



A medical marijuana facility licensee can apply for an adult-use establishment license starting November 1, 2019. This bulletin highlights requirements and/or notable changes that medical facilities must adhere to in order to pass pre-licensure inspections and compliantly possess adult-use licenses.

Requirements for **all current medical facility licensees** interested in adult-use licenses are as follows:

- MRA Adult-Use Emergency Rule 32(1) permits a person that holds equivalent licenses with common ownership under the adult-use license and medical license to operate those equivalent licenses at the same location if certain requirements are met. However, Adult-Use Emergency Rule 56(2)(a) **prohibits a person under the age of 21** to volunteer or work for the marijuana establishment. In order to pass pre-licensure inspections of an adult-use establishment, all licensed medical marijuana facilities must either be completely partitioned from a proposed adult-use establishment or not employ a person under the age of 21 if the facilities are not partitioned.
- Adult-Use Emergency Rule 34(4) requires a marijuana establishment to obtain prelicensure approval from the Bureau of Fire Services (BFS). Fire safety inspections will be required for all marijuana establishments. The following marijuana facilities will also require a fire safety plan review: Grower, Processor, Microbusiness, Designated Consumption Establishment (DCE). BFS has information on how to submit plans on their website at [www.michigan.gov/bfs](http://www.michigan.gov/bfs) after the MRA notifies the licensee when they can submit for a BFS Plan Review. DCEs should also refer to Adult-Use Emergency Rule 59(2) for requirements of the Designated Consumption Establishment plan.
- Adult-Use Emergency Rule 30(3)(a) requires marijuana establishments to comply with the natural resources and environmental protection act, 1994 PA 451, MCL 324.101 to 324.90106. Additional environmental guidance is available [here](#).
- Adult-Use Emergency Rule 7(13) requires applicants to provide a social equity plan detailing a plan to promote and encourage participation in the marijuana industry by people from communities that have been disproportionately impacted by marijuana prohibition and enforcement and to positively impact those communities.

- Adult-Use Emergency Rule 56(7) elaborates that visitors that are not employees or providing trade services are prohibited where hazardous materials are used, handled, or stored in the marijuana establishment.

### **Safety Compliance Facility highlights**

Adult-Use Emergency Rule 29(3)(f) requires Adult-Use Safety Compliance Facilities to retain and employ at least one laboratory manager with a relevant advanced degree in a medical or laboratory science. A laboratory manager shall be responsible for the following duties, including, but not limited to:

- Ensure tests are conducted in accordance with ISO 17025.
- Ensure test results are accurate and valid.
- Oversee day-to-day operations.
- Validate reporting requirements in the statewide monitoring system.
- Verify conformity with ISO 17025.
- Any other duties required and published by the agency.

### **Secure Transporter highlights**

Adult-Use Emergency Rule 33(4) requires Secure Transporters to store vehicles at its primary place of business. If a Secure Transporter stores a vehicle that does not contain marijuana or marijuana product at a location that is not its primary place of business, they must indicate that in their establishment plan.

MRA Adult-Use Emergency Rule 33(4) requires Secure Transporters to remain on-site at an establishment during a marijuana transfer until the marijuana product is weighed and accepted – or rejected – before leaving the marijuana establishment.

Questions can be sent to the Marijuana Regulatory Agency Enforcement Section via email at [MRA-Enforcement@michigan.gov](mailto:MRA-Enforcement@michigan.gov).

For more information about the Marijuana Regulatory Agency, please visit [www.michigan.gov/MRA](http://www.michigan.gov/MRA).