure will have attended and successfully completed the mandatory Responsible Vendor Training Program operated by an education provider accredited by the Commission.

Basic Core Curriculum

Bud's Goods Agents must first take the Basic Core Curriculum within 90 days of hire, which includes the following subject matter:

- Marijuana's effect on the human body, including:
 - Scientifically based evidence on the physical and mental health effects based on the type of Marijuana Product;
 - The amount of time to feel impairment;
 - Visible signs of impairment; and
 - Recognizing the signs of impairment.
- Diversion prevention and prevention of sales to minors, including best practices.
- Compliance with all tracking requirements.
- Acceptable forms of identification. Training must include:
 - How to check identification;
 - Spotting and confiscating fraudulent identification;
 - Common mistakes made in identification verification.
 - Prohibited purchases and practices, including purchases by persons under the age of 21 in violation of M.G.L. c. 94G, § 13.
- Other key state laws and rules affecting Bud's Goods Agents which shall include:
 - Conduct of Bud's Goods Agents;
 - Permitting inspections by state and local licensing and enforcement authorities;
 - Local and state licensing and enforcement, including registration and license sanctions;
 - Incident and notification requirements;
 - Administrative, civil, and criminal liability;
 - Health and safety standards, including waste disposal;
 - Patrons prohibited from bringing marijuana and marijuana products onto licensed premises;
 - Permitted hours of sale;
 - Licensee responsibilities for activities occurring within licensed premises;
 - Maintenance of records, including confidentiality and privacy; and
 - Such other areas of training determined by the Commission to be included in a Responsible Vendor Training Program.

Bud's Goods will encourage administrative employees who do not handle or sell marijuana to take the "Responsible Vendor" program on a voluntary basis to help ensure compliance. Bud's Goods' records of Responsible Vendor Training Program compliance will be maintained for at least four (4) years and made available during normal business hours for inspection by the Commission and any other applicable licensing authority on request.

After successful completion of the Basic Core Curriculum, each Bud's Goods Agent involved in the handling or sale of marijuana will fulfill the four-hour RVT requirement every year thereafter for Bud's Goods to maintain designation as a Responsible Vendor. Once the Bud's Goods Agent has completed the Basic Core Curriculum, the Agent is eligible to take the Advanced Core Curriculum. Failure to maintain Responsible Vendor status is grounds for action by the Commission.

METHOD USED TO PRODUCE PRODUCTS

Overview

Bud's Goods & Provisions Corp. ("Bud's Goods") will produce concentrates for bulk sale and the creation of marijuana products using supercritical CO₂ and then refined to extremely high purity and cleanliness using a fractional distillation process. The refinement process will reduce levels of microbials (mold, yeast, gram negative bacteria, etc.) and heavy metals down to an undetectable scale. This will ensure Bud's Goods can provide consumers with clean and safe products.

Bud's Goods is committed to producing marijuana products in a safe and sanitary manner. Bud's Goods will process leaves and flowers of the female marijuana plant only, which will be well cured and free of seeds, stems, dirt, sand, debris, and other foreign matter and will not be contaminated by mold, rot, other fungus, and/or bacterial diseases. Marijuana products will be prepared and handled on food-grade stainless steel tables with no contact to agents' bare hands and will be packaged in a secure area.

The Bud's Goods facility will utilize standards based on municipal health codes, as well as FDA codes, to ensure optimal safety of all food products produced and is designed with ample cold storage and sanitization equipment to ensure food safety. All edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: State sanitary code chapter X: Minimum sanitation standards for food establishments, 105 CMR 500.000: *Good Manufacturing Practices for Food*, and with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements* as applicable.

Bud's Goods agents will follow thorough hygienic practices and will maintain adequate personal cleanliness. All Bud's Goods agents will wash their hands thoroughly before starting work, and at any other time when hands may have become soiled or contaminated. Hand-washing facilities will be placed conveniently within the Bud's Goods facility and will be equipped with running water, effective hand-cleaning and sanitizing preparations, suitable drying devices, and sufficient storage for all cleaning and sanitation materials. All Bud's Goods agents will also wear food grade disposable gloves when handling marijuana and in the creation of marijuana products.

Food material used in the preparation of marijuana products will be acquired from an approved source. Any and all materials used in the production of marijuana products that can support the rapid growth of undesirable microorganisms will be stored in a manner that prevents the growth of such microorganisms, such as proper refrigeration or other appropriate storage. All thermometers used in the storage and preparation of marijuana products will be tested regularly to ensure accuracy. All food products will be properly stored in their original containers and will be properly labeled. Only approved food additives will be used. Marijuana products and food products used in the production of marijuana products will be maintained in good condition and will be unadulterated.

The Bud's Goods facility has ample space for placement of equipment and storage of materials necessary for maintaining sanitary operations. Litter and waste will be properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12).

All surfaces and equipment within the Bud's Goods facility will be cleaned frequently in order to ensure that they are kept in a clean and sanitary condition. Surfaces and equipment will be sanitized with a sanitizing agent registered by the EPA and used in accordance with the labeled instructions. Any and all toxic materials will be properly identified and stored in a manner that protects against contamination of marijuana products. Proper safety and cleanliness procedures will be visibly posted or easily accessible in the Bud's Goods facility. Bud's Goods' water supply is sufficient for necessary operations. Toxic items will not be stored in an area containing products used in the cultivation of Marijuana.

Notwithstanding a stricter municipal or state regulation, Bud's Goods will identify the method of extraction (i.e. CO2) on a physical posting at all entrances of its facility. The posting will be a minimum of 12" x 12" and identify the method of extraction in lettering no smaller than one inch in height. Bud's Goods will post a copy of a permit to keep, store, handle or otherwise use flammable and combustible at each place of operation within the facility. Bud's Goods, when selling or otherwise transferring marijuana to another marijuana establishment, will provide documentation of its compliance, or lack thereof, with the testing requirements of 935 CMR 500.160, and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect marijuana products against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation.

In addition to the written operating policies required under 935 CMR 500.105(1), Bud's Goods will maintain written policies and procedures for the production or distribution of marijuana products, as applicable in accordance with 935 CMR 500.130.

Product Manufacturer Processes

The Bud's Goods facility utilizes state of the art extraction technology by way of a supercritical fluid (SCCO2) botanical extractor. Further refinement of this raw CO2 concentrate will be accomplished using a fractional distillation still for removal of any trace amounts of microbial and heavy metals contamination. This highly purified concentrate will be used in precision-dosed marijuana products, as well as sold in bulk and in vaporizer cartridges.

- Drying: Any material to be processed through the supercritical fluid CO2 extractor will be dried as much as possible. Trim is to be dried on perforated sheet pans lined with parchment and placed on speed racks. Trim material will be laid on sheet pans in a thin layer in order to dry properly and quickly. A fan will circulate air around the trim in order to expedite drying, as well as prohibit biological contamination. Trim and whole plant material may also be dried in the ovens at a low temperature so as to prevent decarboxylation.
 - Safety: If trim or plant material is handled in the Bud's Goods facility, the agent must wear a dust-mask as well as gloves and a lab coat.
 - Cleaning: The inside of grinders and food processors will be cleaned and sterilized after each batch is processed. This is accomplished using lab wipes to wipe out any remaining resinous material and then cleaning and sterilizing in the high temperature washer/sanitizer.
- Grinding: Sufficiently dried material will be ground to the consistency of fine coffee grinds, using a (designated) large food processor or botanical chopper. Once the material is ground to proper specification, it will be stored in large 6-inch, stainless steel pans with stainless steel lids with appropriate labeling regarding batch information.
 - Safety: If trim or plant material is handled in the Bud's Goods facility, the agent must wear a dust-mask, as well as gloves and a lab coat.
 - Cleaning: The inside of grinder or food processor, along with its blade, will be cleaned and sterilized after each batch is processed. This is accomplished using lab wipes to wipe out any remaining resinous material, prior to cleaning and sterilizing in the high temperature washer/sanitizer. The grinder/food processor body will be wiped down with lab wipes after each batch. The steel pans will be cleaned and sterilized after each batch is processed. This is accomplished using lab wipes to wipe out any remaining resinous material, and then cleaning and sterilizing in a high temperature washer/sanitizer.
- Packing Supercritical CO2 Extractor: The retaining bolts will be taken off the extraction vessel, the lid lifted up, and the provided funnel put in its place. The agent will fit 12-15lbs into the 20L vessel. The material to be processed will be packed lightly into the vessel using the provided plunger. Once full, the lid will be closed, and the extractor vessel bolts replaced using the provided torque wrench.

- Safety: The agent will make sure vessel pressures are all 0psi. Using the User Interface, the agent will select “Open Extractor Vessel” from the maintenance screen, prior to removing the extractor vessel bolts. Packing of the column will be done in small increments and never too hard. Any time trim or plant material is handled in the Bud’s Goods facility, the agent must wear a dust-mask, as well as gloves and a lab coat.
- Cleaning: The agent will vacuum all of the processed material out of the extraction vessel using a (dedicated) shop vac. The outside of the SCCO2 extractor will be cleaned using sanitizing wipes. Running the machine empty overnight will suitably clean and sterilize the inside of the machine.
- Running SCCO2 Extractor:
 - Safety: The machine has a number of built-in safety features in the event of over-pressure runs or solvent leakage. In the event that the machine is unable to recover CO2, slowly vent the CO2 from valve 10 at the bottom of separator #2 and evacuate the Bud’s Goods facility until CO2 is completely vented. The provided ventilation in the Bud’s Goods facility will remove all CO2 and replace it with fresh air from outside the building.
 - Cleaning: All solvent lines will be cleaned out with acetone. Such cleaning will be performed under the closed lab fume hood so as not to release solvent vapors into the room. Once a week, the machine will be run empty, thoroughly cleaning the machine.
- Spin on Hotplate/Freeze:
 - Safety: The hotplate will continue to stay hot for some time even after it is turned off. The readout will read “HOT” until the plate is sufficiently cooled. Do not touch the hotplate when it is running or when the readout reads “HOT.”
 - Cleaning: The hotplate should be wiped down with a lab wipe after every use. If heavier cleaning is needed, wipe the plate down with denatured alcohol.
- Soak in Hot Ethanol:
 - Safety: Ethanol must be heated under the hood. When removing ethanol from the hood, a solvent respirator must be worn by the lab agent to prevent hot fumes from being inhaled. Caution must be taken when pouring, as the liquid is hot.
 - Cleaning: Cleaned with acetone and sanitized in the sanitizing dishwasher.
- Filtering:
 - Safety: The cold trap must remain full of dry ice at all times to prevent contamination of ethanol into the vacuum pump.
 - Cleaning: Replace used filters with new filters for each batch. Pass hot ethanol through the funnel to clean the filter. Sanitize in the sanitizing dishwasher.
- Removal of Ethanol in Rotary Evaporator:
 - Safety: The agent should use caution not to fill the boiling flask of the rotary evaporator more than halfway. The cold trap must remain full of dry ice at all times to prevent contamination of ethanol in the vacuum pump.
 - Cleaning: The boiling flask, receiving flask and vapor tube will be cleaned with acetone under the fume hood and sanitized in the sanitizing dishwasher.
- Decarboxylating: Decarboxylation or “decarbining” is the act of removing water from concentrate to aid in efficient distillation. To do this, the agent places a stainless-steel bain-marie or pot full of concentrate directly on to an induction burner. The concentrate should be heated quickly to a temperature of 180c then immediately removed from heat. At this point, the concentrate is fully decarboxylated.
 - Safety: The induction burner must be set up under the fume hood and the task performed with the hood closed.
 - Cleaning: Clean the bain-marie with acetone under the fume hood and sanitize in the sanitizing dishwasher. Wipe the induction burner down with a lab wipe.

- Fractional Distillation: The cold trap on the left will always be full of acetone/dry ice to prevent terpenes from contaminating the pump oil. The feeder will be filled with no more than 500ml of dewaxed/decarbed oil in order to reduce the risk of clogs.
 - Safety: Never run the still dry—there must be material flowing from the feeder before turning the motor on.
 - Cleaning: The still can be cleaned without being disassembled by running warm ethanol through under ambient pressure.

Definitions of Key Equipment

- Supercritical CO2 Extractor: A device used to extract cannabis oil from the plant matter. CO2 is used by Bud’s Goods, as it is the safest, most environmentally friendly solvent available to the industry. CO2 is warmed, pressurized, and pumped through a column of cultivated material. The CO2 “fluid” soaks into the plant matter to extract and concentrate only the cannabinoids, terpenes and other medicinally beneficial components. The CO2 is then recycled back into storage tanks for later use. As this is a “closed loop” system, no CO2 is vented from the machine, at any time.
- Fractional Distillation Still: The fractional distillation still is used to further purify the CO2 concentrate. During this process, the material is heated under reduced pressure and re-condensed and collected. The distilled concentrate is increased in purity and potency, resulting in a pharmaceutical-quality product suitable for human consumption.
- Rotary Evaporator: A rotary evaporator is used for cold recovery of ethanol in the purification process.
- Blast Chiller: A blast chiller is used to cryogenically freeze concentrate to keep it sterile, and to precipitate plant waxes and lipids for separation prior to distillation.
- Fume Hood: The fume hood is used as a safety measure when using solvent to clean lab glassware and utensils. All cleaning and soaking of glass and utensils will be done under the closed hood to prevent solvent fumes from being inhaled by agents.
- Vacuum Purge Oven: Used to desiccate material used prior to purification. Water removal is an important step in the purification process.

Standard Equipment

Standard equipment used in the Bud’s Goods facility may include the following:

- Supercritical CO2 Extractor
- Fractional Distillation Still
- Rotary Evaporator
- Blast Chiller
- 3-bay Sink
- Closed Lab Hood
- Sanitizing Dishwasher
- Vacuum Purge Oven
- Hand Washing Station
- Eye Washing Station
- 4 Burner Gas Range
- Double-Decker Convection Oven
- Reach in Freezer
- Reach in Refrigerator

Policies and Procedures Regarding Cleaning and Sanitization

Cleaning and sanitization are both important factors in producing sterile concentrates and food-safe marijuana products for distribution to customers in Massachusetts.

- Cleaning:

- Cleaning of all equipment, work surfaces, laboratory glassware and kitchen cookware can be challenging given the non-aqueous nature of cannabis concentrate. Often, strong solvents such as acetone must be used to chemically dissolve hard-to-clean cannabis concentrate. When acetone is used to clean surfaces, a solvent respirator must be worn to prevent inhalation of fumes. When acetone is used to clean lab glass and utensils, soaking must be done under the fume hood located in the Bud's Goods facility, at all times. Used solvent will be disposed of in the provided solvent-waste bin, which is only to be removed by a chemical waste disposal professional.
- All contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions.
- Equipment and utensils utilized in the Bud's Goods facility be so designed and of such material and workmanship as to be adequately cleanable.
- **Sanitization:**
 - Post cleaning sanitization is performed on all work surfaces, laboratory glassware, and kitchen cookware. The chlorine-based solution will be prepared each morning, using the following recipe:

Minimum concentration: 50ppm Range recommended: 50-100ppm. Do not exceed 200 ppm.	Amount needed per unit of water		
	per 2 quarts	per gallon	per 12 gallons
Use provided test strips. Check the temperature of the water for recommend temperature of 75-120 degrees Fahrenheit.	½ tsp.	1 tsp.	1/4 cup

- The sanitizing solution will be measured, tested, and placed into red sanitization bins and used to wipe down surfaces that will then air-dry.
- The third bay in the bay sinks will be filled with the solution, in order to soak utensils, cookware and labware, for a minimum of one (1) minute, and will air-dry.

Safety

All agents will complete mandatory safety training sessions. Bud's Goods agents and Bud's Goods management will have the following responsibilities when it comes to health and safety:

- **Bud's Goods Management:**
 - Ensure the health and safety of all agents.

- Correct any workplace conditions that are hazardous to the health and safety of agents.
- Inform agents about any remaining hazards.
- Make copies of the *Workers Compensation Act* and OSHA Regulations available by posting throughout the Facility.
- Ensure agents know their rights and responsibilities under OSHA Regulations and the Act and that they comply with them.
- Provide and maintain protective devices, equipment, and clothing, and ensure that agents use them.
- Provide agents with education, supervision, and training specific to equipment.
- Perform ongoing reviews and updates to policies and procedures as needed.
- Bud's Goods Agents:
 - Take care to protect health and safety and the health and safety of others who may be affected by individual actions.
 - Comply with all regulations and other legal requirements.
 - Follow established safe work procedures.
 - Use the required personal protective equipment.
 - Refrain from horseplay or similar conduct that may endanger others.
 - Ensure individual ability to work safely is not impaired by drugs or alcohol.
 - Report accidents and other incidents (including near misses) to the Production Manager.
 - Report the following to the Production Manager:
 - A hazard that might endanger Bud's Goods agents;
 - A problem with personal protective equipment or clothing; or
 - Any suggestions to improve workplace safety.

Bud's Goods Lab and Production Agent Health and Safety Program

Bud's Goods has identified eight basic components which have been identified to help prevent accidents and injuries from happening in the Bud's Goods facility, as well as to help deal effectively with any incidents that do occur. These components are:

- Hazard Identification & Risk Control—determine which hazards are present in the workplace and take steps to eliminate or minimize such hazard.
- Safe Work Procedures:
 - Dealing with wet surfaces;
 - Wearing proper personal protective equipment and clothing;
 - Handling solvents with use of protective gloves and proper ventilation; and
 - Using proper body mechanics when lifting heavy objects.
- Orientation, Education, Training & Supervision—properly prepare agents for job duties and ensure policies and procedures are consistently followed.
- Safety Inspections—regular safety inspections throughout the Bud's Goods facility, which will help identify workplace hazards so that they can be eliminated or controlled.
- Incident Investigation—determine cause of accident or injury and implement preventive measures.
- Health and Safety Meetings—regular meetings to provide an opportunity for agents and managers to communicate any concerns about health and safety.
- First Aid—determine what level of first aid is necessary on-site.
- Records & Statistics—maintain documentation to help identify recurring problems and ensure that hazardous conditions are corrected.

An annual Health and Safety Program review will be carried out to address current concerns.

Packaging and Labeling

Packaging of Marijuana and Marijuana Products

Bud's Goods will ensure that all marijuana products that are provided for sale to consumers will be sold in tamper or child-resistant packaging. To be in compliance with 935 CMR 500.105(6), Bud's Goods will ensure:

1. That to the extent it is not unreasonably impracticable for the specific type of product, marijuana products are packaged in containers that are:
 - a. Opaque and plain in design;
 - b. Resealable for any marijuana product intended for more than a single use or containing multiple servings; and
 - c. Certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging is in compliance with the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included at 16 CFR 1700; or
2. That where compliance with the requirements of tamper or child-resistant packaging is deemed by Bud's Goods to be unreasonably impracticable, marijuana products will be placed in an exit package that is:
 - a. Capable of being resealed and made tamper and child-resistant again after it has been opened;
 - b. Not able to be opened easily with scissors if appealing to children;
 - c. Includes the following statement, including capitalization, in at least ten-point Times New Roman, Helvetica or Arial font: KEEP OUT OF REACH OF CHILDREN; and
 - d. Is certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging is in compliance with the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included at 16 CFR 1700.

Packaging for marijuana products sold or displayed for consumers, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, will not be attractive to minors. Packaging is explicitly prohibited from:

1. Using bright colors that are "neon" in appearance;
2. Imitating or having a semblance to any existing branded consumer products, including foods and beverages, that do not contain marijuana;
3. Featuring cartoons;
4. Featuring a design, brand or name that resembles a non-cannabis consumer product of the type that is typically marketed to minors;
5. Featuring symbols or celebrities that are commonly used to market products to minors;
6. Featuring images of minors; and
7. Featuring words that refer to products that are commonly associated with minors or marketed to minors.

Packaging of Multiple Servings

Packaging for marijuana products sold or displayed for consumers in multiple servings will include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica or Arial, including capitalization: "INCLUDES MULTIPLE SERVINGS." Packaging for marijuana products in solid form sold or displayed for consumers in multiple servings will allow a consumer to easily perform the division into single servings. Edible marijuana products in a solid form will be easily and permanently scored to identify individual servings. Notwithstanding 935 CMR 500.105(6)(c)(2)(a), where a product is unable, because of its form, to be easily and permanently scored to identify individual servings, the product will be packaged in a single serving size. The determination of whether a product is able to be easily and permanently scored will be decided by the Commission consistent with sub-regulatory guidelines established by the Commission and provided to licensees. Packaging for marijuana product beverages will be packages solely in a single serving size. Multiple serving beverages are strictly prohibited for sale. Each single serving of an edible marijuana product contained in a multiple-serving package will be marked, stamped or otherwise imprinted with the symbol issued by the Commission

under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product. Serving size will be determined by Bud's Goods but in no instance will an individual serving size of any marijuana product contain more than five (5) milligrams of delta-nine tetrahydrocannabinol. Any marijuana product that is made to resemble a typical food or beverage product must be packaged and labelled as required by 935 CMR 500.105(5) and 500.105(6).

Prior to a marijuana product being sold at a marijuana establishment, Bud's Goods will submit an application, in a form and manner determined by the Commission, for packaging and label approval to the Commission.

Labeling of Edible Marijuana Products

Prior to edible marijuana products being sold or transferred, Bud's Goods will place a legible, firmly affixed label on which the wording is no less than one-sixteenth (1/16) inch in size on each edible marijuana product that it prepares for retail sale or wholesale, containing at a minimum the following information:

1. Bud's Goods' name and registration number, together with Bud's Goods' business telephone number, e-mail address, and website information, if any;
2. The name of the marijuana product;
3. Refrigeration of the product is required, as applicable;
4. Net weight or volume in US customary and metric units;
5. The quantity of usable marijuana contained within the product as measured in ounces;
6. The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;
7. A list of ingredients, including the full cannabinoid profile of the marijuana contained within the marijuana product, including the amount of delta-nine-tetrahydrocannabinol and other cannabinoids in the package and in each serving of a marijuana product as expressed in absolute terms and as a percentage of volume;
8. The serving size of the marijuana product in milligrams if the package is a multiple serving package;
9. The number of serving sizes within the marijuana product based on the limits provided in 935 CMR 500.150;
10. The amount, in grams, of sodium, sugar, carbohydrates and total fat per serving;
11. The date of creation and the recommended "use by" or expiration date which will not be altered or changed;
12. A batch number, sequential serial number and barcodes when used, to identify the batch associated with manufacturing and processing;
13. Directions for use of the marijuana product;
14. A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
15. A warning if nuts or other known allergens are contained in the product;
16. This statement, including capitalization: "The impairment effects of edible products may be delayed by two hours or more. This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN";
17. The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:



18. The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



Labeling of Marijuana Concentrates and Extracts

Prior to marijuana concentrates or extracts being sold or transferred, Bud's Goods will place a legible, firmly affixed label on which the wording is no less than 1/16 inch in size on each marijuana concentrate container that it prepares for retail sale or wholesale, containing at a minimum the following information:

1. Bud's Goods' name and registration number, together with Bud's Goods' business telephone number, e-mail address, and website information, if any;
2. The name of the marijuana product;
3. Product identity including the word "concentrate" or "extract" as applicable;
4. Net weight of volume expressed in US customary units and metric units;
5. The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;
6. A list of ingredients, including the full cannabinoid profile of the marijuana contained within the marijuana product, including the amount of delta-nine tetrahydrocannabinol and other cannabinoids in the package and in each serving of a marijuana product as expressed in absolute terms and as a percentage of volume, and the amount of specific additives infused or incorporated during the manufacturing process, whether active or inactive, including, but not limited to, thickening agents, thinning agents, and specific terpenes, expressed in absolute terms and as a percentage of volume, and in a form and matter determined by the Commission;
7. A statement of the serving size and number of servings per container or amount suggested for use based on the limits provided in 935 CMR 500.150;
8. The date of creation and the recommended "use by" or expiration date;
9. A batch number, sequential serial number, and barcode when used, to identify the batch associated with manufacturing and processing;
10. Directions for use of the marijuana product;
11. A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
12. A warning if nuts or other known allergens are contained in the product;
13. This statement, including capitalization: "This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.";
14. The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:



CONTAINS THC

15. The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



Labeling of Marijuana Infused Tinctures and Topicals

Prior to marijuana infused tinctures or topicals being sold or transferred, Bud's Goods will place a legible, firmly affixed label on which the wording is no less than 1/16 inch in size on each container of marijuana infused tincture or topical that it prepares for retail sale or wholesale, containing at a minimum the following information:

1. Bud's Goods' name and registration number, together with Bud's Goods' business telephone number, e-mail address, and website information, if any;
2. The marijuana product's identity;
3. The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;
4. A list of ingredients, including the full cannabinoid profile of the marijuana contained within the marijuana product, including the amount of delta-nine tetrahydrocannabinol and other cannabinoids in the package and in each serving of a marijuana product as expressed in absolute terms and as a percentage of volume;
5. Net weight or volume as expressed in US customary units or metric units;
6. The date of product creation;
7. A batch number, sequential serial number, and barcode when used, to identify the batch associated with manufacturing and processing;
8. Directions for use of the marijuana product;
9. A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
10. A warning if nuts or other known allergens are contained in the product;
11. This statement, including capitalization: "This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.";
12. The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:



CONTAINS THC

13. The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



In circumstances where the labeling of the marijuana product is unreasonable or impractical, Bud's Goods may include the labeling information on a peelback label or may place the product in a sealed bag with an insert or additional, easily readable label firmly affixed to that bag.

Additional Labeling and Packaging Requirements for Edible Marijuana Products

In addition to the requirements set forth in M.G.L. c. 94G, § 4(a½)(xxvi) and 935 CMR 500.105(5) and (6), Bud's Goods will ensure that the following information or statement is affixed to every container holding an edible marijuana product:

1. If the retail edible marijuana product is perishable, a statement that the edible marijuana product must be refrigerated;
2. The date on which the edible marijuana product was produced;
3. A nutritional fact panel that must be based on the number of THC servings within the container;
4. Information regarding the size of each serving for the product by milligrams, the total number of servings of marijuana in the product, and the total amount of active THC in the product by milligrams (mgs). For example: "The serving size of active THC in this product is X mg(s), this product contains X servings of marijuana, and the total amount of active THC in this product is X mg(s)."
5. A warning that the impairment effects of edible marijuana may be delayed by two hours or more.

Once a label with a use-by date has been affixed to a container holding an edible marijuana product, Bud's Goods will not alter that date or affix a new label with a later use-by date. Bud's Goods will ensure that each single serving of an edible marijuana product is physically demarcated in a way that enables a reasonable person to intuitively determine how much of the product constitutes a single serving of active THC. Each serving of an edible marijuana product within a multi-serving package of edible marijuana products must be easily separable in order to allow an average person 21 years of age or older to physically separate, with minimal effort, individual servings of the product. Each single serving of an edible marijuana product contained in a packaged unit of multiple edible marijuana product will be marked, stamped, or otherwise imprinted with a symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product.

Energy Standards

Bud's Goods will satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits, and other applicable approvals, including those related to water quality and solid waste disposal, and to use additional best management practices as determined by the Commission in consultation with the working group established under St. 2017, c. 55, § 78(b) to reduce energy and water usage, engage in energy conservation, and mitigate other environmental impacts.

Testing

1. No marijuana product, including marijuana, will be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. Testing of Bud's Goods' marijuana products will be performed by an Independent Testing

Laboratory in compliance with the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*, as amended in November 2016, published by the DPH. Testing of environmental media (e.g., soils, solid growing media, and water) will be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the DPH.

2. Marijuana shall be tested for the Cannabinoid Profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant-growth regulators, the presence of Pesticides and any additional testing required by the Commission.
3. Bud's Goods will have a written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1). Any such policy will include notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. In addition Bud's Goods' policy will include notifying the Commission of any information regarding contamination as specified by the Commission or immediately upon request by the Commission. The notification will be from both Bud's Goods and the Independent Testing Laboratory, separately and directly. The notification from Bud's Goods will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.
4. Bud's Goods will maintain the results of all testing for no less than one year. Testing results will be valid for a period of one year. Marijuana or Marijuana Products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, Transferred or otherwise conveyed until retested.
5. The sale of seeds is not subject to these testing provisions.
6. Clones are subject to these testing provisions but are exempt from testing for metals.
7. All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13).
8. All storage of marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 500.105(11);
9. All excess marijuana must be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to Bud's Goods for disposal or by the Independent Testing Laboratory disposing of it directly; and
10. No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.
11. Single-servings of Marijuana Products tested for potency in accordance with 935 CMR 500.150(4)(a) are subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).
12. Marijuana and Marijuana Products submitted for retesting prior to remediation will be submitted to an Independent Testing Laboratory other than the laboratory which provided the initial failed result. Marijuana submitted for retesting after documented remediation may be submitted to the same Independent Testing Laboratory that produced the initial failed testing result prior to remediation.

Recalls

Bud's Goods' policies and procedures for handling voluntary and mandatory recalls of marijuana products will be adequate to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by Bud's Goods to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety.

Product recalls may be initiated by the Commission or by Bud's Goods. In the event of a product recall, the following will transpire to ensure that all impacted consumers are promptly notified and such recalled product is destroyed:

- Knowing the product in question, determine the beginning and end dates in which product needs to be recalled (i.e. establish the recall period);
- Bud's Goods will then publicly post the nature of the recall on its website and at its facilities; and
- The recall will clearly explain the situation and instructions on returning the recalled product.

Consumers will return the recalled product to Bud's Goods and will be given the option of a refund or credit to be used during that visit. Destruction of the recalled product will occur pursuant to waste disposal requirements.

Destruction

Bud's Goods will have policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana product is segregated from other product and destroyed. Such procedures will provide for written documentation of the disposition of the marijuana products. The policies and procedures, at a minimum, will be in compliance with 935 CMR 500.105(12).

All outdated, damaged, deteriorated, mislabeled, or contaminated marijuana products will be stored prior to destruction in accordance with the following standards:

- a. Bud's Goods, for the purposes of storage, will provide adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110;
- b. Bud's Goods will have separate areas for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, until such products are destroyed;
- c. Bud's Goods storage areas will be maintained in a clean and orderly condition;
- d. Bud's Goods storage areas will be free from infestation by insects, rodents, birds, and pests of any kind; and
- e. Bud's Goods storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110.

All waste, including waste composed of or containing finished marijuana and MIPs, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. All exterior waste receptacles located on the Marijuana Establishment's Premises shall be locked and secured as to prevent unauthorized access.

- a. All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.
- b. Liquid waste containing marijuana or by-products of marijuana processing will be disposed of in compliance with all applicable state and federal requirements, including but not limited to, for discharge of pollutants into surface water or groundwater (Massachusetts Clean Waters Act, M.G.L. c. 21 §§ 26 through 53; 314 CMR 3.00: *Surface Water Discharge Permit Program*; 314 CMR 5.00: *Groundwater Discharge Program*; 314 CMR 12.00: *Operation Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Dischargers*; the Federal Clean Water Act, 33 U.S.C. 1251 *et seq.*, the National Pollutant Discharge Elimination System Permit Regulations at 40 CFR Part 122, 314 CMR 7.00: *Sewer System Extension and Connection Permit Program*), or stored pending disposal in an industrial wastewater holding tank in accordance with 314 CMR 18.00: *Industrial Wastewater Holding Tanks and Containers*.
- c. Organic material, recyclable material and solid waste generated at Bud's Goods will be redirected or disposed of as follows:
 - i. Organic material and recyclable material will be redirected from disposal in accordance with the waste disposal bans described at 310 CMR 19.017: *Waste Bans*.
 - ii. To the greatest extent feasible:

- I. Any recyclable material as defined in 310 CMR 16.02: *Definitions* will be recycled in a manner approved by the Commission; and
- II. Any Marijuana containing organic material as defined in 310 CMR 16.02: *Definitions* will be ground and mixed with other organic material as defined in 310 CMR 16.02: *Definitions* such that the resulting mixture renders the marijuana unusable for its original purpose. Once such marijuana waste has been rendered unusable, the mixture may be composted or digested at an aerobic or anaerobic digester at an operation that is in compliance with the requirements of 310 CMR 16.00: *Site Assignment Regulations for Solid Waste Facilities*.
- iii. Solid waste containing cannabis waste generated at Bud's Goods may be ground up and mixed with other solid waste at the Marijuana Establishment such that the resulting mixture renders the cannabis unusable for its original purpose. Once such marijuana has been rendered unusable, the resulting solid waste may be brought to a solid waste transfer facility or a solid waste disposal facility (e.g., landfill or incinerator) that holds a valid permit issued by the Department of Environmental Protection or by the appropriate state agency in the jurisdiction in which the facility is located.
- d. No fewer than two Bud's Goods agents must witness and document how the solid waste or organic material containing marijuana is handled on-site, including, but not limited to, the grinding up, mixing, storage and removal from Bud's Goods in accordance with 935 CMR 500.105(12). When marijuana products or waste is disposed or handled, Bud's Goods will create and maintain a written or electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Bud's Goods agents present during the disposal or other handling, with their signatures. Bud's Goods will keep these records for at least three years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

PRODUCT MANUFACTURING SAFETY PLAN

In accordance with 935 CMR 500.105(3)(c), Bud's Goods & Provisions Corp. ("Bud's Goods") will ensure that all edibles will be prepared, handled and stored in compliance with the sanitation requirements in 105 CMR 590.000: *State sanitary code chapter X: Minimum Sanitation Standards for Food Establishments*.

Agent Hygiene Practices

Bud's Goods agents will follow thorough hygienic practices and will maintain adequate personal cleanliness. All Bud's Goods agents will wash their hands thoroughly before starting work, and at any other time when hands may have become soiled or contaminated. Hand-washing facilities will be placed conveniently within the Bud's Goods facility and will be equipped with running water, effective hand-cleaning and sanitizing preparations, suitable drying devices, and sufficient storage for all cleaning and sanitation materials. All Bud's Goods agents will also wear food grade disposable gloves when handling marijuana and in the creation of marijuana products.

Any agent who, by medical examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion (e.g., boils, sores, infected wounds), or any other abnormal source of microbial contamination for which there is a reasonable possibility of contact with cannabis shall be excluded from any operations that may be expected to result in microbial contamination until the condition is corrected.

Food Material Practices

Food material used in the preparation of marijuana products will be acquired from an approved source. Any and all materials used in the production of marijuana products that can support the rapid growth of undesirable microorganisms will be stored in a manner that prevents the growth of such microorganisms,

such as proper refrigeration or other appropriate storage. All thermometers used in the storage and preparation of marijuana products will be tested regularly to ensure accuracy. All food products will be properly stored in their original containers and will be properly labeled. Only approved food additives will be used. Marijuana products and food products used in the production of marijuana products will be maintained in good condition and will be unadulterated.

Food Contact Surface Sanitation Practices

The Company recognizes the importance of properly washing, rinsing, and sanitizing food preparation equipment, utensils, and all surfaces that come into contact with food to reduce the number of bacteria, prevent the spread of bacteria, and eliminate the possibility of cross-contamination. Bud’s Goods will institute the following sanitation procedures in its commercial kitchen:

- Sanitizing solution should be used in the kitchen and other areas to sanitize food contact surfaces and utensils prior to use.
- All surfaces that come into contact with food will be washed, rinsed, and sanitized after each use, when an agent begins working with another type of food, anytime an agent is interrupted during a task and the tools or items they have been working with may have become contaminated, or at four-hour intervals if the areas or items are in constant use.
- Sanitizing solution will be stored in buckets or other containers such as a spray bottle and used with wiping cloths to sanitize prep tables, prep sinks, dining room tables, bar area, and working utensils; in the third compartment of a 3-compartment sink to sanitize all dishes that are washed; and use the final rinse in the dish machine to sanitize all dishes that are washed.
 - The chlorine-based solution will be prepared each morning, using the following recipe:

Minimum concentration: 50ppm Range recommended: 50-100ppm. Do not exceed 200 ppm.	Amount needed per unit of water		
	per 2 quarts	per gallon	per 12 gallons
Use provided test strips. Check the temperature of the water for recommend temperature of 75-120 degrees Fahrenheit.	½ tsp.	1 tsp.	1/4 cup

- The sanitizing solution will be measured, tested, and placed into red sanitization bins and used to wipe down surfaces that will then air-dry.
- The third bay in the bay sinks will be filled with the solution, in order to soak utensils, cookware and labware, for a minimum of one (1) minute, and will air-dry.

- Agents will ensure that all wiping cloths are soaked with sanitizer when cleaning food contact surfaces (like cutting boards, prep tables, slicers, etc.) and stored in sanitizer when not in use.
- Sanitizer buckets will be set up at all times in areas where food is being handled. Agents will check sanitizer solutions frequently to ensure that they are at the correct concentration, using the proper test strips for the type of sanitizing chemical that they are using.
- Sanitizer solutions will be changed as needed to properly sanitize food contact surfaces.
- Cleaning of all equipment, work surfaces, laboratory glassware and kitchen cookware can be challenging given the non-aqueous nature of cannabis concentrate. Often, strong solvents such as acetone must be used to chemically dissolve hard-to-clean cannabis concentrate. When acetone is used to clean surfaces, a solvent respirator must be worn to prevent inhalation of fumes. When acetone is used to clean lab glass and utensils, soaking must be done under the fume hood located in the Bud's Goods facility, at all times. Used solvent will be disposed of in the provided solvent-waste bin, which is only to be removed by a chemical waste disposal professional.
- Equipment and utensils utilized in the Bud's Goods facility be so designed and of such material and workmanship as to be adequately cleanable.

Training

All agents will complete mandatory safety training sessions. Bud's Goods agents and Bud's Goods management will have the following responsibilities when it comes to health and safety:

- **Bud's Goods Management:**
 - Ensure the health and safety of all agents.
 - Correct any workplace conditions that are hazardous to the health and safety of agents.
 - Inform agents about any remaining hazards.
 - Make copies of the OSHA Regulations and any workers compensation requirements available by posting throughout the facility.
 - Ensure agents know their rights and responsibilities under OSHA Regulations and the Commission's requirements and that they comply with them.
 - Provide and maintain protective devices, equipment, and clothing, and ensure that agents use them.
 - Provide agents with education, supervision, and training specific to equipment.
 - Perform ongoing reviews and updates to policies and procedures as needed.
- **Bud's Goods Agents:**
 - Take care to protect health and safety and the health and safety of others who may be affected by individual actions.
 - Comply with all regulations and other legal requirements.
 - Follow established safe work procedures.
 - Use the required personal protective equipment.
 - Refrain from horseplay or similar conduct that may endanger others.
 - Ensure individual ability to work safely is not impaired by drugs or alcohol.
 - Report accidents and other incidents (including near misses) to the manager on duty.
 - Report the following to the manager on duty:
 - A hazard that might endanger Bud's Goods agents;
 - A problem with personal protective equipment or clothing; or
 - Any suggestions to improve workplace safety.

Cleanliness & Sanitation Training:

Bud's Goods will combine its existing successful agent training program, supplemented with Commission rules and cannabis specific training to provide exhaustive training curricula to all agents. Bud's Goods' training will include USDA Good Handling Practices and Quality Systems, FDA Current Good Manufacturing Practices, and sickness or illness policies. Agents who handle cannabis will receive hygiene

training with specific attention to preventing microbial contamination. All employees will receive, at a minimum, the following quality assurance and contamination prevention training:

- USDA Good Handling Practices and Quality Systems, including but not limited to 21 CFR part 110.
- Product care, inspection, and maintenance techniques.
- Company policies which prohibit employees showing signs of illness, open wounds, sores, or skin infections from handling cannabis or materials that come into contact with cannabis.
- Hygiene training for employees who handle cannabis with specific attention to preventing microbial contamination.
- Handwashing requirements, including washing hands with soap and hot water before beginning work, after using the bathroom, and after meal breaks.
- Quality assurance procedures and consequences of failing to follow the company's established processes; and
- ServSafe certification training.

Bud's Goods Lab and Production Agent Health and Safety Program

Bud's Goods has identified eight basic components which have been identified to help prevent accidents and injuries from happening in the Bud's Goods facility, as well as to help deal effectively with any incidents that do occur. These components are:

- Hazard Identification & Risk Control—determine which hazards are present in the workplace and take steps to eliminate or minimize such hazard.
- Safe Work Procedures:
 - Dealing with wet surfaces;
 - Wearing proper personal protective equipment and clothing;
 - Handling solvents with use of protective gloves and proper ventilation; and
 - Using proper body mechanics when lifting heavy objects.
- Orientation, Education, Training & Supervision—properly prepare agents for job duties and ensure policies and procedures are consistently followed.
- Safety Inspections—regular safety inspections throughout the Bud's Goods facility, which will help identify workplace hazards so that they can be eliminated or controlled.
- Incident Investigation—determine cause of accident or injury and implement preventive measures.
- Health and Safety Meetings—regular meetings to provide an opportunity for agents and managers to communicate any concerns about health and safety.
- First Aid—determine what level of first aid is necessary on-site.
- Records & Statistics—maintain documentation to help identify recurring problems and ensure that hazardous conditions are corrected.

An annual Health and Safety Program review will be carried out to address current concerns.

When selling or otherwise transferring marijuana to another marijuana establishment Bud's Goods will provide documentation of its compliance with the testing requirements of 935 CMR 500.160: *Testing of Marijuana and Marijuana Products*, and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect marijuana products against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation.

Exhibit C: Employee Security

Bud's Goods will securely maintain personnel records, including registration status and background check records. Bud's Goods will keep, at a minimum, the following personnel records:

- Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
- A personnel record for each marijuana establishment agent;
- A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
- Personnel policies and procedures; and
- All background check reports obtained in accordance with 935 CMR 500.030.

Agent Personnel Records

In compliance with 935 CMR 500.105(9), personnel records for each agent will be maintained for at least twelve (12) months after termination of the agent's affiliation with Bud's Goods and will include, at a minimum, the following:

- All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- Documentation of verification of references;
- The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
- Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
- Documentation of periodic performance evaluations;
- A record of any disciplinary action taken;
- Notice of completed responsible vendor and eight-hour related duty training; and
- Results of initial background investigation, including CORI reports.

Personnel records will be kept in a secure location to maintain confidentiality and be only accessible to the agent's manager or members of the executive management team.

Agent Background Checks

- In addition to completing the Commission's agent registration process, all agents hired to work for Bud's Goods will undergo a detailed background investigation prior to being granted access to a Bud's Goods facility or beginning work duties.
- Background checks will be conducted on all agents in their capacity as employees or volunteers for Bud's Goods pursuant to 935 CMR 500.030 and will be used by the Director of Security, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.
- For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.030, Bud's Goods will consider:

- a. All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction.
- b. All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation. Juvenile dispositions will not be considered as a factor for determining suitability.
- c. Where applicable, all look-back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look-back period will commence upon release from incarceration.
- Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, Bud's Goods will:
 - a. Comply with all guidance provided by the Commission and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination.
 - b. Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802. In the event a Presumptive Negative Suitability Determination is made, Bud's Goods will consider the following factors:
 - i. Time since the offense or incident;
 - ii. Age of the subject at the time of the offense or incident;
 - iii. Nature and specific circumstances of the offense or incident;
 - iv. Sentence imposed and length, if any, of incarceration, if criminal;
 - v. Penalty or discipline imposed, including damages awarded, if civil or administrative;
 - vi. Relationship of offense or incident to nature of work to be performed;
 - vii. Number of offenses or incidents;
 - viii. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
 - ix. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained; and
 - x. Any other relevant information, including information submitted by the subject.
 - c. Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary Dissemination Log and 2.18: Adverse Employment Decision Based on CORI or Other Types of Criminal History Information Received from a Source Other than the DCJIS.

- All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the Commission.
- Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission.
- References provided by the agent will be verified at the time of hire.
- As a condition of their continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by Bud's Goods or the Commission.

Personnel Policies and Training

As outlined in Bud's Goods' Record Keeping Procedures, a staffing plan and staffing records will be maintained in compliance with 935 CMR 500.105(9) and will be made available to the Commission, upon request. All Bud's Goods agents are required to complete training as detailed in Bud's Goods' Qualifications and Training plan which includes but is not limited to Bud's Goods' strict alcohol, smoke and drug-free workplace policy, job specific training, Responsible Vendor Training Program, confidentiality training including how confidential information is maintained at the marijuana establishment and a comprehensive discussion regarding the marijuana establishment's policy for immediate dismissal. All training will be documented in accordance with 935 CMR 105(9)(d)(2)(d).

Bud's Goods will have a policy for the immediate dismissal of any dispensary agent who has:

- Diverted marijuana, which will be reported the Police Department and to the Commission;
- Engaged in unsafe practices with regard to Bud's Goods operations, which will be reported to the Commission; or
- Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.

Exhibit D: Storage

Bud's Goods will ensure that all marijuana and marijuana products are stored in compliance with 935 CMR 500.105(11). Specifically, Bud's Goods will ensure the following:

- The facility will have adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105: *General Operational Requirements for Marijuana Establishments* and 500.110: *Security Requirements for Marijuana Establishments*;
- The facility will have separate areas for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, until such products are destroyed,
- All storage areas will be maintained in a clean and orderly condition;
- All storage areas will be free from infestation by insects, rodents, birds, and pests of any kind; and
- All storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110 *Security Requirements for Marijuana Establishments*.

Per the requirements of 935 CMR 500.110, all finished marijuana products will be stored in a secure, locked safe or vault in such a manner as to prevent diversion, theft, and loss.

Furthermore, all safes, vaults, and any other equipment or areas used for the storage of marijuana or marijuana products, including prior to disposal, will be securely locked and protected from entry, except for the actual time required to remove or replace marijuana.

The storage of finished products will be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers, per the requirements of 935 CMR 500.105(3)(b)(15).

In accordance with 935 CMR 500.105(3)(c), Bud's Goods will comply with sanitary requirements. All edible products will be prepared, handled and stored in compliance with the sanitation requirements in 105 CMR 590.000: *State sanitary code chapter X: Minimum Sanitation Standards for Food Establishments*.

Exhibit E: Emergency Protocol

Bud's Goods promotes workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Policies and procedures include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan. In accordance with 935 CMR 500.105(3)(c), Bud's Goods will ensure that all edible products will be prepared, handled and stored in compliance with the sanitation requirements in 105 CMR 590.000: *State sanitary code chapter X: Minimum Sanitation Standards for Food Establishments*.

Agent Health and Safety Program

Eight basic components have been identified to help prevent accidents and injuries from occurring within the Facility, as well as to help deal effectively with any incidents that do occur. These components are:

- Hazard Identification & Risk Control—determine which hazards are present in the workplace and take steps to eliminate or minimize such hazard.
- Safe Work Procedures:
 - Dealing with wet surfaces;
 - Wearing proper personal protective equipment and clothing;
 - Handling solvents with use of protective gloves and proper ventilation; and
 - Using proper body mechanics when lifting heavy objects.
- Orientation, Education, Training & Supervision—properly prepare agents for job duties and ensure policies and procedures are consistently followed.
- Safety Inspections—regular safety inspections throughout the Facility, which will help identify workplace hazards so that Agents can be eliminated or controlled.
- Incident Investigation—determine cause of accident or injury and implement preventive measures.
- Health and Safety Meetings—regular meetings to provide an opportunity for agents and managers to communicate any concerns about health and safety.
- First Aid—determine what level of first aid is necessary on-site.
- Records & Statistics—maintain documentation to help identify recurring problems and ensure that hazardous conditions are corrected.

An annual Health and Safety Program review will be carried out to address current concerns.

Health and Safety Responsibilities

All agents will complete mandatory safety training sessions. Bud's Goods agents and Bud's Goods management will have specific responsibilities to ensure health and safety at the Bud's Goods facility:

Health and Safety Responsibilities for Bud's Goods Management:

- Ensure the health and safety of all agents;
- Correct any workplace conditions that are hazardous to the health and safety of agents;
- Inform Cultivation Technicians about any remaining hazards;

- Make copies of the *Workers Compensation Act* and OSHA Regulations available by posting throughout the Facility;
- Ensure agents know their rights and responsibilities under OSHA Regulations and the Act and that Agents comply with them;
- Provide and maintain protective devices, equipment, and clothing, and ensure that agents use them;
- Provide agents with education, supervision, and training specific to the Facility and equipment used to cultivate, process and manufacture marijuana and marijuana products; and
- Perform ongoing reviews of policies and procedures and update as needed.

Health and Safety Responsibilities for Bud's Goods Agents:

- Take care to protect individual health and safety and the health and safety of others who may be affected by individual's actions;
- Comply with all regulations and other legal requirements;
- Follow established safe work procedures;
- Use the required personal protective equipment;
- Refrain from horseplay or similar conduct that may endanger others;
- Ensure individual ability to work safely is not impaired by drugs or alcohol;
- Report accidents and other incidents (including near misses) to management; and
- Report the following to their supervisor:
 - A hazard that might endanger Bud's Goods agents;
 - A problem with personal protective equipment or clothing; and
 - Any suggestions to improve workplace safety.

Cleanliness & Sanitation Training

Bud's Goods will combine its existing successful agent training program, supplemented with Commission rules and cannabis specific training to provide exhaustive training curricula to all agents. Bud's Goods' training will include USDA Good Handling Practices and Quality Systems, FDA Current Good Manufacturing Practices, and sickness or illness policies. Agents who handle cannabis will receive hygiene training with specific attention to preventing microbial contamination. All employees will receive, at a minimum, the following quality assurance and contamination prevention training:

- USDA Good Handling Practices and Quality Systems, including but not limited to 21 CFR part 110.
- Product care, inspection, and maintenance techniques.
- Company policies which prohibit employees showing signs of illness, open wounds, sores, or skin infections from handling cannabis or materials that come into contact with cannabis.
- Hygiene training for employees who handle cannabis with specific attention to preventing microbial contamination.
- Handwashing requirements, including washing hands with soap and hot water before beginning work, after using the bathroom, and after meal breaks.

- Quality assurance procedures and consequences of failing to follow the company's established processes.

Agent Hygiene Practices

Bud's Goods' agents will follow thorough hygienic practices and will maintain adequate personal cleanliness. All Bud's Goods agents will wash their hands thoroughly before starting work, and at any other time when hands may have become soiled or contaminated. Hand-washing facilities will be placed conveniently within the Bud's Goods facility and will be equipped with running water, effective hand-cleaning and sanitizing preparations, suitable drying devices, and sufficient storage for all cleaning and sanitation materials. All Bud's Goods agents will also wear food grade disposable gloves when handling marijuana and in the creation of marijuana products.

Any agent who, by medical examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion (e.g., boils, sores, infected wounds), or any other abnormal source of microbial contamination for which there is a reasonable possibility of contact with cannabis shall be excluded from any operations that may be expected to result in microbial contamination until the condition is corrected.

Biological, Chemical and Physical Hazards

Bud's Goods will conduct a comprehensive hazard assessment to identify any physical and health hazards within the facility or on premises. The hazard assessment will evaluate all work areas or work situations, finding all potential hazards an employee may encounter while performing the job. The entire layout of the facility will be inspected and a summary recorded identifying any issues. The assessment will follow U.S. Department of Labor's OSHA Job Hazard Analysis guidelines (OSHA 3071). The Chief Operating Officer, in coordination with managers and the safety committee, will conduct the hazard assessment. The assessment will include, at minimum, identification of the following hazard sources:

- High temperatures that could result in injury, including burns, eye injury, ignition of equipment, or heat stress.
- Cold temperatures that could result in injury, including frostbite, lack of coordination, or cold stress.
- Harmful dust or particulates.
- Light radiation.
- Sources of falling objects, potential for dropping objects, rolling objects that could crush or pinch the feet.
- Sharp objects that may pierce the feet or cut the hands.
- Electrical hazards.
- Chemical exposure, including airborne or skin contact that would have the potential for splash on the skin or eyes, or the potential to breathe vapors or mists.
- Layout of the workplace and the location of employees to avoid collision with other employees or objects.
- Equipment that is malfunctioning, in poor condition, or in need of maintenance.
- Any other identified potential hazard.

The safety committee chair or a manager will complete and sign the PPE Hazard Assessment Certification. This certification will be kept with the Job Hazard Analysis log.

Any hazards identified as not properly controlled will be documented in the Job Hazard Analysis Log. The hazard will be abated immediately or as soon as possible by the appropriate personnel. Once abatement is complete, it will be documented in the Job Hazard Analysis Log.

Hazard Communication Plan

Bud's Goods' Hazard Communication policies and procedures shall ensure Bud's Goods is compliant with applicable Occupational Safety and Health Administration (OSHA) requirements and all applicable state and local laws, regulations, ordinances, and other requirements. All levels of supervision shall be held accountable for the safety of those employees under their direction. Copies of the Bud's Goods' Hazard Communication policies and procedures shall be given to all employees and be available for all to review, upon request.

Bud's Goods' Hazard Communication policies and procedures shall, at a minimum, address the following:

- Informing employees of hazardous chemicals used at Bud's Goods.
- Use of labels and other forms of warning.
- Use of Material Safety Data Sheets (MSDS).
- Procedure with respect to hazardous non-routine tasks.
- Maintaining a list of known hazardous chemicals used by employees and independent contractors.
- Communication of hazards.
- Training of employees and independent contractors.

Bud's Goods Facility Manager and the Chief Executive Officer shall maintain, review, and update the Hazard Communication policies and procedures and be responsible for:

- Implementation of the Bud's Goods' Hazard Communication policies and procedures.
- Ensure that OSHA records are maintained at all times.
- Train all Bud's Goods employees and visiting independent contractors.
- Provide documentation of all training and communications to the Human Resources Manager.

Personal Protective Equipment ("PPE")

Bud's Goods' personal protective equipment (PPE) policies and procedures have been developed to identify work situations that require the use of PPE and to determine the proper selection and use of PPE. PPE will be selected and used to protect employees from the hazards and potential hazards that they are likely to encounter. Employees will wear appropriate PPE at all times.

All managers, will implement all aspects of Bud's Goods' PPE policies and procedures, including:

- Understanding of the applicable federal, state and local laws, regulations, ordinances, and other requirements, as well as best practice safety standards.
- Reviewing hazard assessments to determine the need for PPE.
- Acquiring the correct PPE.

- Training employees on the use of PPE.
- In coordination with the Human Resources Manager, documenting and maintaining employee PPE training.
- Ensuring PPE is available, provided and documented.
- Conducting hazard specific training for the use of PPE.
- Establishing inspections, maintenance and replacement procedures to make sure damaged PPE is not used.

All Managers will:

- Ensure all employees wear the appropriate PPE.
- Ensure that all employees have completed PPE training.
- Contact the Chief Operating Officer when a hazard or process has changed which may render previously used PPE ineffective.
- Comply with PPE policies as required and support the PPE program as necessary.
- Participate in quarterly training for the use and maintenance of PPE.
- Replace all damaged PPE.

Employees will:

- Inspect PPE before use, and ensure proper maintenance.
- Wear all assigned PPE and conduct assigned tasks in a safe manner.
- Notify a manager when PPE is damaged and needs to be replaced.
- Participate in quarterly training for the use and maintenance of PPE.
- Comply with PPE policies as required and support the PPE program as necessary.

Assessment

For each hazard identified during the hazard assessment, PPE will be selected to protect the employee by creating a barrier against the workplace hazard. PPE will be selected to protect against any hazard that is present or likely to be present. PPE selections will be compliant with all applicable federal (excepting federal laws related to marijuana), state and local laws, regulations, ordinances, and other requirements.

All managers will choose PPE based on characteristics such as design, reliability, and suitability for the hazardous task. Managers will ensure the PPE selected offers a level of protection greater than the minimum required to protect employees from the identified hazards.

Upgraded PPE will be immediately provided if any change in facility status results in dangerous exposures to employees.

Fire Protection Plan

All Bud's Goods employees, supervisors, and managers are expected to follow the procedures outlined in this plan to ensure that employees and consumers are protected. The Facility Manager and the Chief Executive Officer are responsible for the control of accumulation of flammable or combustible waste materials. In addition, the Facility Manager is responsible for maintenance of equipment and systems installed to prevent or control ignitions of fires (ex. Fire Extinguishers, fire hoses, etc.)

All Bud's Goods will be trained on and are responsible for understanding the following Safe Code of Work Practices:

- Flammables, including data sheets, books, rags, clothing, flammable liquids or trash shall not be placed or stored near heaters or their vents, any electrical appliance, or other potential sources of ignition.
- Sources of actual or potential heat such as hot plates or electric coffee pots shall not be placed near flammable materials. Portable space heaters and candles are prohibited.
- Care must be taken not to block potential escape routes, particularly with flammable materials.
- Each individual is personally responsible for assuring that extension cords and multiple plugs are in good condition. Cords that are missing the grounding prong, are spliced together, or that are missing their protective sheath shall not be used.

Additionally, fire control measures installed or available in work areas include installed and monitored sprinkler systems, fire extinguishers and fire alarms systems. The Facility has numerous Fire Extinguishers throughout the facility.

Emergency Action Plan

The Bud's Goods emergency action plan serves to outline procedures for handling of emergency situations. This SOP shall apply to all employees. These protocols ensure the safety of all personnel in an emergency situation. The Compliance Officer will oversee policy compliance for personnel under his or her supervision. Facility managers are responsible for oversight of all the employees and all emergency procedures. All Bud's Goods employees will adhere to the policies and SOPs in this manual. All employees will have proper training in emergency preparedness as a condition of employment.

Response to a Medical Emergency

Medical problems may range from minor, isolated events such as a fall down the stairs to the significant events involving many people. All employees will be trained in the following responses to medical emergencies:

- They should assess the situation.
- If the person is conscious, Agents should ask him or her to tell them if anything hurts. If unconscious, Agents should gently inspect the person for obvious signs of injury.
- Agents should not move the person (especially if he or she indicates any pain) unless Agents are in imminent danger of further injury, e.g., an approaching fire.
- Agents should ask someone else to call 911 if Agents are helping an injured person.
- Agents should also call the manager if he or she is not present and inform them of the situation, the location, etc.
- Agents may render first aid if Agents are knowledgeable and willing, but if possible should

wait for qualified personnel to deliver medical attention.

- Agents should ask someone else to recover the first aid kit to utilize during the emergency and avoid coming in contact with blood, vomit, or other bodily fluids without the use of rubber gloves.
- Agents should not provide or administer any medicines and defer to emergency personnel once Agents arrive.
- Agents should limit their conversation with the person to reassurances and not discuss their injury, the accident, or what circumstances might have contributed to its cause, if possible.
- After the person has been given first aid and the incident is over, Agents should provide police or other emergency personnel with any details that Agents know.
- After the medical emergency is over, the injured person, witness, and/or supervisor should formally document the incident and maintain a record of it.

Response to a Fire Emergency

- Activate nearest fire alarm (if installed)
- Notify the local fire department by calling 911
- If no fire alarm is available notify on-site personnel via:
 - Voice communication
 - Phone paging
 - Radio
- Fight the fire ONLY if:
 - The fire department has been notified
 - The fire is small and not spreading to other areas
 - Escaping the area is possible by backing up to the nearest exit
 - The fire extinguisher is in working condition and personnel are trained to use it
- Upon being notified of a fire emergency, occupants must:
 - Leave the building using designated escape routes
 - Assemble in the designated area
 - Remain outside until the competent authority (Designated Official or designee) announces that it is safe to re-enter.
- The Compliance Officer shall designate employees as emergency responders who shall:
 - Disconnect utilities and equipment unless doing so jeopardizes his/her safety
 - Coordinate an orderly evacuation of personnel
 - Perform an accurate headcount of personnel reported to the designated area
 - Determine a rescue method to locate missing personnel
 - Provide fire department personnel with the necessary information about the facility

Extended Power Loss

In the event of an extended power loss to this facility, precautionary measures should be taken including but not limited to:

- Unnecessary electrical equipment and instruments should be turned off if power restoration causes a surge that could damage electronics and sensitive equipment.

If the power loss causes freezing temperatures within the building the following measures should be taken:

- Emergency eyewash station should be drained of water to avoid freezing and cracking of pipes.
- Equipment that contains fluids that can freeze due to long-term exposure should be drained of all such fluids.
- Propylene-glycol may be added to drains to prevent traps from freezing.

Upon restoration of power (and heat):

- Electronic equipment should be brought up to ambient temperatures before energizing to prevent condensate from forming in circuitry.
- Water pipes should be checked for leaks after heat has been restored to prevent flooding.

Chemical Spill

Spill containment and equipment to secure the area is located in the spill containment kit. Personal Protective Equipment (PPE) is located on supply shelves. Safety Data Sheets (SDS) are available online and printed versions are located in the Fertigation department, the Lab, and the Trim hallway.

When a large chemical spill (>4L) has occurred:

- Immediately notify the designated official and the emergency coordinator.
- Wear proper PPE such as gloves and eye protection.
- Contain the spill with available equipment (e.g. pads, brooms, absorbent powder, etc.)
- Secure the area and alert other personnel on site.
- Do not attempt to clean the spill up unless otherwise trained to do so.
- If anyone is injured, alert medically trained staff and call 911, if necessary.
- Call local spill cleanup company or fire department to perform cleanup on spill or for hazardous chemicals such as mercury.
- Evacuate building as necessary.
- In the event the spill is greater than 4L, the fire department or local spill cleanup company should be notified immediately.
- Dispose of all marijuana waste in a manner that is in accordance with the SDS and Disposal SOPs.

When a small chemical spill has occurred (<4L):

- Notify the emergency coordinator and/or supervisor.
- If toxic fumes are present secure the area to prevent other personnel from entering.
- Deal with spill in accordance with instruction in SDS.
- Wear proper PPE such as gloves and eye protection.
- Dispose of all waste in a manner that is in accordance with the SDS and Disposal SOPs.

Bomb Threat

In the event of a bomb threat made in person or over the phone:

- Be calm and listen,
- Do not interrupt the caller,
- Record your name, time, and date,
- Record the following about the caller's identity:
 - Sex (Male or female)
 - Adult or juvenile
 - Origin of call (local, long distance, telephone booth):
 - Voice characteristics: loud/soft, high pitch/deep, raspy/pleasant, intoxicated, other
 - Accent: local/not local, foreign/regional, race
 - Speech: fast/slow, distinct/distorted, stutter/slurred/nasal
 - Manner: calm/angry, rational/irrational, coherent/incoherent
deliberate/emotional, righteous/laughing
 - Language: excellent, good, fair, poor, foul
 - Background noises: factory, trains, machines, animals, music, quiet, office,
voices, airplanes, street, party, traffic, atmosphere
- If told, record all the following facts:
 - When will it go off
 - Where is it located
 - What kind of bomb
 - What kind of package
- While on the phone or handling the person deploy the silent alarm button nearest your position.
- If the threat is made by phone, signal personnel to evacuate the facility immediately.
- As soon as possible call 911 and all company emergency contacts.

Flood

- Stay calm and await instructions from designate emergency personnel or first responders.
- Shut down all utilities and equipment if it is safe to do so.
- Follow the recommended primary or secondary evacuation routes.

Blizzard

- Stay calm and await instructions from designate emergency personnel or first responders.
- Stay indoors.
- If there is no heat:
 - Close off unneeded rooms or areas
 - Stuff towels or rags in cracks under doors
 - Cover windows
 - Eat and drink. Food provides the body with energy and heat. Fluids prevent dehydration.
 - Wear layers of loose-fitting, lightweight warm clothing, if available.

Armed Robbery

All employees will be trained on how to respond to an armed robbery. Agents will receive initial training as a component of onboarding, re-fresher training annually and as needed throughout the year:

- 1) If a firearm is displayed, Agents should assume it is real and loaded.
- 2) Agents should not do anything that would jeopardize their safety or the safety of others.
- 3) Agents should remain calm and not make any sudden moves. If Agents must put their hands into a pocket or make any other moves, explain the action before doing it. If the robber(s) have a weapon, they will likely use it if provoked.
- 4) Agents should activate alarms ONLY if Agents can do so safely and without detection.
- 5) Agents should follow the directions of the robber(s), but not volunteer to anything more than asked.
- 6) If the robber hands them a note, Agents should drop it on the floor or place it out of sight to retain as evidence.
- 7) Agents should study the robber(s) as carefully as possible without being obvious, noting height, weight, race, age, clothing, jewelry, sex, speech characteristics, scars, tattoos, physical characteristics, gait, and method of operation.
- 8) Agents should note the number of accomplices and where they stood, paying special attention to the way the robbers address each other because under stress, they may use real names.
- 9) Agents should note the type of weapon used by the robber and where he or she carried it.
- 10) Agents should note the direction in which the robber(s) departed and how they carried the money or cannabis away (sack, bank bag, etc.).
- 11) Agents should try to remember exactly what the robber(s) said.
- 12) Agents should prioritize their safety and the safety of others because money or cannabis can be recovered or replaced but a life cannot.

After an armed robbery, any employee can call 911 to report the robbery and provide their name and location. Agents should not leave the phone until they have answered all of the operator's questions. If injury occurred, Agents should advise the police if an ambulance is needed. The person who actually dealt with the robber(s) should be near the person designated to telephone the police to assist in answering any questions.

As soon as the robbery has been reported to the police, the employees should lock all doors, ask all witnesses to remain, and allow no one to enter until officers arrive. Agents should not touch anything. All persons who dealt with the robber or were present during the robbery should immediately begin writing all they can remember of the incident but not discuss the robbery with anyone until after Agents have given their information to the police.

Active Shooter

The U.S. Department of Homeland Security defines an active shooter as "an individual actively engaged in shooting or attempting to shoot people in a confined and populated area." Bud's Goods will teach all employees the DHS-recommended procedures of Run.Hide.Fight. if they find themselves in an area with an active shooter:

- 1) **Evacuate (RUN):** If employees are in the building where an active shooter is present, they should look and listen for indications of where the threat is. If they see people fleeing from a particular area, they know that the threat is in that area and could be coming toward them. They can try to evacuate the building if the nearest route is away from the active shooter or move to

a room that can be locked (safe room). If they cannot evacuate or move to a safe room, they should move away from the threat and away from the noise and commotion.

- 2) **Lockdown and Shelter-in-Place (HIDE):** If they cannot safely evacuate the area, the best option is for the employees to find a room with a door that locks from the inside. If the door does not lock, they should barricade it with large heavy objects such as desks, tables, file cabinets, furniture, and books to make entry as difficult as possible. They should locate an area with ballistic cover, not just visual concealment, because cover stops and slows bullets while concealment does not. If for some reason the employees are caught in an open area such as a hallway or reception area, they can try to hide, remain as quiet and calm as possible, or “play dead” to avoid detection.

Employees should also:

- Cover windows and draw blinds
- Turn off radios and computer monitors
- Keep out of sight
- Silence cell phones and remain as quiet as possible

Confront the Shooter (FIGHT): If the employees come face to face with the assailant, as a last resort and because no single procedure can be recommended in this situation, they should attempt to quickly overpower the individual with force in the most violent manner possible. If the employees are with other people they should work as a collective group to overcome the shooter by yelling “Gun!”, throwing items at the shooter’s head to distract him or her, grabbing the weapon, or holding the shooter for police. They should remember that in most cases, the attacker will continue to shoot victims unless he or she is stopped.

Emergency Training

Bud’s Goods will prioritize frequent training so all employees are familiar with the contents of the emergency management plan. Bud’s Goods will plan and schedule the emergency exercises to minimize disruption of normal business operations and maximize participation of employees and management. Due to the severity of many emergencies, Bud’s Goods will conduct semiannual emergency training exercises including bomb threat, fire, active shooter, armed robbery, and medical emergency drills and maintain a record of all training, noting any issues during these drills, so that solutions will be implemented before the next drill. Training will include the emergency evacuation plan, including regular evacuation drills that practice varying escape routes in the event the designated evacuation route is not available.

Exhibit F: Prevention of Diversion

Bud's Goods' operating policies and procedures ensure prevention of diversion, theft, and illegal or unauthorized conduct pursuant to the Commission's Adult Use of Marijuana regulations codified in 935 CMR 500.000. Considerations regarding diversion prevention measures include, but are not limited to, marijuana establishment agent and consumer accountability, and identifying, recording, and reporting diversion, theft, or loss. Marijuana in the process of transport, analysis, or retail sale is to be stored and tracked in a manner that prevents diversion, theft, or loss.

More specifically, diversion measures include policies and procedures requiring that:

- Employees are made aware of crime prevention techniques pursuant to 935 CMR 500.105(1)(b).
- Any marijuana establishment agent who has diverted marijuana will be immediately dismissed, which will be reported to law enforcement and to the Commission pursuant to 935 CMR 500.105(1)(m).
- All employees involved in the handling and sale of marijuana for adult use will complete a responsible vendor training program with a curriculum covering diversion prevention and prevention of sales to minors and will comply with all other marijuana establishment agent training requirements under 935 CMR 500.105(2).
- Display samples of each product offered for sale will be displayed in secure, locked cases, subject to the requirements of 935 CMR 500.110.
- Bud's Goods will only engage in reasonable marketing, advertising, and branding practices that do not promote the diversion of marijuana and that comply with all other marketing and advertising requirements under 935 CMR 500.105(4).
- Warning statements required by the Commission's regulations will be affixed to all applicable products, and Bud's Goods' labels will comply with all other labeling of marijuana and marijuana products requirements under 935 CMR 500.105(5).
- Tamper or child-resistant packaging will be used for applicable marijuana products, and Bud's Goods' products will comply with all other packaging of marijuana and marijuana products requirements under 935 CMR 500.105(6).
- Bud's Goods will maintain real-time inventory and will track and tag all marijuana seeds, clones, plants, and marijuana products, using Metrc as the seed-to-sale methodology in a form and manner to be approved by the Commission.
- Records will be kept for inventory, seed-to-sale tracking for all marijuana products, personnel (including documentation of the completion of required training), and waste disposal, and Bud's Goods will comply with all other record keeping requirements under 935 CMR 500.105(9).
- Marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, will be stored in a separate area, until such products are destroyed; and Bud's Goods will comply with all other storage requirements under 935 CMR 500.105(11).
- Two or more marijuana establishment agents will witness and document how the marijuana waste is disposed or otherwise handled, and Bud's Goods will comply with all other waste disposal requirements under 935 CMR 500.105(12).
- All transported marijuana products will be linked to Metrc; all vehicles transporting marijuana will be staffed with a minimum of two marijuana establishment agents; and any

vehicle accidents, diversions, or other reportable incidents that occur during transport will be reported to the Commission and law enforcement within 24 hours. Bud's Goods will comply with all other transportation requirements under 935 CMR 500.105(13).

- All security requirements under 935 CMR 500.110 will be followed, including:
 - Implementing sufficient safety measures to deter theft of marijuana and marijuana products and prevent unauthorized entrance into areas containing marijuana and marijuana products at Bud's Goods' adult-use marijuana establishment location to protect the premises, employees, Bud's Goods' agents, consumers, and the general public;
 - Adopting procedures to prevent loitering and to ensure that only individuals engaging in activity expressly or by necessary implication permitted by the Commission's regulations and its enabling statute are allowed to remain on the premises;
 - Storing all finished marijuana products in a secure, locked safe or vault in such a manner as to prevent diversion, theft, and loss;
 - Restricting access to employees, agents or volunteers specifically permitted by Bud's Goods, agents of the Commission, state and local law enforcement and emergency personnel, and all other limited access areas requirements under 935 CMR 500.110(4);
 - Implementing an adequate security system to prevent and detect diversion, theft or loss of marijuana, notifying law enforcement and the Commission within 24 hours of a diversion, theft or loss of any marijuana product, and all other security and alarm requirements under 935 CMR 500.110(5); and
 - Obtaining, at Bud's Goods' own expense, a security system audit by a vendor approved by the Commission, and all other security audits requirements under 935 CMR 500.110(10).

**Zoning Board of Appeals
Lakeville, Massachusetts
Minutes of Meeting
October 21, 2021
Remote meeting**

On October 21, 2021, the Zoning Board held a remote meeting. It was called to order by Chairman Olivieri at 7:00 p.m. LakeCam was recording, and it was streaming on Facebook Live.

Members present:

John Olivieri, Jr., Chair; Jeffrey Youngquist, Vice-Chair; Nora Cline, Clerk; Gerald Noble, Vice-Clerk; Chris Carmichael, Member; Christopher Sheedy, Associate

Others present:

Donna DeCost and Jefferson Crafford, applicants

Agenda item #1

Mr. Olivieri read this item into the record. It was an explanation of how the provisions of Chapter 20 of the Acts of 2021 allowed the Board to continue to meet remotely.

DeCost hearing – 129 Staples Shore Road

Mr. Olivieri opened the DeCost hearing at 7:00 p.m. and read the legal ad into the record. Mr. Youngquist recused himself from the hearing. Mr. Olivieri advised that Mr. Sheedy would be participating. Ms. DeCost advised they are hoping to be able to construct a second floor on the existing garage by raising the roof. This would allow for them to have storage space.

Mr. Olivieri asked if there would be heat in that second floor. Ms. DeCost said there would not be. Mr. Olivieri then read the October 18, 2021, memo from the Board of Health into the record. The Board of Health had no objection to the addition as long as the room remained unheated so that it could not be considered an additional bedroom. The October 18, 2021, email from the Conservation Commission stated that any work or storage of work-related materials would require the submission of an RDA.

Mr. Carmichael asked if the garage was attached. Ms. DeCost replied it was detached and located across the street on a separate lot. Mr. Carmichael noted that he did not think it was within their purview to control whether the addition was heated or not, but they could make it non-habitable in a condition. He also wanted to confirm that they were not changing the footprint. Ms. DeCost said they were not.

Mr. Carmichael then made a motion, seconded by Mr. Sheedy, to grant the petition with the following condition:

1. The space above the garage will be for storage and non-habitable.

Roll Call Vote: Ms. Cline-Aye, Mr. Sheedy-Aye, Mr. Noble-Aye, Mr. Carmichael-Aye, Mr. Olivieri-Aye

Ms. Murray explained the timing of the filings, the appeal period, etc.

The hearing closed at 7:08.

Documents distributed for the hearing:

Petition packet

Legal ad

Board of Health correspondence of October 18, 2021

Conservation Commission email of October 18, 2021

Bud's Goods & Provisions Corp. hearing – 475 Kenneth W. Welch Drive

Mr. Olivieri opened the Bud's Goods & Provisions Corp. hearing at 7:09 p.m. and read the legal ad into the record. He stated he believed there were still some housekeeping items for this petition that needed to be addressed. He then read the October 21, 2021, email from the applicant's counsel requesting a continuance until the next Zoning Board meeting.

Mr. Youngquist then made a motion, seconded by Mr. Carmichael, to continue the petition. Mr. Youngquist amended his motion to include the new date of November 18, 2021, at 7:00 pm. Mr. Carmichael seconded the amended motion.

Roll Call Vote: Ms. Cline-Aye, Mr. Youngquist-Aye, Mr. Noble-Aye, Mr. Carmichael-Aye, Mr. Olivieri-Aye

The hearing closed at 7:12.

Approve meeting minutes

Mr. Noble made a motion, seconded by Mr. Youngquist, to approve the meeting minutes from the August 19, 2021, meeting.

Roll Call Vote: Mr. Sheedy-Aye, Mr. Youngquist-Aye, Mr. Noble-Aye, Mr. Carmichael-Aye, Mr. Olivieri-Aye, Ms. Cline-Abstain

Old Business – Sign bylaw update or discussion

Mr. Olivieri said if anybody had any questions or comments, they should be sent over to Ms. Murray to be forwarded to the Planning Board.

New Business

There was no new business.

Adjourn

Ms. Cline made a motion, seconded by Mr. Youngquist, to adjourn the meeting.

Roll Call Vote: Ms. Cline-Aye, Mr. Sheedy-Aye, Mr. Youngquist-Aye, Mr. Noble-Aye, Mr. Carmichael-Aye, Mr. Olivieri-Aye

Meeting adjourned at 7:14.