



NATIONAL ASSOCIATION OF CANNABIS BUSINESSES

Vermont Compliance & Enforcement Sub-Committee

Discussion Guide for

10/07/21



Agenda / Discussion Guide

- 11:00am Call to Order
 - Approval of minutes from 10/1/21 and 10/4/21 meetings
- 11:05am Review outdoor cultivation and retail security options
- 11:45am Next steps
- 11:50am Public Comments
- 12:00pm Adjourn

Agenda Item: Exclusive Licenses

Security Considerations for Outdoor Cultivation

Common Outdoor Security Features

- Fencing the perimeter of all outdoor cannabis cultivation sites
 - 8-foot-high chain link fences and gates with secure locks are common
- Video surveillance system with unobstructed view of areas where cannabis is handled
- Monitoring and secure storage of video recordings
- Functional alarm system
- Motion-activated floodlights at each access point
- Timely reporting of theft or losses to regulatory authority

Possible Alternatives to Standard Outdoor Security Features

- Instead of fences ... Video Surveillance System
- Rather than Video Surveillance ... Motion Activated Lights and Alarm
- Instead of Fences and Electronic Devices ... **locate your crop out of view from roads and other public areas**
- Your cannabis crop is in greatest danger of theft during the last 3 weeks prior to harvesting.
 - Recommendation: Reduce expenses by hiring security or increasing your own surveillance during this period only.



Home Grown

- Little to no cannabis and hemp theft has been reported with the passing of “home grown”
- Residents are allowed to have 6 plants
 - 2 mature (flowering plants)
 - 4 immature
- Access must be limited to those 21 and older, permission from cultivator and no public view
- Cannabis clones are readily available to the public
- The above may pose less-risk for theft from commercial cultivators

Theft data given by the Vermont Dept of Agriculture David Huber & Cary Giguere

Medicinal program – Outdoor Cultivation

- Currently outdoor cultivation is allowed for medicinal program
- Companies are allowed to secure plants at their own discretion (they may choose)
 - *Patient Alliance*
 - Plastic greenhouse compost facility
 - Locked plastic barrier
 - *Southern Vermont Wellness*
 - Grow facility behind brick and mortar, fenced
 - Crop is visible from opposite building
 - No lighting
 - No video surveillance
 - Minor issue of shrinkage/theft
 - No theft issues since “home grown” is allowed

Theft data given by the Vermont Dept of Agriculture David Huber and Gary Giguere
10/6/2021

Hemp Program

- No rules regarding crop security
- Crop locations are protected as they are not public
 - Not public knowledge but, requests can be made to see records
- Theft happened prior to “home grown” - no incidents since
- Current hemp theft was non-cultivator (home grown)

Theft data given by the Vermont Dept of Agriculture David Huber and Cary Giguere

Small Cultivators –1000 sq ft

- Least restrictive security guidelines
- Adhere to blocked view access of cannabis crop from public areas/street
- If located in back of house/dwelling/etc – naturally safe-guarded
- Private/limited land access
- “Hidden by landscape”
- Due to *liberal access to and minimal restrictions of firearms*, it is widely known in the state that an owner may be armed
- Outdoor cannabis appears to be the “lesser sought after of plants” than in-door plants
- Due to size, an owner will easily be able to see all corners of the crop (all 4 corners)
- Security is most needed approximately 3 weeks prior to harvest
 - Recommend physical presence on-sight with an attendant or security service

Security for Outdoor Cultivation - All

Recommendation 1

- 8ft high chain-link fences
- Gates with secure locks
- Video surveillance system with unobscured views of areas
 - Monitoring and secure storage of video surveillance (90 days or VT required)
- Alarm system
- Motion activated flood-light at each access point
- Timely reporting of theft and/or losses to regulatory authorities

Security for Outdoor Cultivation - All

Recommendation 2

- Video surveillance system with unobscured views of areas
 - Monitoring and secure storage of video surveillance (90 days or VT required)
- Alarm system
- Motion activated flood-light at each access point
- Timely reporting of theft and/or losses to regulatory authorities
- **Caveat:** No gates or fences are needed if inability to view from public areas or any other buildings

Recommendation 3 – Agency of Agriculture

- 7 Security Recommendations

- 1000 sq ft – only choose 1
- Fencing – all:
- 3000 sq ft – plus 2 items
- 6000 sq ft – plus 3 items

- *1000 sq ft cultivator*

- May only choose fencing if preferred
- No additional security elements required

7 Security Recommendations

1. Video surveillance system with unobscured views of areas
2. Alarm system
3. Photographic surveillance
4. Motion activated flood-light
 - May face away from the plant
5. Security services
 - *With or with armed physical presence*
6. Motion-sensored trail cameras
7. Controlled point of access

Recommendation 3 – Agency of Agriculture

- Timely reporting of theft and/or losses to regulatory authorities for all
- At end of growing season, at least 3 weeks before harvest, 24- hour attendance / security required
 - THC is peaks 2-3 weeks before harvest
 - Highest risk for theft is during this time period
- If crop is visible from the street, a physical barrier of concealment must be created
 - Example: Fencing, Hedge, Barn, etc
- If a facility experiences theft, another level (recommendation) would be required
- Before license is granted, site must be visited by an inspector to determine security risks
 - Visibility and Accessibility
 - Additional security and/or barrier may be required after inspection
- Point of access to cannabis crop and GPS location must be included in application
- Following first growth season – security and compliance must be reassessed

Common Indoor Cultivation Security Measures

- Security alarms and locks on all perimeter doors and windows
- Video surveillance with continuous monitoring and storage
- Rules for camera placement and coverage of all “limited access areas,” entrances and exits
- Seed-to-sale traceability systems to prevent diversion
- ID badges for all licensees and employees on the premises
- Logs of all non-employee visitors kept for three years
- Waiver of a security requirement allowed if alternative is available

Retail Establishment Security Measures

- Indoor cultivation security measures overlap with retail security
- Surveillance video is commonly required, especially in point-of-sale areas, entrances, exits, and anyplace cannabis is handled
- Surveillance video should run at 15 frames per second, 24 hours a day, and be stored at least 90 days, with timestamps
- In some cases, retail cannabis should be kept out of plain sight
- Employees should wear ID badges at all times while a work
- Retailers should have security and alarm systems to prevent and detect theft
- Retailers should immediately notify police and CCB of a breach or theft of cannabis product

Indoor Cultivation and Retail Security Simplification

- How can these rules and all the detailed regulations that go with them be simplified to meet needs of Vermont small business?
- Are the cannabis security standards promulgated by neighboring states drastically more burdensome than the rules that govern alcohol sales by Vermont's agency stores?
- Should we look there for ways to simplify the cannabis retail experience?

Public Comments

In-Person Public Comments

Provide written Public Comments

<https://ccb.vermont.gov/form/publicinputform>