



TABLE OF CONTENTS

MISSION STATEMENT	1
COMMISSIONERS AND EXECUTIVE DIRECTOR	2
FY25 BY THE NUMBERS	3
INTRODUCTION	5
IMPLEMENTATION OF ADULT- AND MEDICAL-USE MARIJUANA PROGRAMS	7
Purpose	7
Executing the Commission's Mission	7
Revenue	8
Finance	9
Personnel	10
Ongoing Regulatory Work	11
Agents	13
Medical Use of Marijuana Program	15
Licensing	1 6
Enforcement	19
Equity Programming and Community Outreach	22
Constituent Services	26
Communications	28
Government Affairs and Policy	31
Legal	33
Research	35
CONCLUSION	38



MISSION STATEMENT

The mission of the Cannabis Control Commission is to honor the will of the voters of Massachusetts by safely, equitably and effectively implementing and administering the laws enabling access to medical and adult-use marijuana in the Commonwealth.

The Commission will foster the creation of a safely regulated industry that will create entrepreneurial and employment opportunities and incremental tax revenues in and to communities across the state and which will be a best practice model for other states. The industry will be characterized by participation by small and larger participants and with full and robust participation by minorities, women and veterans. We will develop policies and procedures to encourage and enable full participation in the marijuana industry by people from communities that have previously been disproportionately harmed by marijuana prohibition and enforcement and positively impact those communities.

COMMISSIONERS AND EXECUTIVE DIRECTOR



Bruce Stebbins (Acting Chair) September 2020 – Current Joint Appointment – Governor, Attorney General, Treasurer Regulated Industry



Nurys Camargo
January 2021 – May 2025
Joint Appointment – Governor, Attorney
General, Treasurer
Social Justice



Ava Callender Concepcion

January 2021 – Current

Appointed by the Attorney General

Public Safety



Kimberly Roy
July 2021 – Current
Appointed by the Governor
Public Health



Travis AhernMarch 2025 – Current
Executive Director

1 • Cannabis Control Commission

FY25 BY THE NUMBERS



\$265M

Sales and Excise Tax



\$20M

Non-Tax Revenue



46

Public Meetings



814

Compliant Host Community Agreements



1,404

On-Site Inspections



30,000

Constituent Phone Calls

The Industry to Date



\$8B

Gross Cannabis Sales



93

Operational Medical Treatment Centers



82,407

Certified Active Patients



14,524

Unique Registered Agents



1,101

Social Equity Program
Participants



77

Social Equity Program Training Courses



INTRODUCTION

Within the rapidly shifting landscape of the Commonwealth's licensed cannabis industry, the Cannabis Control Commission (Commission) remains committed to providing responsible oversight, comprehensive regulation, and a policy framework that prioritizes public health, safety, equity, and sustainability. This past fiscal year was pivotal to the agency's development, with the finalization of the Commission's first formal governance charter and significant changes to the agency's structure. The Commission also approved policies to advance equity and support delivery businesses, improve lab testing standards, and simplify licensing processes, all while increasing accountability and transparency. On June 30, the Commonwealth's adult-use market surpassed \$8 billion in total gross sales which is a testament to the continued maturation of the legal cannabis marketplace in Massachusetts.

During this period, Executive Director Travis Ahern was hired following a nationwide search process and started his work as the agency's administrative head in March. The Executive Director Search Subcommittee, composed of then-Acting Executive Director/Chief People Officer Debra Hilton-Creek, Acting Chair Bruce Stebbins, Commissioner Ava Callender Concepcion, and cross-functional staff, led the recruitment and onboarding of the agency's new Executive Director. Ahern, who has an extensive background in municipal finance and public administration, brings a depth of experience in government operations and budget management. Upon joining the agency, Executive Director Ahern has worked closely with Commissioners and staff to establish clear goals to continue the Commission's momentum on policy reform and implementation, strengthen internal operations, and bring closure to several longstanding projects, many of which are outlined in this report.

In May, Commissioner Nurys Camargo stepped down from her role as the agency's social justice appointee. At the time of this publication, the agency's business continues to be conducted with three sitting Commissioners out of the five identified in statute, all of whom were appointed in 2021: Commissioner Concepcion, who serves in the Commission's public safety seat; Commissioner Kimberly Roy, who serves in the Commission's public health seat; and Acting Chair Stebbins, who serves in the Commission's regulated industry seat and was appointed for a second, five-year term starting Sept. 1, 2025 by the Governor, Treasurer, and Attorney General. The Commissioners, each appointed in accordance with G.L. c. 10, § 76, are charged with setting policy, voting on licensing decisions, and overseeing the agency's strategic direction.

Following two years of work on internal governance, the Commission finalized and adopted its <u>first</u> <u>charter</u>. The document reflects a collective effort by Commissioners and staff to formalize agency decision-making processes, define responsibilities, and promote durable and standardized operations. This milestone comes as the result of long-term mediation, public deliberations, and consensusbuilding.

This year's annual report reflects both the progress, challenges, and achievements of the past fiscal year as well as the work still ahead to strengthen Massachusetts' cannabis industry. The Commission has continued to advance public health and safety, promote social equity, and support business vitality, all while refining policy, enhancing oversight, expanding public education, and facilitating

market access. Yet the Commission also recognizes that progress is still needed to meet the evolving needs of patients, caregivers, adult consumers, businesses, and communities. For multiple years, the Commission has operated under flat or reduced budget appropriations, limiting its ability to address priorities and invest in necessary IT updates at the pace and scale the industry requires. The Commission remains focused on supporting a fair, welcoming, and well-regulated cannabis market; however, with sufficient funding, the Commission could move beyond maintenance to deliver the critical updates and innovations necessary to meet the needs of stakeholders across the Commonwealth.



5 • Cannabis Control Commission

Cannabis Control Commission

IMPLEMENTATION OF ADULT- AND MEDICAL-USE MARIJUANA PROGRAMS

Purpose

This report provides information on the implementation of the adult-use marijuana program, as well as the Medical Use of Marijuana Program. It covers activities during the 2025 fiscal year, with data current as of June 30, 2025, unless otherwise noted. This annual report fulfills the Commission's statutory obligation under G.L. c. 94G, § 4(h) and St. 2017, c. 55, § 31, providing the Legislature with a transparent account of the agency's operations, regulatory development, and public guidance initiatives.

Executing the Commission's Mission

Established in 2017, the Commission is responsible for implementing and administering Massachusetts' adult-use and medical cannabis laws pursuant to G.L. c. 94G, § 4, Chapter 369 of the Acts of 2012, and related statutes. The Commission's mission is to honor the will of Massachusetts voters by ensuring safe, equitable, and effective access to cannabis, regulating cultivation, manufacturing, testing, distribution, and sales while prioritizing public health, equity, product safety, and community safeguards. The agency is tasked with implementing and administering laws that govern the cultivation, manufacture, testing, distribution, and sale of cannabis in Massachusetts. These responsibilities include developing and enforcing regulations that prioritize public health, promote equity in the marketplace, ensure product safety and integrity, and safeguard communities.

Since publishing its first regulations in 2018, the Commission has amended its rules almost annually to reflect statutory changes, expand opportunities for licensees, and improve patient access. Notable actions include the 2018 assumption of oversight over the Medical Use of Marijuana Program from the Department of Public Health (DPH), the 2021 regulatory overhaul merging collocated operations rules into existing frameworks, the 2023 implementation of Chapter 180 of the Acts of 2022, and the 2024 regulatory amendments easing delivery restrictions and increasing access for patients. The Commission is currently revising its regulations again to incorporate new Social Consumption Establishment license types, changes to Transporter licenses, and updates to agent registration.

In addition to regulations, the Commission issues guidance documents to assist consumers, patients, licensees, applicants, and municipalities with understanding and complying with regulatory requirements. To date, the agency has issued 21 guidance documents and three protocols. These resources are available on the Commission's website at https://masscannabiscontrol.com/public-documents/guidance-documents/.

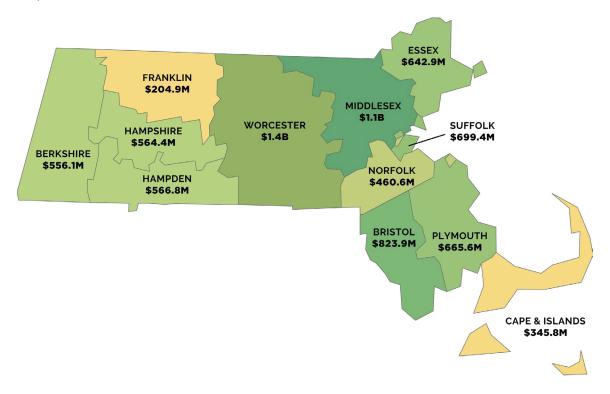
Revenue

The Commission is proud to have continued to operate on a cost-neutral basis. In fact, as this report shows, the Commission's activities have enabled annual increases in Commonwealth tax receipts. Revenue from application, licensing, fines, and other fees, along with adult-use marijuana sales and excise tax revenue, is deposited into the Marijuana Regulation Fund. In FY2025, the Commission collected \$20 million in non-tax revenue. The Massachusetts Department of Revenue reported a total of \$265 million in marijuana sales tax revenue and marijuana excise tax revenue collected as of May. Monthly gross sales continue to increase with record-breaking numbers in the early months of 2025.

This past fiscal year also witnessed remarkable adult-use cannabis sales achievements with May establishing a new record for a single month at \$142.3 million in gross sales. On June 30, adult-use cannabis revenue surpassed \$8 billion in gross sales since the first two adult-use retail stores on the East Coast opened for business on November 20, 2018. The ongoing trajectory is expected to continue into the new fiscal year, even with the expansion of cannabis legalization in surrounding New England states.

These increases are expected to continue due to the highly anticipated Social Consumption Establishment license types becoming available, the change in regulation to allow delivery businesses and lab transportation to only require one agent per vehicle, and the increasing number of Marijuana Establishments obtaining licensure.

Gross Sales for Marijuana Establishments and Medical Marijuana Treatment Centers (As of January 2025)



7 * Cannabis Control Commission * 8

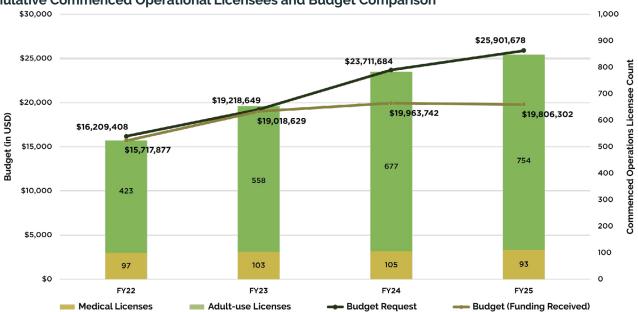
Finance

Despite generating substantial revenue for the Commonwealth, the Commission's appropriations have remained flat or been reduced, constraining its ability to reinvest in programs and infrastructure that sustain the industry's growth. Commission operations are funded through the Marijuana Regulation Fund, which is subject to appropriation and supports public health and safety needs, substance use disorder prevention, programming for restorative justice, jail diversion, workforce development, and the Cannabis Social Equity Trust Fund that is administered by the Executive Office of Economic Development (EOED), among other uses.

In FY2025, the Legislature appropriated \$20 million in total for the Commission: \$16.5 million for the Commission's Operations and \$3.5 million for the Medical Use of Marijuana Program. The Commission fully expensed both appropriations, continuing to grow, hire additional staff, and implement legislative mandates as the industry matured, all while generating surplus revenue for the Commonwealth.

For FY2026, the Legislature appropriated a total of \$19.7 million for the Commission: \$16.2 million for the Commission's Operations and \$3.5 million for the Medical Use of Marijuana Program. The amount appropriated was a reduction from the prior year, and less than the Commission's FY2026 request, which totaled \$30 million. The FY2026 funding request reflected essential needs, including the establishment of a Standards Laboratory to increase cannabis product testing and analytics, launch of a public awareness campaign for forthcoming social consumption, expanded training for Social Equity Program participants, and reinstating \$2.85 million in deferred costs from FY2025 and FY2024. These investments are critical to meet statutory deadlines, implement major revisions to regulations, and provide a much-needed investment in an IT infrastructure that no longer meets the needs of the Commission or the cannabis industry in 2026. While the Commission is taking cost savings measures in FY2026, these appropriations leave no margin for continuing existing programs, or to absorb the growing operational demands, making a supplemental budget request likely to meet current and ongoing public safety requirements and new statutory requirements.

Cumulative Commenced Operational Licensees and Budget Comparison



Personnel

The Commission's Human Resources Department is responsible for creating and implementing policies, processes, and programs to support the Commission's mission, strategic vision, and efforts to create a great place to work. The Commission has a strong commitment to attracting, rewarding, developing, and retaining an inclusive, diverse, and talented workforce. At the time of this report, the Commission has filed 136 positions and has implemented a hiring freeze as the result of FY2026 budget shortfalls. Of the Commission's current employee population, 53% are female and 24% are persons of color. The agency's management team is 67% female and 39% persons of color. The agency has 2% of employees who chose not to specify their gender, and 20% did not specify their ethnicity.

This year, the Commission demonstrated its continued investment in professional development and internal mobility and advancement through 16 staff promotions across departments. Three key leadership roles were filled: Executive Director, Chief of Investigations and Enforcement, and General Counsel, in addition to several other key roles in departments across the Commission. The Commission's ability to recruit, retain, and expand its workforce is directly tied to the funding it receives. Staffing capacity has been further challenged by turnover during the past fiscal year, which has placed additional strain on existing personnel to meet operational and statutory demands. Without sufficient and consistent appropriations, the Commission's ability to maintain a stable, experienced workforce and deliver on its legislative mandates will be significantly constrained.

The Human Resources Department continued to support employee engagement and inclusion within a remote work environment through a range of initiatives to include the Commission's Diversity, Equity, Inclusion, Justice, and Belonging (DEIJB) initiatives. During this period, employee resource groups, DEIJB committees, monthly communications, resource sharing, and professional development opportunities were implemented and held.



9 * Cannabis Control Commission

Ongoing Regulatory Work

In FY2025, the Commission continued its practice of utilizing specialized working groups to evaluate and respond to emerging needs across the regulated cannabis industry. Subject-matter experts from multiple departments convene to conduct in-depth research, review and implement statutory changes, develop recommendations for regulatory revisions, and coordinate cross-agency initiatives. By leveraging diverse expertise, the Commission's working groups ensure that complex issues are identified and addressed in a comprehensive and timely manner. Several key areas of focus in FY2025 included the review of new legislation, the refinement of regulatory frameworks, and the advancement of projects requiring collaboration across the agency's operational, policy, and compliance divisions.

Social Consumption

The Social Consumption Regulatory Working Group continues its work through 2025. In December 2024, the Commission unveiled a proposed regulatory framework that establishes three new Social Consumption Establishment licenses and opened an informal public comment period to gather initial feedback. Commissioners then met in public session throughout Spring 2025 to further discuss the draft regulations and make additional changes. On July 29, Commissioners voted to approve draft regulations relating to Social Consumption Establishments, marking the beginning of the Secretary of the Commonwealth's formal promulgation process, including the required public comment period which will culminate in September. Following receipt and review of public comments, Commissioners will work with staff to finalize the regulations. Implementation of these new license types will depend on available funding and resources available to support the development of IT infrastructure for license applications, a public education campaign, continued roundtables with municipal leaders, operational updates, guidance documents, and inspections.



Delivery Exclusivity

In March, the Commission extended the existing delivery exclusivity period for an additional 12 months to April 2026 while committing to conduct further study to assess whether the goals of the exclusivity period have been met. Consistent with its statutory mandate and the Commission's mission to redress the historically unequal enforcement of cannabis laws against disadvantaged groups, these license types have been limited to equity participants for the first three years of their availability.

A Delivery Exclusivity Working Group was formed to prepare materials and a report on the exclusivity period's success. These efforts are led by the Legal Department and the Equity Programming and Community Outreach Department, in conjunction with other agency departments and the Donohue Institute at the University of Massachusetts. Following issuance of the working group's report, Commissioners will vote to decide whether an additional extension is required for "full participation" in Massachusetts' legal industry is to be achieved by stakeholders from communities that have been disproportionately harmed by previous marijuana prohibition. Delivery licenses may open up to general license applicants as soon as April 2026 if Commissioners decide the goal of full participation has been accomplished.

Access to Medical Cannabis

The Access to Medical Use Cannabis Working Group was established in May to conduct a comprehensive review of the Medical Use of Marijuana Program regulations under 935 CMR 501.000, with the goal of expanding patient access to Medical Marijuana Treatment Centers (MTCs) and medical-use cannabis. The Commission originally adopted a "lift and shift" regulatory model when inheriting the program from DPH in 2018, largely maintaining existing rules to preserve patient access and ensure operational continuity. However, feedback from stakeholders—including the 2024 Listening Session on the Islands, and most recently at the February Medical Program Listening Session—identified key areas for modernization. These include addressing the vertical integration requirement which obligates MTCs to cultivate, manufacture, and dispense cannabis to patients, thereby creating barriers to medical market entry and other potential operational updates such as transitioning from physical registration cards to electronic options to reduce costs. The Working Group may also explore on-site consumption in alignment with pending Social Consumption Establishment regulations.

The Working Group is developing proposed regulatory amendments that ensure the program's long-term viability while maintaining patient access and compliance with statutory mandates. Its work includes evaluating and revising provisions related to vertical integration, streamlining administrative processes, and identifying opportunities for efficiency that benefit patients, caregivers, Certifying Healthcare Providers, MTCs, and the Commission. The proposed changes will be reviewed by a designated Consultation Team including members within the Commission and on the Cannabis Advisory Board before final recommendations will be provided to the full Commission at a future public meeting. Bringing these regulation changes to fruition and implementing them effectively will be contingent upon available resources and funding.

11 • Cannabis Control Commission • 12

Implementation of Chapter 180 of the Acts of 2022

On October 27, 2023, the Commission promulgated historic new adult and medical use of marijuana regulations in accordance with Chapter 180 of the Acts of 2022, An Act Relative to Equity in the Cannabis Industry. These reforms were reviewed by three individual working groups who provided recommendations on regulation changes, guidance and process development as well as identifying existing Commission materials that would need revisions and identified new forms or templates needing creation. Implementing the changes contained within these regulations has required significant cross-departmental work in addition to regular responsibilities.

As of June 25, staff have completed 244 of 283 identified deliverables and 1,420 of 1,481 checklist items, with remaining work largely depends on third-party vendors and IT infrastructure. Each deliverable undergoes extensive review to ensure new processes, guidance, and documents function effectively.

A major milestone was the publication of the Model HCA, Model HCA Waiver, Host Community Agreement guidance and Municipal Guidance documents to assist licensees and host communities with becoming compliant with the new regulations and law. Since March 1, 2024, the Commission has received 1,022 HCAs as part of the license application and renewal process including executed Model HCAs and HCA Waivers. In FY2025, the Commission reviewed 814 compliant HCAs including 263 compliant Model HCAs and 132 HCA Waivers. The Commission's oversight of HCAs includes approving and certifying HCAs, voiding noncompliant provisions, and sanctioning or publicly identifying noncompliant municipalities.

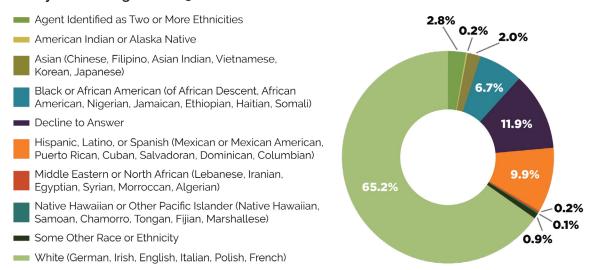
To further promote equity under the new law, the Commission published a Model Municipal Equity By-Law or Ordinance Template and related guidance to help host communities establish licensing policies that meaningfully include communities disproportionately harmed by prior marijuana prohibition and enforcement. The Commission is working in close partnership with its third-party vendors whose progress will be critical to finalizing all outstanding deliverables within this fiscal year.

Agents

As of July 2025, the Commission received 11,317 new applications for Marijuana Establishment (ME) agent registrations, creating a total of 21,280 agent cards and 14,524 unique individuals. Of the active agent cards, 36% (7,728) of the individuals identified as female, 62% (13,160) identified as male, 0.74% (157) identified by a different gender and 1% (235) declined to answer. The Commission has also received 2,077 new applications for Medical Marijuana Treatment Center (MTC) agent registrations, creating a total of 5,469 active agent cards for 1,885 individual agents. The active agent cards are comprised of 59% (3,400) individuals who identify as male, 37% (2,035) who identify as female and less than 0.62% (34) identify as "Other".

The Commission is also considering amending the agent badging process as the industry has voiced concerns with the multiple badges required for an agent to work under collocated establishments. A proposed change is included in the social consumption regulations, but rollout and technical changes are subject to Commission resources, bandwidth, and available funding.

Race/Ethnicity of Active Agents FY25



Responsible Vendor Training (RVT)

Commission regulations 935 CMR 500.105(2)(b) and 935 CMR 501.105(2)(b) outline the RVT requirement for all current ME and MTC agents. The Licensing Department manages the RVT Program, including the application process, communication with applicants and current vendors, and any regulatory updates regarding RVT. To date, the Commission has approved 35 applicants, out of which eight applicants are Certified RVT Vendors of the Basic and Delivery Core Curriculum.

In 2023, the Commission unveiled new training curricula for cannabis business employees. These RVT curricula are designed to cater to both MTCs and adult-use MEs. The mandatory Basic Core Curriculum, already in place, covers essential topics such as product knowledge, responsible serving procedures, risk mitigation strategies, and public safety. An optional Advanced Core Curriculum is now available, enabling Agents to build on the knowledge, skills, and practices covered in the Basic Curriculum and specialize in areas such as cultivation, product manufacturing, social equity, and more. In addition to the Basic Core Curriculum, the Delivery Core Curriculum is required for all agents working under a delivery license type to ensure compliance with regulations and provides training on how to safely conduct deliveries, cash handling policies, strategies for de-escalating potentially dangerous situations, collecting and communicating information to assist in investigations, and more.

Additional courses will also be developed for social consumption establishment agents to ensure they are trained to monitor signs of over intoxication, follow safety protocols, and similar training to the TIPS program that bartenders receive in the Commonwealth. Creating the guidelines and requirements for these RVT courses will be subject to Commission resources and funding when the regulations are promulgated.

The Commission published <u>RVT Guidance</u> and <u>FAQ documents</u> to guide applicants through the RVT certification process as well as an updated <u>RVT Checklist</u> in the public documents section of the Commission's website.

13 * Cannabis Control Commission 14

Medical Use of Marijuana Program

The Commission has administered the Medical Use of Marijuana Program since the program transferred from DPH on December 24, 2018. As of June 30, the Medical Use of Marijuana Program has 82,407 Certified Patients, 6,240 Active Caregivers, and 473 Certifying Healthcare Providers (Certifying Physicians, Nurse Practitioners, and Physician Assistants). The Constituent Services team assists patients and caregivers with registration and renewal applications, troubleshooting technical issues, understanding allotments and where to access medication, and sharing other information regarding the Medical Use of Marijuana Program. The team also provides increased support to some of the Commonwealth's most marginalized constituents to ensure that their specific needs are met, including but not limited to, veterans, court-involved individuals, and senior citizens.

The Commission is committed to improving access to medical marijuana for patients and caregivers. In FY2025, the Commission moved to increase patient access to medical marijuana by revising regulations to allow patients to request a telehealth consultation with a Certifying Healthcare Provider for their initial certification on a permanent basis, following the COVID State of Emergency in Massachusetts. The Commission also revised its rules to allow for Certifying Healthcare Providers who are nurse practitioners with independent practices the authority to certify qualifying patients without a supervising physician. This change allows nurse practitioners registered with the Medical Use of Marijuana Program to have the same prescribing authority afforded by the Board of Registration in Nursing (BORN).

In February, the Commission hosted a Medical Use of Marijuana Program listening session to gather feedback from patients, caregivers, providers, licensees, and all other interested constituents to hear and understand priorities for future regulatory amendments. In response to feedback received during the listening session, the Commission voted to include, among the Executive Director's goals for 2025, a comprehensive evaluation of the Medical Use of Marijuana Program. The objective is to develop recommendations that will promote the program's long-term viability and success. This work remains ongoing.

The Commission remains committed to ongoing outreach and information-sharing to support awareness and understanding of the Medical Use of Marijuana Program statewide. To meet constituents where they are, the Constituent Service team began offering in-person registration events to support extended patient and caregiver support for those in need at the agency's headquarters in Worcester. The Constituent Services team also partnered with DPH to develop a guidance document for medical professionals highlighting the benefits of the Medical Use of Marijuana Program.



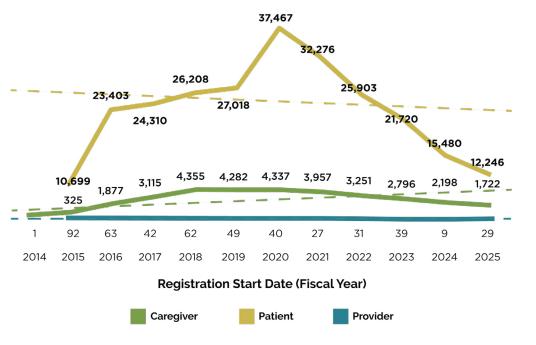
Table 1. Patient and Caregivers Applications

FY2025 Application Numbers	
Patient Registrations	12,250
Patient Renewals	70,157
Caregiver Registrations	1,722
Caregiver Renewals	4,518
Paper Applications Processed	193
Total	88,840

Medical Provisional and Final Licenses

As of July 1, Massachusetts' medical-use cannabis industry is comprised of the following: 93 vertically integrated MTC licensees that have commenced full operations to serve patients and caregivers, as well as two provisional licensees.

New Registrations Patients, Providers, and Caregivers by Fiscal Year (July 1 - June 30)



Licensing

The Commission's Licensing team oversees a broad range of regulatory processes critical to the operation and oversight of the Commonwealth's adult- and medical-use cannabis industries. From license application intake to final approval, the team ensures that all licensing activities align with the Commission's regulations and statutory mandates.

15 * Cannabis Control Commission

Cannabis Control Commission * 16

A core responsibility of the Licensing team is the review and processing of applications for new and renewal licenses, including those related to changes of ownership, name, location, and operational extensions. These applications include reviewing HCAs, ownership documents, lease or purchase agreements, standard operating procedures and more to ensure applicants are compliant with state law and regulations.

The Licensing team also manages the registration and renewal of ME and MTC Agent identification cards, RVT program certifications and renewals, supporting workforce compliance, public safety and training across both sectors of the industry.

In addition to application and compliance functions, the Licensing team provides direct support to applicants and licensees by responding to a high volume of inquiries received through the Commission's dedicated licensing inbox. The team also reviews and certifies Community Impact Fee requests submitted by municipalities—though no such requests were received during this reporting period.

Priority Applicants

Between April 17, 2018 and May 22, 2018, the Commission offered an application process for MTC priority and economic empowerment priority certification in accordance with state law. Under statute, MTC priority is an MTC previously approved by DPH when it administered the Medical Use of Marijuana Program and had at least obtained an MTC provisional license as of April 1, 2018. Economic empowerment priority required applicants to demonstrate three of <u>six possible criteria</u>. In total, the Commission received 322 submitted applications and ultimately granted priority certification to 81 MTC applicants and 122 Economic Empowerment Priority Applicants (EEAs). As of July, the Commission has issued 34 commence operations approvals to EEAs.

Exclusive Licenses

The Commission's delivery license types, including Delivery Courier, Delivery Operator, and Microbusiness with Delivery Endorsements, are exclusively available to approved Social Equity Program (SEP) participants and EEAs. The initial exclusivity period began on April 1, 2022, when the first Marijuana Delivery Operator received their notice to commence operations in the Commonwealth and spanned 36 months. As of June 30, 2025, 231 businesses have been pre-certified as either a Delivery Courier, Delivery Operator, or Microbusiness with Delivery Endorsement. In March, the Commission extended the delivery exclusivity period for an additional 12 months to April 2026 while the Delivery Exclusivity Working Group conducts a further study to assess whether the goals of the exclusivity period have been met. The Commission will reconvene in FY2026 to discuss whether to promulgate new regulations that would further extend the delivery exclusivity period.

The anticipated Social Consumption Establishment License types will also be exclusive to businesses with majority ownership comprised of approved SEP participants or EEAs, Microbusinesses, and Craft Marijuana Cooperatives for a set period of time. The goal of these exclusivity periods is to promote full participation in the regulated marijuana industry by people from communities that have previously been disproportionately harmed by marijuana prohibition and enforcement of the law, by farmers, and

by businesses of all sizes. The roll out of these three new license classes under the Social Consumption license type is subject to appropriate resources and funding available to the Commission in order to create RVT guidance, licensee and municipality guidance materials, ability to complete inspections during consumption operation hours, and technical upgrades needed in the licensing system.

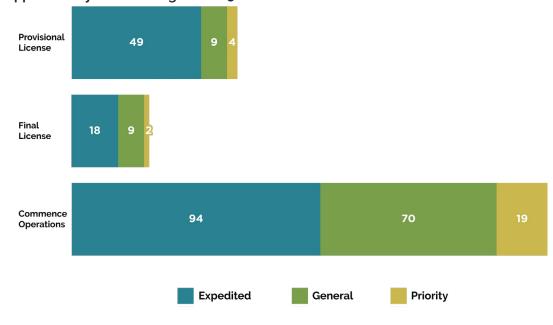
Provisional and Final Licensees

As of July, the Commission had received 1,889 license applications for adult-use MEs. At the time of this report, Commission staff are reviewing 26 adult-use license applications. The following is a summary breakdown of the 1,889 ME and MTC license applications fully submitted to the Commission as of July 2025:

- 260 MTC Priority Applicants;
- 144 EEAs;
- 740 Expedited Applicants;
 - These applicants consist of minority-, women-, and veteran-owned businesses as certified by the Supplier Diversity Office as well as Independent Testing Laboratories, Outdoor Cultivators, Marijuana Microbusinesses, and Craft Marijuana Cooperatives. SEP Participant Applicants also receive expedited review
- 394 SEP Applicants (as approved through the Commission's <u>Social Equity Program</u>); and
- 745 General Applicants which do not meet any of the aforementioned criteria.

As of July, 754 licensees have received notices from the Commission that authorize them to commence business operations in the Commonwealth, another 43 entities currently possess final licenses, and 474 have been approved for provisional licenses. Each year, the licensing team has authorized more businesses to commence operations and approved more final licenses than the previous year. So far this calendar year, more businesses have come online to commence operations than have closed.

Adult-Use Applicants by License Stage FY2025



17 • Cannabis Control Commission

Table 2. Social Equity (SEP), Economic Empowerment (EE), Disadvantaged Business Enterprise (DBE) Final Licenses FY2025

	SEP	EE	DBE	Total
Cultivation			8	8
Product Manufacturing	1	1	4	6
Retail	3	4	8	15
Delivery Operator	4	1		5
Delivery Courier	3			3
Delivery Courier Pre-Certification		2		2
Total:	11	8	20	39

Surrenders and Closures

Since 2018, of the 754 adult-use ME licenses the Commission has authorized to commence operations, 71 licenses, or 9.4%, have been either surrendered or not renewed by the Licensee. Those 71 do not necessarily represent total business closures. In some cases, licensees may hold multiple licenses, per Chapter 94G Section 16, but may choose to give up one or more while keeping the others active.

Adult-use Marijuana Retailers, which are the most sought-after license type, have seen even fewer closures. Since November 2018, the Commission has authorized 410 retail dispensaries to commence operations and open their doors to adult-use cannabis consumers in Massachusetts. Twenty-two retail licenses, or 5.4%, have either been surrendered or not renewed, leaving 388 active Marijuana Retailers in the Commonwealth.

Of the 112 MTCs the Commission has authorized to commence operations, 17 licenses or 15% have either closed down or expired. Of these 17 Licensees, 15 currently hold an adult-use retail license.

Changes of Ownership

Between July 2024 and July 2025, Enforcement staff has made approximately 45 recommendations for Change of Ownership applications before the Commission. Changes of Ownership applications reflect those businesses that are adding entities with control and/or ownership over the license, or applications to add new individuals with ownership interest over 10%.

Enforcement

The Commission is proud of the fair and comprehensive investigatory process it has developed and employed since the agency's inception in 2017 to ensure licensees comply with state law and regulations. Massachusetts' regulations are some of the strongest in the nation, and the agency stands by its policies and procedures that continue to build a safe, effective, and equitable industry.

Enforcement Referrals

Since July 2024, Investigations and Enforcement staff have made approximately 32 referrals to Enforcement Counsel to perform additional due diligence and review findings for possible administrative action pursuant to G.L. c. 30A, as well as 24 requests for counsel and advice. During this period, Investigations staff has completed approximately 1,404 total inspections, including unannounced inspections, license closure inspections, change of location inspections, structural change completion inspections, post-provisional license inspections, post-final license inspections, vehicle and vessel inspections, and audits. From these inspections, Investigations staff has issued approximately 917 notices of deficiencies to licensees. Investigations staff have also processed approximately 88 architectural review and structural change applications, and approximately 12 alternative security provisions.

Enforcement Actions

Since July 2024, the Commission, through its Enforcement Counsel staff, has initiated two enforcement actions in response to regulatory noncompliance. In both instances, the Commission summarily suspended establishment licenses to protect the public's health, safety, or welfare. The subject of these actions include transferring ownership of a Marijuana Retailer license and failing to accurately report compliance testing results.

Additionally, over the past year, the Commission has resolved two enforcement actions via Final Order and Stipulated Agreements negotiated by Enforcement staff through Informal Dispute Resolution (IDR) conferences. In each instance, Enforcement staff secured affirmative relief in furtherance of the public interest and to ensure future regulatory compliance. These actions, combined, resulted in fine payments totaling \$165,000 which are deposited into the Marijuana Regulation Fund. All fines collected during this fiscal year were the result of a negotiation between the parties during IDR. In addition to these actions, the Commission has issued multiple notices to licensees to ensure continued compliance with previously ratified Final Orders and Stipulated Agreements.

Enforcement Counsel staff have also received 18 referrals to conduct suitability reviews. Since July 2024, these reviews have resulted in two informal proceedings before the Commission's Suitability Review Committee. During that same time period, Enforcement Counsel staff also processed 36 requests to waive Commission regulations pursuant to 935 CMR 500.850 and 501.850.

Testing

During FY2025, the Commission's Testing team continued its oversight of 11 Independent Testing Laboratories (ITLs) and two laboratory facilities in the Island Counties. The team, led by the Interim Director of Testing and the Laboratory Testing Manager, plays a critical role in protecting public health by ensuring that ITLs meet regulatory safety standards before and while testing cannabis products.

The Testing team provides analytical and technical expertise to support internal departments including Enforcement, Research, and Data. Their responsibilities include conducting unannounced inspections of ITLs, reviewing Standard Operating Procedures (SOPs), and resolving discrepancies within Metrc, the

Commonwealth's seed-to-sale system of record. These inspections help ensure laboratory compliance with 935 CMR 500.160 and 501.160, including requirements for cannabinoid content, microbiological contaminants, heavy metals, residual solvents, and pesticide screening.

Throughout the fiscal year, the Testing team issued multiple laboratory bulletins to clarify testing protocols and address emerging concerns such as cannabinoid inflation, sampling methodology, and result reporting transparency. Notably, the Testing team worked in coordination with the Enforcement Department to investigate potential overstatements of THC potency, a growing concern among regulators nationwide.

During FY2025, the Testing team collaborated with the Enforcement Department on the drafting of two Administrative Orders regarding compliance testing submissions to one ITL and Certificate of Analysis (COA) upload requirements. Additionally, the Testing team continues to conduct an assessment of the Commission's testing regulations and protocol for potential updates and revisions to evaluate and strengthen standardized testing and reporting practices.





Investigations and Enforcement (I&E) Task Force

In December 2024, the Commission, through its Investigations and Enforcement department, established a temporary task force comprised of members from the Testing, Investigations, Enforcement Counsel, and Project Management teams to support investigative efforts relative to ITL compliance. The task force is charged with reviewing and addressing complaints related to testing and safety of Marijuana and Marijuana Products marketed to Patients and Consumers, among other things.

Through the task force's efforts this year, the Commission has worked to address constituent complaints by conducting retesting of Marijuana Products, which resulted in two public health and safety advisories alerting the public to potentially contaminated marijuana flower and pre-rolls. Additionally, investigative efforts of the task force directly led to the suspension of an ITL's license.

The ability to continue the efforts of this task force is directly tied to the Commission's available funding. While the task force achieved significant results this fiscal year, including multiple public health and safety advisories and the suspension of an ITL license, these accomplishments required substantial

cross-departmental staffing, overtime commitments, and resource reallocation from other critical functions. Members of the task force perform this work in addition to their regular responsibilities, further straining available bandwidth and resources across the agency. The investigative and retesting work involved in responding to constituent complaints is resource intensive, requiring specialized expertise from multiple Commission teams as well as coordination with licensed testing laboratories. Without sufficient appropriations, the Commission may be unable to maintain this heightened level of investigative activity, slowing response times to complaints, reducing the scope of product safety testing, and limiting the agency's ability to take swift enforcement actions. Additional funding would allow the Commission to continue proactive investigations, strengthen product safety oversight, and ensure consistent enforcement that protects both patients and consumers in the Commonwealth.

Equity Programming and Community Outreach

The Commission continues to advance its commitment to equity and community engagement by strengthening the nation's first statewide SEP and expanding outreach through the EPCO department. These efforts reflect the Commission's statutory mandate to promote equitable participation in the regulated cannabis industry and to ensure communities disproportionately impacted by marijuana prohibition are provided meaningful opportunities for economic advancement. Through expanded staffing, strategic planning, curriculum redevelopment, targeted outreach, and new platforms such as the EquityWorks Career Hub, the Commission works to reduce barriers to entry, foster professional growth, and build sustainable pathways into the legal cannabis marketplace. Collectively, these initiatives demonstrate the Commission's dedication to building an inclusive, accessible, and forward-looking industry that prioritizes reparative practices and community impact including those from Disproportionately Impacted Areas (DIAs), the medical community, municipalities and government officials, academia, and other priority constituents.

Social Equity Program (SEP)

The SEP is designed to build a pathway into the legal cannabis industry for individuals disproportionately impacted by previous marijuana prohibition. The SEP focuses on those most impacted by the War on Drugs, marijuana prohibition, disproportionate arrest, and incarceration, and provides training, technical assistance, and mentorship for entry into the regulated marketplace across four areas: entrepreneurship, entry- and managerial-level workforce and professional development, and ancillary business support. Its overall mission is to decrease the disparities in life outcomes for impacted individuals and improve the quality of life for those from DIAs. Commission staff have initiated a three-year strategic planning process to ensure the SEP continues to effectively meet its intended goals.

Approved SEP Participants and EEAs are eligible for expedited application review within the Commission's licensing queue when they submit a licensing application, receive certain fee waivers, and have exclusive access to Commission pre-certification and delivery and social consumption license types. The agency previously expanded SEP criteria and increased participation in the program to any individual listed as an owner on the original certification of an EEA who satisfies certain criteria.

SEP Program goals are to:

- Reduce barriers to entry in the regulated marijuana industry, regardless of desired specialty within the industry;
- Provide professional and technical services as well as mentoring for individuals and businesses facing systemic barriers; and
- Promote sustainable, socially and economically reparative practices in the regulated marijuana industry in Massachusetts.

To qualify for the program, an applicant must meet one of the following criteria:

- Residency in a DIA for at least five of the past 10 years and income not exceeding 400% of the Area Median Income in the applicant's respective town/city;
- A past drug conviction, continuance without a finding, or an equivalent conviction in other jurisdictions, and residency in Massachusetts for at least the preceding 12 months;
- Married to, or the child of, a person with a drug conviction, a continuance without a finding, or an equivalent conviction in other jurisdictions, and residency in Massachusetts for at least the preceding 12 months;
- Any individual listed as an owner on the original certification of an EEA who satisfies one or more the following criteria:
 - o Lived for five of the preceding 10 years in a DIA, as determined by the Commission;
 - Experience in one or more previous positions where the primary population served were disproportionately impacted, or where primary responsibilities included economic education, resource provision or empowerment to disproportionately impacted individuals or communities;
 - o Black, African American, Hispanic, or Latino descent; or
 - o Other significant articulable demonstration of past experience in or business practices that promote economic empowerment in DIAs.

Since its inception, the Commission has accepted 1,101 participants into the free technical assistance and training program. Cohort III has been the largest class to date with 446 participants. To date, approximately 72% of all program participants self-identify as Black, African American, Hispanic, or Latino descent.

Utilizing feedback from SEP participants, EPCO collaborated with contracted technical assistance and training vendors to redevelop and deliver 77 updated courses. This comprehensive, strategic redevelopment ensures the SEP curriculum continuously evolves, remains industry-responsive, and effectively addresses emerging industry trends and participant needs.

With the current SEP application period open August 1 through September 30, EPCO has increased outreach efforts statewide. These efforts include proactive informational campaigns, detailed SEP application support webinars, and accessible guidance on eligibility criteria, application processes, and available participant resources. EPCO's continued outreach ensures equitable access, robust participation, and sustained benefit for communities disproportionately impacted by cannabis prohibition.

Advanced Courses

As the Commission continues to refine and expand its programming, ongoing feedback from participants highlighted the need for a more advanced and industry-responsive curriculum. In response, the Commission has collaborated closely with contracted technical assistance and training vendors to strategically redevelop and deliver 77 updated courses, ensuring the curriculum continuously evolves to align with the growing needs of the cannabis industry. This redevelopment is part of the Commission's ongoing commitment to equipping SEP participants with comprehensive and relevant resources to successfully enter and thrive within Massachusetts' cannabis industry.

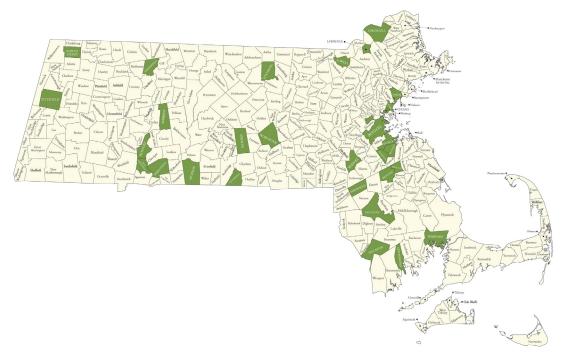
The development and delivery of future social consumption courses within the SEP will require significant investment in time, expertise, and funding. These courses must be designed from the ground up, including curriculum development, creation of instructional materials, and recruitment of qualified instructors with subject matter expertise. Once created, the courses will be delivered in formats accessible to diverse participants, potentially requiring both in-person and virtual offerings. The successful launch and ongoing availability of these courses are dependent on the Commission securing sufficient funding to support their design, implementation, and continuous improvement, ensuring that participants are fully prepared to enter and succeed in the emerging social consumption market.



Disproportionately Impacted Areas (DIAs)

Consistent with the statutory and regulatory mandate, please find below the Commission's map of DIAs, defined as a geographic area identified by the Commission for the purposes identified in M.G.L. c. 94G, $\frac{4(a^{1/2})(iv)}{4(a^{1/2})(iv)}$, and which has had historically high rates of arrest, conviction, and incarceration related to marijuana crimes (see 935 CMR 500.002 and 501.002).

23 * Cannabis Control Commission * 24



30 Areas of Dis	sproportionate Impa	ct		
Abington	Fall River	Lowell	Pittsfield	Springfield
Amherst	Fitchburg	Lynn	Quincy	Taunton
Boston	Greenfield	Mansfield	Randolph	Walpole
Braintree	Haverhill	Monson	Revere	Wareham
Brockton	Holyoke	New Bedford	Southbridge	West Springfield
Chelsea	Lawrence	North Adams	Spencer	Worcester

Engagement and Events

The Commission remains deeply committed to fostering robust and ongoing community engagement. Throughout this year, EPCO has significantly expanded outreach, actively promoting the Commission's equity programming, advancing critical initiatives, and strengthening community partnerships statewide. Over FY2025, EPCO held seven in-person events across the Commonwealth to increase accessibility for individuals seeking information on SEP, EOED's Cannabis Social Equity Trust Fund (CSETF), available licenses, municipal equity requirements and other resources. Due to budget constraints, these in-person events were limited and some prospective events were transitioned to a virtual format.

In October 2024, EPCO, in collaboration with EOED, conducted targeted outreach in Roxbury, providing essential application resources to potential applicants of the CSETF. The application period for the CSETF concluded on October 17, 2024. The Commission assisted with the awarding of grants to businesses by verifying equity status of the businesses selected as well as their license status to ensure they met the qualifying criteria set by the CSETF.

Additionally, EPCO participated in a panel discussion on February 11 at Johns Hopkins University that focused on equity in the cannabis industry. The event highlighted Massachusetts' leadership and shared best practices nationwide.

Overall, EPCO's outreach in FY2025 underscored the critical role that community engagement plays in advancing equity and expanding opportunities within the cannabis industry. The department's achievements this year, from targeted outreach to thought leadership, reflect the Commission's dedication to ensuring equitable participation statewide. However, maintaining this momentum, particularly through external events, specialized trainings, and new equity initiatives, will require additional funding to meet demand and fully realize the Commission's mission for an inclusive, accessible, and well-supported marketplace.

EquityWorks Career Hub

The EPCO team continues intensive work toward the successful development of the EquityWorks Career Hub platform, powered by Premier Virtual. EquityWorks is specifically designed to support professional growth in the regulated cannabis industry, including inclusive hiring practices and robust networking. The platform prioritizes communities disproportionately impacted by cannabis prohibition, fostering inclusive economic participation through tailored resources and networking opportunities. EquityWorks Career Hub was launched to licensees on April 14, equity programming participants on May 12, and to the general public on June 19.

EPCO successfully hosted a series of in-person training sessions on the EquityWorks platform on May 21, June 11, and June 25. These targeted outreach events focused on increasing awareness, driving platform registrations among SEP participants and job seekers, and strengthening engagement with licensed cannabis businesses and integrated business solution services. For a limited time prior to the public launch of the platform, the Commission targeted equity participants exclusively, which is vital for building community trust, encouraging early platform adoption, and guaranteeing access to digital resources among the equity participants and the public.

To spread awareness of this initiative, the Commission developed an integrated, multi-platform marketing campaign consisting of a <u>new webpage</u> added to the Equity Programming section of the Commission's website, an educational rack card, and a <u>video tour</u> as well as an email drip campaign, social media posts, and multimedia support to promote EquityWorks Career Hub and various training sessions held across the state for licensees, ancillary business owners, and job seekers of all levels.

Looking ahead, the Commission remains committed to strategically planning and organizing dynamic, robust community outreach events. These ongoing efforts are essential to supporting current and prospective equity participants, providing necessary resources, and continuously strengthening pathways into the legal cannabis industry, as business owners, skilled professionals, and integrated business solution providers.

Constituent Services

The Constituent Services Department serves as the forward-facing voice of the Commission to all residents of the Commonwealth; offering a multidimensional approach to support the general constituency of the Commission, as well as Medical Use of Marijuana Program participants. The Constituent Services

25 * Cannabis Control Commission

Cannabis Control Commission

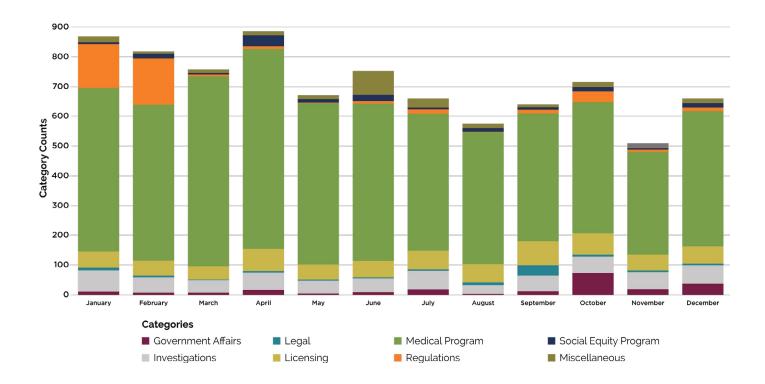
Department responds to inquiries from constituents and provides resources and information regarding the Commission's rules and regulations, sharing the work of each unit of the agency. The team also provides programmatic support for Registered Qualifying Patients and Personal Caregivers enrolled in the Medical Use of Marijuana Program.

The Commission ensures timely responses to all inquiries from the public. Constituents may contact the agency through the MassCannabisControl.com "Contact" page, email, phone, or by writing the agency with their opinions, questions, comments, and concerns. In FY2025, the Commission received and responded to more than 30,000 phone calls and approximately 8,000 emails to its general email box. The Constituent Services team liaises with other departments to resolve constituent cases, including but not limited to questions about licenses and applications, compliance, ownership, suitability, and other matters related to operating businesses.

Table 3. Constituent Services and Operator Phone Lines from FY2025

FY2025	Calls Offered	Calls Handled	Average Handle Time	Average Time in Queue
Operator Inbound	6,542	7,096	03:45min	01:48min
Operator Outbound	589	589	00:19 sec	N/A
Patient Services Inbound	24,842	30,059	11:18min	03:19min
Patient Services Outbound	5.709	5.709	08:38min	N/A

Commission Mailbox Numbers FY2025



Communications

The Commission is in constant contact with members of the public through various media and platforms. Beyond the agency's monthly public meeting, which consistently features Commissioners' availability to the media after adjournment, Commissioners attend and present at public events throughout the Commonwealth, the Northeast, and nationwide. Commission principals have made or participated in numerous press opportunities, presentations, speeches, panel discussions, round tables, and other forums before stakeholder groups such as community organizations, senior citizen groups, municipal officials, financial institutions, industry, peer regulators, and law enforcement. The agency takes its responsibility seriously to address questions raised by members of the press efficiently and transparently, and to proactively promote agency updates that will impact constituent groups through media announcements and opinion pieces, web updates, email communications, social media, and more.

Several examples from the past fiscal year and more recently include communications around regulatory reforms aimed at increasing efficiencies for cannabis deliveries and the transport of marijuana products for testing, small business expansion, and patient access; the approval of the final license for the Commonwealth's first Marijuana Research Facility; the roll out of the framework for social consumption licenses; sales milestones such as \$8 billion in gross adult-use sales and an annual adult-use sales record with \$1.64 billion generated in 2024; the extension of the exclusivity period for delivery licenses to be only available to equity participants; the launch of the EquityWorks Career Hub; and the launch of live programming for SEP participants.

Website

From July 1, 2024, through June 30, 2025, the Commission's website received more than 2,500,000 page views and over 635,000 unique visits. The website continues to provide a high level of transparency and self-service for the public by regularly maintaining various tables and tools such as the Municipal Zoning Tracker, RVT directory, and Find a Retailer map. The Commission also maintains a robust archive of public documents, including enforcement actions, agency announcements, press releases, and both provisional and final Executive Summaries and License Applications, all easily accessible to the public. In FY2025, the Commission introduced several new website enhancements and user-focused resources designed to improve transparency, accessibility, and ease of navigation. The Commission launched new, curated resource web pages for the general public for better access to information related to Chapter 180 implementation, Hearings, the EquityWorks Career Hub, and the Commission's social media channels.

Google Programmable Search

The Commission launched Google Programmable Search on its web server, providing a combined, comprehensive search experience across both the Commission's main website (MassCannabisControl. com) and its public awareness More About Marijuana campaign website (MoreAboutMJ.org). With new advanced filtering options, users may now segment search results by content type (webpage, calendar event, document, or dataset) as well as posted date, relevance, and website domain.

27 • Cannabis Control Commission • 28

Automated Licensing Tracker

The <u>Licensing Tracker</u> on the Commission's website is now fully automated with data pulled directly from the Massachusetts Cannabis Industry Portal (MassCIP) and the Medical Use of Marijuana Program Online System (MMJOS), providing weekly updates of all Licensees who have been approved to commence operations. Additional advanced filtering options provide the ability to filter licensees by medical and adult-use, location, license type, and expedited or priority status as well as the ability to search and download the data in various file types. A one-click "Related Documents" search query, powered by the new Google Programmable Search solution, is also provided for each Licensee which displays all documents associated with a specific license number available on the Commission website such as Public Meeting agendas, Executive Summaries, License Applications, Changes of Ownership, and any enforcement actions.

Virtual Engagement

The Commission sent, on average, 10 email campaigns to subscribers per month with an open rate of 43%. The Commission's social media presence includes Instagram (@CannabisControlCommission, 4,270 followers), LinkedIn (@CannabisControlCommission, 11,500) Twitter, now called X, (@MA_Cannabis, 8,770 followers) and Facebook (@MassCCC, 3,200 followers). The Commission also hosts a YouTube channel that provides access to past public meetings, educational content, and tutorials. Through these various channels, the Commission continues to communicate with the public regarding the work of the agency and its regulation of the developing industry.

Public Awareness and Education Campaigns

Educating the public about safe, informed, and responsible cannabis use is a core responsibility of the Commission and an essential part of protecting public health and safety in the Commonwealth. Yet the future of these campaigns is limited, as the public education line item in the Commission's budget has not been funded since FY2020. Without dedicated funding, the Commission has relied on organic promotion through owned and earned media strategies to sustain outreach, constraining the scale and reach of its efforts. While these initiatives have produced meaningful impact, continued and expanded campaigns, particularly those needed to support new license types such as social consumption, will require significant investment to ensure educational and accessible information is able to reach as many patients, consumers, and the general public as possible.

More About Marijuana

The Commission utilized organic promotion in FY2025 to highlight new and evergreen content for its state-mandated public awareness campaign, More About Marijuana (MoreAboutMJ.org). Although More About Marijuana was not funded for FY2025, Communications utilized its annual 4/20 campaign—a cannabis enthusiast holiday and the industry's highest sales day of the year—as an opportunity to create and promote new digital content to better educate the public about labeling, cannabinoids, product types, and responsible use.

The latest resources include a new "<u>Understanding Labels</u>" animated video that delivers product labeling information from the previous year's 4/20 campaign "Understanding Labels" flyer in a multimedia adaptation that is more popular and consumable online, and an "Understanding Cannabinoids" flyer that serves as an introduction to the most widely known and studied cannabinoids found listed on product labels by percentage.

The Commission also created and launched a new social media series based on its 2024 4/20 public awareness campaign "Marijuana Products" flyer to educate the public on the broad range of products available in Massachusetts as well as safe consumption and responsible use both in and out of home, and in consideration of ongoing policy discussions regarding social consumption business models, license types, and consumables.

Medical Use of Marijuana Program

In anticipation of the 10-year anniversary of the Medical Use of Marijuana Program sales in June, the Commission developed a series of rack cards providing an introduction to the program and its benefits to patients, how to register as a new patient and renew program registration annually, and the benefits of having a personal caregiver. These rack cards are available to licensees, Certifying Healthcare Providers, community organizations, and the general public to order free of charge via the Massachusetts Health Promotion Clearinghouse along with a large suite of public education materials in both print and digital download formats.



29 * Cannabis Control Commission 20 Cannabis Control Commission 30 Cannabis Control Control Commission 30 Cannabis Control Co

Government Affairs and Policy

Throughout FY2025, the Commission continued to serve as a trusted resource for policymakers at the local, state, and federal level, maintaining robust collaboration with the Massachusetts Legislature and Executive Branch to advance the Commonwealth's cannabis policy goals. Per the Commission's legislative outreach policy, the Commission does not weigh in on specific bills but rather, may advocate for general policies to support an industry that protects public safety, health, and welfare, and that promotes an equitable and fair marketplace. The Commission may also, by majority vote, approve policy statements to aid the Legislature on topics that fall under the agency's purview.

During the 194th legislative session, Commissioners and staff were actively engaged with members of the Legislature and the Joint Committee on Cannabis Policy to answer questions, provide data, and share background information on current regulatory practices. These ongoing discussions have ensured that legislators remain well-informed as they consider bills that may impact the cannabis industry and the Commission's work. Most often, legislative offices are in contact with the Commission on behalf of their constituents.

The Commission has regularly engaged with municipal officials, local boards of health, and police departments to provide data, expertise, and updates on regulatory developments including social consumption. The Commission also participated as a vendor at the Massachusetts Municipal Association (MMA) Annual Meeting and Trade Show in January. There, staff met directly with municipal leaders from across the Commonwealth, providing guidance and resources on key topics such as municipal equity requirements, community impact fees, and HCAs. These conversations helped local officials as they implement Chapter 180 mandates and helped align local practices with state policy.



Massachusetts is widely regarded as a national leader in marijuana policy, as evidenced by the volume of our publications and the frequent consultation requests from other states and federal agencies. The Commission voted in July 2024 to submit a <u>public comment</u> to the United States Department of Justice regarding the Drug Enforcement Administration's proposed rule to reschedule marijuana to Schedule III. The comment highlighted the Commonwealth's experience regulating cannabis safely while advancing public health and social justice. The Commission applauded the Administration's acceptance of cannabis as holding medicinal benefits to some patients, and shared questions and areas for our partners in federal government to consider. Following the public comment period, a hearing was scheduled and later postponed for the Department of Justice to hear further insights into rescheduling and called upon a member of the Commission's Cannabis Advisory Board to testify as well as another member to serve as an expert.

The Commission's Government Affairs and Policy team maintains strong relationships with regulatory counterparts in other states, meeting regularly through the Cannabis Regulators Association (CANNRA) to discuss topics such as hemp, public health, interstate coordination activities, compliance and enforcement, banking, public education, social equity, medical cannabis, and federal policy. These engagements have allowed the team to draw on the experiences of peer agencies nationwide, learning from other states' approaches and incorporating those insights into policy development in Massachusetts. By benchmarking against national best practices, the Commission continues to refine its regulations, improve market outcomes, and ensure that the Commonwealth remains a leader in safe, equitable, and effective cannabis governance.

Building on the success of prior years, the Commission hosted its third annual <u>State of Cannabis in Massachusetts</u> event at the State House in April, bringing together legislators and their staff for a comprehensive update on the agency's programs, market data, and policy initiatives. Commissioners and staff presented topics including social equity, HCA oversight, and market trends, and distributed updated informational materials summarizing the agency's work. This event also served as an opportunity for Legislators to meet the Commission's new Executive Director and hear directly from him about goals for the Commission's future.



31 * Cannabis Control Commission

Cannabis Control Commission

Legal

The Legal Department advises the Commission and its staff on the interpretation and implementation of its governing laws and on applicable areas of state and federal law. In addition, Legal coordinates, as needed, on responding to external inquiries from members of the public and from federal and state agencies and officials, including agency counsel. Staff also supports professional groups and academic institutions focused on the developing area of cannabis law. In addition to the General Counsel, the Legal Department consists of a Deputy General Counsel, several Associate General Counsels, two Paralegals and one Legal Assistant.

Litigation

The Legal Department works closely with the Office of the Attorney General on litigation and other matters implicating the interpretation and implementation of the Commission's laws and regulations as well as pertinent areas of the law. To that end, the Commission's General Counsel has obtained designation as a Special Assistant Attorney General (SAAG) to represent the Commission in certain court matters. Pursuant to the SAAG designation, the General Counsel has filed pleadings in several pending Superior Court matters. As of the date of this report, the Commission is not a named defendant in any pending court litigation matters. Legal staff also monitor and alert Commissioners and staff to important decisions made by federal and state courts on relevant aspects of the law.

Open Meeting Law Compliance

The Commission conducts its public meetings in compliance with the Open Meeting Law, G. L. c. 30A, §§ 18-25, which includes posting notice and materials at least 48 hours in advance of its meetings. The Commission's public meetings are held in virtual and/or hybrid formats and, over the past few years, have been consistent with the Governor's executive orders related to the Open Meeting Law and the Legislature's enactment of Chapter 2 of the Acts of 2025. During FY2025, there were three complaints filed against the Commission relating to the Open Meeting Law. In two of those complaints, the Attorney General's Office ruled against the Commission, but found no evidence of an intentional violation in either case and did not impose a fine. As of the date of this report, the third complaint is still pending.

In addition to live streaming its public meetings, the Commission posts recordings of its public meetings on its YouTube channel and its minutes on its website. On a tri-annual basis, the Commission reviews its executive session minutes for release to the public. Relatedly, Legal staff also advises on compliance with Robert's Rules of Order, previously adopted by the Commission, and on questions relating to the conduct of its public meetings.

Ethics Compliance

As required by G. L. c. 10, § 76 (k), the Commission has developed its own Enhanced Code of Ethics. The Legal Department supports Commissioners and staff in ensuring compliance with state ethics laws and its enhanced code of ethics. As part of its onboarding process, Legal staff ensures that new employees satisfy applicable ethics requirements.

Public Record Compliance

During CY 2024, the Commission's Records Access Officer received and responded to approximately 216 requests for public records. When necessary, the Commission has withheld exempt records under G. L. c. 4, § 7 (26), in order to safeguard records considered to be confidential under its statutes and regulations and the Public Records Law. In January 2025, the Commission filed its annual report with the Secretary of the Commonwealth's Public Records Division. As needed, it consults with the division to ensure compliance. As of July 30, 2025, the Commission is not a party to any pending appeals concerning its response to public record requests.

The Commission's operating principles include a focus on conducting all processes openly and transparently. To that end, staff regularly post the following:

- Applications granted provisional and final licensure, which can be found on the <u>Licensing</u>
 <u>Application Decisions</u> section of the Public Documents page on the Commission's Website; and
- Executive summaries, public meeting minutes, and other materials presented during Commission public meetings, which can be found on the <u>Public Documents</u> page of the Commission's website.

The Legal Department also consults on the maintenance of the Open Data Platform.

Audits

Through this past fiscal year, the State Auditor's Office chose to audit the Commission during the following timeframes:

- July 1, 2022-June 30, 2024, to examine the calculation, collecting, and accounting for fees and fines collected in the Marijuana Regulation Fund (MRF);
- July 1, 2019-December 31, 2024, to examine agency employee settlement agreements.

Additionally, the Auditor reviewed processes and procedures relative to host community agreements (HCAs), which are the required contracts between licensees and the cities and towns in which they operate, as well as related community impact fees (CIFs).

Commission staff met with the Auditor's team for nearly a year and spent hundreds of hours reviewing procedures with the investigators, then provided formal responses to initial findings before the State Auditor's final report was published in August.

In July 2024, the agency had self-identified that a number of administrative extensions had been requested by and granted to Massachusetts licensees without requiring payment of the applicable prorated fees. Once the failure to collect fees was discovered, the Commission began billing for uncollected fees that were identified. To date, the agency has collected more than two-thirds of identified fees and continues to pursue collection of the remaining balance through the State Comptroller Billing and Receivable System.

The Commission also updated its licensing software in July 2024 to accept pro-rated extension applications and fees. Fees are now paid prior to the Commission's granting of an extension, eliminating the need to bill licensees.

It is critically important to note that neither the Auditor nor the Office of the Inspector General, which completed a similar review in March, identified any evidence of fraud by Commission employees in their reports. The Commission's April 17 response to the Inspector General is available. The Commission welcomes ongoing collaboration with the Auditor's team and looks forward to providing updates over FY2026 as needed. More information is available within the agency's online Frequently Asked Questions page at MassCannabisControl.com.

Research

The Commission's Research Department currently consists of a Chief of Research, two Project Coordinators, and two Research Analysts. Despite continued limited staffing and funding, the Commission plans to develop the Center for Cannabis Research and Policy (CCRP) to advance collaboration for cannabis policy research.

Section 17(a) of G.L. c.94G and St. 2017, c.55 requires the Commission to develop a research agenda to better understand the social and economic trends of cannabis in the Commonwealth. The law identifies at least seven categories of study and authorizes an expansion of that scope with the aim of informing future decisions that would aid in the closure of the unregulated marketplace and monitoring the public health impacts of cannabis and cannabis legalization.

Since the Commission completed all one-time research items pursuant to St. 2017, c. 55 in 2022, it is focused on providing updates to metrics pursuant to Section 17(a) of G.L. c.94G. The Research Department publishes two standardized reports in alternating years: 1) Industry Report and the 2) International Cannabis Policy Study (ICPS) Report.

In February, the Research Department published the Commission's 13th comprehensive research report pursuant to G.L. c.94G § 17(a)(iii), G.L. c.94G § 17(a)(iv), and G.L. c.94G § 17(a)(v). This interdepartmental study provides a comprehensive assessment on the cannabis industry, including ownership and employment, diversity, equity and inclusion, among other topics of policy interest, such as testing, a recent public health concern nationwide. Additionally, the Department is currently drafting the next report, using data from the ICPS, for completion in 2026.

The Research Department continues to work internally, as well as collaborate with various state agencies, academic researchers, and other stakeholders to employ primary and secondary data collection methods to examine a spectrum of items. As cannabis policy research gains interest nationwide, the Commission set both long- and short-term goals to ensure its research is high-quality, impactful, comprehensive, and collaborative. Thus, in addition to the Industry Research Report, during FY2025, the Department has also published one peer-reviewed scientific article and gave nine presentations at national scientific conferences, academic institutions, and state government conferences to advance the study of effects on cannabis laws.

The Research Department served as Guest Editors for the first Specialty Update on Cannabis for the scientific journal *Clinical Therapeutics* in July of 2023. Due to the success of the first Specialty Update, members of the Research Department were requested to serve again as Guest Editors for a second full

issue of the scientific journal *Clinical Therapeutics*, focused on the intersection of cannabis research and policy, this time with a focus on medical programs and therapeutics, to be published in January 2026. In this Special Issue, the work of the Commission and colleagues will again highlight Massachusetts' cannabis research and policy to an international audience. Since this issue is Open-Access, all articles are available to anyone interested and continue Massachusetts' trajectory as a leader in applied cannabis research and evidence-based policy.

The Commission sponsored, moderated, and served as a panelist on two Symposiums, including a Plenary at the annual CANNRA External Stakeholder meeting in June: 1) What is "medical cannabis" in the current market and how can we regulate for patient safety? (Symposium, served as Moderator); and 2) What do data and research tell us about the impacts of legalization? (Plenary, served as Panelist). These two presentations included the leaders in cannabis research and policy across the U.S., including Dr. Susan Weiss at the Division of Extramural Research at the National Institute on Drug Abuse (NIDA); Dr. Ryan Vandrey, Professor at Johns Hopkins University Behavioral Pharmacology Research Unit and Principal Investigator on the NIDA Research Registry for the Study of Medicinal Cannabis Use and Health Study; Steph Sherer, Board President and Executive Director of Americans for Safe Access; Dr. David Hammond, Professor at University of Waterloo and Principal Investigator on the International Cannabis Policy Study (ICPS); Dr. Igor Grant, Distinguished Professor of the Department of Psychiatry at the University of California, San Diego School of Medicine and the University of California Center for Medicinal Cannabis Research (CMCR), Heather Krug, Regulatory Programs Branch Chief for the State Public Health Laboratory of the Colorado Department of Public Health and Environment, and Dr. Julie K. Johnson, Chief of Research at the Massachusetts Cannabis Control Commission.

The Research Department also coordinated a Symposium presented at the 2025 Annual Research Society on Marijuana (RSMj) conference entitled, *Ensuring Cannabis Policies aren't Half Baked: Pairing Policy with Science* and featuring CANNRA colleagues, including: Dr. Kaitlin Kosinski, Research Scientist at the New York State Office of Cannabis Management; Dr. Lirit Franks, Research Associate at the University of Utah School of Medicine, and Dr. Julie K. Johnson, Chief of Research at the Commission. This Symposium highlighted the intersection of cannabis research and regulation, as well as the unique Massachusetts experience of a cannabis regulatory governance body including an internal Research Department and the applied cannabis research pursuant to Section 17(a) of G.L. c.94G and St. 2017, c.55.

The Research Department continues to serve on external committees to expand national collaborative efforts. The Chief of Research serves as co-chair on the CANNRA Medical Cannabis Subcommittee working with other state regulators from across the country and is the Associate Editor for policy research for the scientific journal, Cannabis. Research staff are also members and actively participate in the RSMj, Council of State and Territorial Epidemiologists (CSTE) Cannabis Subcommittee, and CANNRA Subcommittees, including hemp, public health and education, and federal policy.

Additionally, it has been a successful year for external grant collaborations to advance G.L. c.94G goals and Commission priorities. The Research Department has successfully contributed to three national grants, including: 1) Impact of cannabis legalization and commercialization on substance use and mental health outcomes in psychosis; 2) Enhancing Opportunities for Addiction Research in the Merrimack Valley; and 3) State Cannabis Surveillance Environmental Scan. Additionally, the Commission was scored high for a fourth grant entitled, The Impact of Cannabis Legalization on Cannabis and Nicotine Vaping/Smoking

among Youth with Mental Illness and anticipate this National Institutes of Health funded grant to be awarded to the Commission in FY2026. The Commission is working to secure an appropriation to receive monies from collaborative grants secured for critical cannabis research in Massachusetts and beyond.

Table 4. Commission Research Products from July 1, 2024 - June 30, 2025

Colby, A., Humiston, G, Johnson, JK. (2025, February). *Review and Assessment of the Massachusetts Adult and Medical Use Cannabis Industries.* Worcester, MA: Massachusetts Cannabis Control Commission.

Johnson JK. Gruber S., Pacula RL., Weiss S. Cannabis Regulators Association (CANNRA) External Stakeholder Meeting, 2024. *Research Spotlight: New Findings on the Health Effects of Cannabis and Cannabinoids and Policy Implications*. Moderator.

Johnson JK, Colby A, Humiston G, Pensky H. Using Publicly Available Cannabis Industry Surveillance Data to Monitor Social Equity Trends. Research Society on Marijuana (RSMj) July 2024. Symposium Presentation.

Humiston G, Colby A, Edwards V, Johnson JK. *Guiding Applied Public Health Researchers through Cannabis Industry Testing Standards and Data.* Council of State and Territorial Epidemiologists (CSTE) June 2025. Oral Presentation.

Johnson JK., Fisher E., Grant I, Sherer S, Vaillencort D. Panel, *What is "medical cannabis" in the current market and how can we regulate for patient safety?* Cannabis Regulators Association (CANNRA) External Stakeholder Meeting, 2025. Moderator.

Schauer G., Hammond D., Vandrey R., Weiss S., Krug, H., **Johnson JK**. *What do data and research tell us about the impacts of legalization*. Cannabis Regulators Association (CANNRA) External Stakeholder Meeting, 2025. Plenary Panel-Panelist.

Invited Lecturer, Wake Forest University. Course, Research Methods, Professor Jeffrey Moyer [Lecturers: Chief of Research, Julie K. Johnson, and Research Analyst, Graelyn Humiston]

University of Massachusetts, Lowell. *Public Health Job Opportunities in State Government*. Professor Ann-Marie Matteucci. February 10, 2025. Invited Panelists: **Julie Johnson, Cannabis Control Commission**, Nicole D. Karlsson, New Hampshire Department of Health and Human Services, Amy Benison, Massachusetts Department of Public Health, and Andrew Robinson, Massachusetts Department of Public Health

Johns Hopkins Bloomberg School of Public Health, Course, *Public Health Perspectives on U.S. Drug Policy*. Professors Sabriya Linton and Fernanda Alonso Aranda. February 11, 2025. Invited Panelists: **Julie K. Johnson and Silea Williams, Cannabis Control Commission**, Kristen Davis-Franklin, Deputy Cannabis Regulation Oversight Officer, Illinois Department of Financial and Professional Regulation, Audrey Johnson, Executive Director, Maryland Office of Social Equity

Julie K. Johnson, *Research at the Massachusetts Cannabis Control Commission*. California Government Cannabis Research Workshop. March 24, 2025. Oral Presentation.

Table 5. Commission collaborative grants received from July 1, 2024 - June 30, 2025

Andy Hyatt, Harvard Medical School and Cambridge Health Alliance [Funded]	Title: Impact of cannabis legalization and commercialization on substance use and mental health outcomes in psychosis. Funding Agency: National Institutes of Health/ NIDA
	Role: Cannabis and Drug Policy Advisor
Dan Berlowitz, University of Massachusetts, Lowell [Funded]	Title: Enhancing Opportunities for Addiction Research in the Merrimack Valley
	Funding Agency: National Institutes of Health/ NIDA
	Role: Fellowship Site Mentor, Cannabis Control Commission
Gillian Schauer, Cannabis Regulators Association [Funded]	Title: CSTE State Cannabis Surveillance Environmental Scan
	Funding Agency: Council of State and Territorial Epidemiologists (CSTE) and Center for Disease Control (CDC)
	Role: Collaborator with CANNRA

CONCLUSION

This eighth annual report identifies the Commission's ongoing operations for FY2025 and documents the continued growth of the regulated medical- and adult-use cannabis industry in Massachusetts. Over the past year, the Commission has anticipated needs, created significant efficiencies, and continued to meet statutory requirements, while also promoting new opportunities for the cannabis marketplace. From expanding opportunities for delivery and small business, to supporting outdoor cultivation, enhancing testing, implementing legislative mandates, and creating three new license types, the Commission has advanced thoughtful reforms to strengthen the industry.

Across all departments, Commission staff have increased transparency and accessibility, launched new tools, expanded data dashboards, and maintained strong oversight to protect public health and ensure licensee accountability. The Testing team issued critical guidance to strengthen laboratory compliance and protect public health, while the Enforcement Division conducted complex investigations and field inspections to ensure licensee accountability. The Government Affairs and Policy team coordinated robust engagement with municipal leaders, law enforcement, legislators, and regulatory peers across the country, contributing subject-matter expertise to inform both state and national cannabis policy.

Looking ahead, energized by Acting Chair Stebbins' reappointment and the arrival of Executive Director Ahern, the Commission is eager to continue building on the progress achieved thus far in implementing evidence-based policy and upholding the public's trust. However, to meet the expectations of the Legislature, Massachusetts residents, and the industry, the agency requires sufficient funding to implement necessary regulatory updates, upgrade outdated IT infrastructure, and expand public education. The Commission's work in FY2025 and plans for FY2026 reflect an ongoing effort to ensure Massachusetts remains a safe, equitable, and effective cannabis industry for all stakeholders. With more than \$8 billion in total sales to date, Massachusetts' market serves as an economic driver and a national leader in responsible regulation, innovation, and prioritizing disproportionately harmed communities.

