



We are **Legal Cannabis for Consumer Safety (LCCS)**, a coalition representing California's largest licensed cannabis growers, manufacturers, associations, retailers, testing labs, advocates, and marketplaces. LCCS is committed to understanding the causes of lung illnesses associated with vaping—also referred to as EVALI or VAPI—and implementing fact-based actions to address these issues and ensure consumer health and safety.

LCCS Recommends the following course of action to promote public safety and consumer health as it relates to vaping products.

1. **Take action to shut down illicit retail.** Studies indicate over 3,000 illicit retail dispensaries are still operating in California. These retailers sell products that are not licensed, not tested, and do not adhere to important public safety standards. We believe swift action should be taken to curtail this activity. Specifically:
 - a. Approve the Assembly Budget proposal for an additional \$10 million to enforcement against unlicensed retail activity.
 - b. Shut down illicit retail still operating in California. Swift enforcement actions aimed at shutting down illicit operators would reduce unsafe products on the market and sharply reduce public health and consumer safety risks.

2. **Strengthen ingredient regulations and labeling requirements.** The legal cannabis marketplace already adheres to a number of product labeling and ingredient requirements. However, both can be strengthened to increase consumer safety. Specifically:
 - a. **Improve ingredient regulations.** Regulations must expressly ban the use of additives, cutting agents, and artificial flavoring known to be harmful, including but not limited to Vitamin E Acetate (VEA), propylene glycol (PG), polyethylene glycol (PEG), and vegetable glycerin (VG), in all cannabis products. To the extent that the State of California considers any ingredients to be safe for inhalation and acceptable as additives, they should be identified explicitly and permitted.
 - b. **Enforce existing product labeling requirements.** Currently, all cannabis products must include “a list of all product ingredients in descending order of predominance by weight or volume” (CDPH Reg. Section 40408(a)(5)). Retailers shall actively reject transfers of cannabis products missing an ingredient list or other required labeling.

3. **Enhance device security.** Issue standards for heavy metal testing of hardware. Existing standards like RoHS (Restriction of Hazardous Substances Directive) should be the bare minimum, but more stringent material purity standards should be issued in line with the BCC's heavy metal standards currently being applied to cannabis concentrates. Approved hardware should be manufactured according to cGMP, at an ISO 13485 certified manufacturing facility using food grade materials for any oil-touching components and mouth pieces.