New Jersey Cannabis Regulatory Commission
Public In-Writing Comments
Public Meeting: October 29, 2026

Full Name	Meeting Date	Comment
Brandon Parkin	10/29	Dear Chair and Commissioners, I am submitting this comment on behalf of Parks Grove, a New Jersey licensed cannabis microbusiness cultivator and manufacturer, to express serious concern regarding any further increase to the Social Equity Excise Fee (SEEF) and the broader economic challenges facing small cannabis businesses throughout our state. New Jersey established its microbusiness program to create meaningful opportunities for independent entrepreneurs and local businesses that otherwise might not have the resources to compete with large, well-capitalized operators. But creating an opportunity to obtain a license is not the same as creating an opportunity to operate a sustainable business. Increasing the financial burden on microbusiness cultivators without addressing their limited market access threatens to undermine the very small-business opportunities New Jersey intended to create. The Disproportionate Impact on Microbusiness Cultivators Microbusiness cultivators operate under strict limitations on cultivation space, plant counts, staffing, and business size. Unlike larger operators, we cannot simply expand production to offset rising expenses or declining wholesale margins. At the same time, electricity, labor, compliance, testing, insurance, packaging, and facility operating costs remain substantial. An additional per-ounce tax would create another expense at the beginning of the supply chain, where small businesses have limited ability to absorb or offset it. If micro cultivators absorb the increase, already narrow margins shrink further. If they pass the expense along, their products become less competitive. A tax structure that overlooks the difference between microbusinesses and large-scale operators risks accelerating consolidation and pushing independent cultivators out of the market. Social Equity Must Include Economic Sustainability

		We recognize the purpose of the Social Equity Excise Fee and the importance of reinvesting cannabis revenue into communities disproportionately affected by prohibition. However, social equity should not be measured solely by revenue collected. It must also be measured by whether independent businesses can survive, create jobs, support local economies, and build lasting opportunity. Before asking New Jersey's smallest cultivators to contribute more, the State should demonstrate how existing social equity revenues are being deployed and whether those investments are producing meaningful results. Protecting microbusiness viability is itself an investment in social equity. Expanding Economic Opportunity Through Limited Direct-to-Consumer Sales Parks Grove has developed a policy proposal advocating limited direct-to-consumer sales by licensed cannabis microbusinesses at approved farmers markets, public markets, and special events. Currently, small cultivators and manufacturers rely heavily on wholesale relationships and licensed retailers to reach consumers. Although dispensaries are essential partners, microbusinesses face significant disadvantages in obtaining shelf space, building brand recognition, and competing with operators possessing much larger budgets. A limited event-sales program would allow qualified microbusinesses to introduce their own products to consumers and generate demand that can also benefit retail partners. It would not replace dispensaries or create unrestricted retail sales. Testing, packaging, labeling, age verification, inventory tracking, taxation, and public safety requirements would remain intact. New Jersey Already Has a Framework for Supporting Small Producers New Jersey would not need to develop the underlying policy concept entirely from scratch. Through P.L. 2023, c.290, the State established a framework allowing qualifying craft alcohol manufacturers to participate in a limited number of permitted off-premises events. Cannabis requires its own statutory authorization and regulatory safeguards, and we are not suggesting identical treatment. The relevant principle is that New Jersey has already recognized the economic value of allowing smaller, regulated producers carefully controlled opportunities to reach consumers outside permanent licensed premises. Aligning Cannabis Policy With Small-Business Priorities Governor Mikie Sherrill's administration has emphasized supporting small businesses, reducing barriers, and expanding economic

		opportunity. Those priorities should extend to licensed cannabis microbusinesses. Microbusiness owners have invested capital, taken substantial risks, created local jobs, and committed to operating in a heavily regulated industry. Meaningful market access—not simply the issuance of additional licenses—is necessary for that commitment to succeed. A More Balanced Approach We respectfully urge the Commission and state policymakers to refrain from increasing the SEEF while micro cultivators face severe economic pressures; evaluate a reduced or differentiated SEEF structure for microbusinesses; assess how existing SEEF revenue is deployed; and support legislation establishing a limited, cannabis-specific direct-to-consumer event-sales framework. Microbusiness survival, rather than license counts alone, should be a measurable component of New Jersey's cannabis economic-development and social-equity goals. A Direct Question to the Commission Would the New Jersey Cannabis Regulatory Commission support legislation establishing a limited, regulated direct-to-consumer event sales program for licensed cannabis microbusinesses, similar in principle to the framework already established for other small craft producers in our state? We would welcome the Commission's position and its willingness to work with legislators and microbusiness operators to advance such a framework while maintaining cannabis-specific safety and compliance requirements. Closing New Jersey has an opportunity to create a cannabis marketplace where independent cultivators, manufacturers, retailers, and locally owned brands can succeed alongside larger operators. We are not asking for reduced oversight or exemptions from product safety standards. We are asking for economic policies that recognize the differences between small and large operators and provide microbusinesses with a fair opportunity to compete. Increasing taxes while continuing to restrict market access risks creating a system where small businesses are licensed to participate but economically unable to survive. The goal should not simply be to

		license small businesses. It should be to ensure they have a fair opportunity to succeed. Thank you for your time and consideration. Respectfully, Parks Grove New Jersey Licensed Cannabis Cultivator & Manufacturer
Evan Manaresi	10/29	Thank you to the NJCRC for the opportunity to present this comment and for choosing to delay decisions about the SEEF to allow for further consideration. I am Evan Manaresi, I am a NJ native and have lived here all my life. I am also the owner of Bass River Buds a microbusiness Class 1 cultivator licensed in the NJ regulated cannabis market. We are a one of the smallest Cultivators in the state, with a staff of 8 including my brother in law, mother in law, and several friends. We have been operational for almost 2 years and in that time, we have seen prices drop and receive increased pressure from retailers to lower prices and offer discounts. An increase in the SEEF fee will be catastrophic for small businesses like mine. While much larger businesses probably can absorb cost increases, by putting pressure on their suppliers and employees to lower costs and maintain margins, we simply cannot. An increase in taxes will disproportionately negatively affect small businesses that operate on slim margins. I believe that the best market for consumers, regulators, and the industry would be made up of many small businesses. I have heard the NJCRC talk about how they too want to see a diverse industry of many independent NJ businesses. In light of this, I would encourage you to consider waiving the SEEF fee for microbusinesses. I believe that this would create an incentive for businesses to start small and stay small and diverse. I have not done the math, but I know that the production from our cultivation facility is such a small fraction of the market that the reduction in tax revenue would be insignificant. I do know that it will help small NJ craft producers to be MORE competitive in the market, where any flat increase across the entire market will further degrade our ability to be competitive. I also would like to comment on one more concern that makes business very difficult as a small business. Employee and trade sampling is very difficult. As a small brand, we focus on product quality first rather than hype and lots of flashy marketing. However, the regulations (and maybe statutes) restrict us from being able to leverage that quality. Cannabis is a product that is consumed through the senses and the experience it helps create. Whether it be for R&D, quality control, employee samples, trade

		samples, or promotional samples and events, we need to be able to share flower more easily. The current regulations require us to: -test and package finished product -"sell" it to a dispensary for $0.01 -ship it to a dispensary (we use a distributor for compliant transport so we pay them for this) -Pay SEEF fee -"buy" it back from the dispensary for $0.01, not more than 1 ounce at a time And after all of that, we are still prohibited from sharing or giving it to budtenders, dispensary management, customers, etc. The commission has determined that is prohibited by a statute that seems to be intended to stop "sticker sales" where a customer buys some other product and receives cannabis as a gift. I do not know the fix for sampling in NJ. And I understand the NJCRC cannot change statute. But I would ask you to review the situation, determine if the statute is really intending to prohibit licensed cannabis companies from sharing products and promoting their brands. Please find a way to allow cultivators and manufacturers to provide samples directly to their employees. This should include R&D samples that have not been lab tested. As a small business owner, I think my gardeners and trimmers should regularly get to enjoy the fruit of their labor. Thank you for considering my comments about SEEF and sampling. I truly appreciate all of the work the NJCRC does to keep our industry well-regulated and safe. I would be happy to help in any ways I can in the future. As a NJ based, independent microbusiness cultivator, I think we bring a unique and important perspective to the table. Thank you for your consideration, Evan Manaresi President Bass River Buds
Max Jackson	10/29	My name is Max Jackson. I'm the founder of Cannabis Wise Guys, and I co-chair the New Jersey CannaBusiness Association's Cultivation Committee. This comment is my own, not NJCBA's. I don't hold a New Jersey license and I don't pay this fee myself; I'm writing because of what I see growers dealing with, and what the data from around the country says. I spoke on Thursday. On Thursday you waived the November 1 notice deadline and set no rate for 2027. At the close, Chair Laufer, you joked: "I promise it won't be $60, I promise. Maybe $59.99, but not $60." I'll take the first half at

		its word. I believe you, and I'm asking you to put that promise in the rule, so growers can plan a business around it for longer than one December at a time. Here's the conversation I'd rather be having. If this rule didn't set $60 as what happens when prices fall, I wouldn't be writing to you about $60 at all. I'd be writing about what a reasonable rate looks like, and how fast it should be allowed to climb. We can't have it yet, because once prices average under $200, the rule doesn't leave room for a reasonable number. It says $60. Here's why that's not hypothetical. Your own July 16, 2026 slides (p.20) show the average retail price per gram of flower falling every month this year: $7.30, $7.17, $6.94, $6.68, $6.59 and $6.51, January through June. That June price is down almost 22% from a year earlier, by your own numbers. Your rule looks at the average price in the current calendar year, and those six months, every month you've posted, average $6.865 a gram. At a 28-gram ounce that's $192. At a true 28.35-gram ounce it's about $195. Either way it's under $200, and under $200, N.J.A.C. 17:30-3.4(c) doesn't say the fee may reach $60. It says the fee "shall be" $60.00 per ounce. The statute underneath that rule never says that. N.J.S.A. 54:47F-1(a)(2)(d) sets $60 as a ceiling: "up to $60 per ounce… as established by the commission." The Legislature wrote discretion into the law. Your rule turns it into a requirement. Today $60 is the default, and relief takes a waiver vote every year. With "up to," $60 is only the ceiling, and it's not a number this market can survive. Even a fraction of it would land hard on an industry still in its first years. You can fix this yourselves, by rule. Amend 17:30-3.4(c): put "up to" back where the statute put it. $60 is the statute's ceiling, not a target, and nothing in this rule should push the fee anywhere close to it. Add two guardrails while you're at it: a cap on how much the fee can rise from one year to the next, and a cycle longer than twelve months, so growers aren't planning a business around a number that can move every December. On Thursday, other speakers asked you to phase in any increase or keep it small this year. A yearly cap does the same thing, written into the rule so it holds every year, not just this one. Last December, this Commission found that setting that rule aside was "necessary to achieve purposes of the CREAMM Act." An amendment can't be finished before this December's vote. I'm asking you to start it now, so a December waiver stops being the plan. One more ask, in your own words from Thursday: you said the recommendation "will come with some data that we've compiled." Publish that data, and the rate you're proposing, with a real comment

		window before the vote, not after it. This fee is indexed to the average retail price, and the most recent price slide you've posted is June's; there hasn't been one at the three meetings since. Give growers the current number along with the data, so we're commenting on a price we've actually seen. Parts 2 through 6 below give the detail, with a source for every figure. 2. What the number means for a grower, and for New Jersey's market For legal cannabis to beat the illicit market, it has to compete on three things: price, quality, and access. In the parts of New Jersey that aren't a cannabis desert, this market is close to checking all three boxes. Access is the exception: the Commission's own municipal list showed 176 of New Jersey's 564 municipalities, about 31%, allowing cannabis retail as of July. Where legal cannabis does show up, price is the hardest of the three to win on, and price is where this fee lands. I was in California's market from 2018 to 2022, including a year running a licensed cultivation operation in Trinity County. Before that I was in Colorado, Alaska and Oregon in their first year of legalization, and Canada in the first weeks of adult-use sales, and I've followed the data out of every legal state since. New Jersey is starting to find its feet. The quality is here, and the state's independent operators have finally opened their doors. A consumer facing a higher price at a licensed store has three choices, not one: buy less overall, split purchases between the licensed and the illicit market, or go back to an unlicensed seller entirely. Every other cost of living in this state is climbing too, and cannabis doesn't get shopped for in isolation from that. None of those three choices serve the purpose of this fee, or of the CREAMM Act itself, which says it "is designed to eliminate the problems caused by the unregulated manufacturing, distribution, and use of illegal marijuana within New Jersey" and "will divert funds from marijuana sales from going to illegal enterprises, gangs, and cartels." (N.J.S.A. 24:6I-32(c)–(d)). The job of a regulated market is to bring those consumers in, not to fight to hold onto the ones it already has. Operators opening now are entering a maturing market with all the overhead of a brand-new business. They have to ramp up production, pay down the debt from the build, and pay back their investors, while prices are falling, input costs are rising, and this fee could go up. And they do it without the financing other new businesses can count on. SBA loans are closed to any business that grows or sells marijuana, even where state law allows it, and a publicly traded cannabis landlord tells its own investors, in its annual SEC filing, that federal law has "limited the ability of state-licensed industry participants to fully access the U.S. banking system and traditional financing

		sources," and that "[t]hese limitations, when combined with the high costs of maintaining licensed and stringently regulated cannabis facilities, substantially increase the cost of production." By the Commission's own count, cultivators and manufacturers licensed to operate in New Jersey went from 108 combined last December (p.47: 46 cultivators, 62 manufacturers) to 215 in October (p.19: 105 cultivators, 110 manufacturers), almost doubled in ten months; cultivators alone more than doubled, from 46 to 105. The ones just now getting their first product onto shelves are doing it at prices that have already fallen the way Part 1 shows, and this fee's table puts more of the burden on them as prices fall, not less. Since the fee began, the Commission has set it five times: $1.10 an ounce for 2022, $1.52 for 2023, $1.24 for 2024, and $2.50 for both 2025 and 2026, waiving the mandatory table both years to do it. Here's what that table actually charges, per pound at 16 ounces to the pound: today's $2.50 rate is $40. The band the table would have put New Jersey in for 2026, $30, is $480. The next band down, $40, is $640. The band the rule reaches once prices average under $200, $60, is $960 — 24 times what growers pay today, and on this Commission's own posted prices, about a third of the retail price of the ounce it came from. None of this is this year's number. It's what the rule does to the number if this Commission ever lets it run, instead of waiving it again. 3. What happens when customers buy less $60 makes almost any other number look small. That's the wrong comparison. The number growers live with is today's $2.50, which is $40 on every pound. Doubling it to $5 makes that $80. Tripling it to $7.50 makes it $120. Either one is owed on the sale, whether or not the grower has been paid, and in a market where prices are already falling there isn't much margin left to take it from. If it goes onto the shelf price instead, customers make the choices in Part 2: buy less, split their buying with the illicit market, or go back to their guy. The CREAMM Act's own purpose is to keep cannabis sales from going to the illegal market. A higher price works against that purpose the same way a shortage of licensed stores would. New Jersey's customers also have options within driving distance. New York and Maryland already sell adult-use cannabis. Pennsylvania doesn't yet, but any Pennsylvanian who drives here to buy today can stop. If New Jersey can't compete with its neighbors on price, quality and access, a higher rate is charged on fewer sales. A higher rate only raises more money if sales hold. Every customer who buys less, buys illicit or buys across the border is a sale that doesn't.

		4. Growers aren't getting paid, and they front the fee anyway The statute puts the fee on the sale or transfer itself — N.J.S.A. 54:47F-1(a) measures it on "the receipts from the sale, or equivalent value of the transfer." Not on collection. The return is due monthly, by the 20th, and a cultivator has to file it even in a month with zero sales (NJ Division of Taxation, ANJ-30). You heard this from the podium Thursday. One speaker summed up what cultivators had been telling you: they are "already waiting 60, 90, 120 days or more for invoices to be paid," and still owe this fee up front. A grower told you that when they partner with a manufacturer, they "may wait an average of up to four months to see a return," paying costs the whole time. Others asked for a tiered structure by size or a phased approach, so an increase doesn't land all at once on growers still waiting to be paid for what they already sold. This isn't new, and it isn't small. At your May 14 meeting, I told you about one cultivator-manufacturer I'd spoken with that was carrying 74 of 115 accounts overdue, consistently between $600,000 and $1.2 million in unpaid receivables. This fee is owed on every one of those sales, paid or not. Nationally, a 2024 Whitney Economics report, which I cited in my March memo to you, put delinquent receivables across the U.S. cannabis industry at $3.8 billion, and 57.3% of the operators it surveyed said unpaid receivables hurt their business more than federal Section 280E. New Jersey has already solved a version of this problem for other regulated products, just not for cannabis. For alcohol, the Division of ABC caps wholesaler credit at 30 days, and a retailer who doesn't pay gets a Notice of Delinquency that cuts off credit from every wholesaler until it does. For tobacco, the statute lets the Director allow a distributor to remit the tax installment-by-installment, as the customer actually pays it. New Jersey has also written bad-debt relief into the sales tax, the petroleum products tax, and the motor fuel tax. The Social Equity Excise Fee has none of these: no credit cap, no installment option, no bad-debt deduction. The statute's only answer to nonpayment is that a cultivator can go after its own customer for the fee, the same way it would go after the unpaid price, and the Director of the Division of Taxation has to be made a party to any lawsuit to collect it. Some of this is yours to fix, and some of it isn't. In May I asked this Commission directly to open rulemaking on a trade credit enforcement framework for cannabis licensees, modeled on the ABC system — a 30-day credit cap and a cash-on-delivery status for buyers who don't pay. That's within your own authority, and it's still open. Bad-debt relief for this fee, like the sales, petroleum, and motor fuel taxes already have, is a question for the Legislature, not

		for you; I'm raising it here because it bears on what you're deciding — a rate increase lands hardest on a grower carrying unpaid invoices. Scaling the fee, or its rate of increase, by operator size is the same kind of ask: if this Commission doesn't have the authority to do that by rule, that's also a question for the Legislature, and I'd ask you to say so in whatever you send them. 5. Where "shall be" came from The statute has said "up to" since it was enacted in 2021 and still does: N.J.S.A. 54:47F-1(a)(2) sets four ceilings — up to $10, $30, $40, or $60 per ounce — "as established by the commission." The Commission's first rule, effective August 19, 2021, had no tier table. It set the fee by a formula, one-third of one percent of the statewide average retail price of an ounce, with the amount noticed in the Register each November 1. The tier table was added in 2022, when the Commission re-adopted its full set of rules. The proposal (54 N.J.R. 1470(a), p.67) deleted that open-ended notice mechanism and inserted the table now at 17:30-3.4(c), adopted effective March 6, 2023 (55 N.J.R. 402(a)). The proposal's own stated reason for the change is one sentence: the new subsection "is added to set forth the amounts of the Social Equity Excise Fees." Its social impact statement describes the result — "a fee on cultivation that increases as the retail price drops" — but states no reason for making the ceiling mandatory rather than discretionary. When the rules were adopted, the Commission published a summary of every comment it received, along with its responses. Two comments touched 17:30-3.4, and neither one addressed the tier table, the dollar amounts, or the "shall be" wording. The Commission approved the entire readoption package, including the new table, at its June 30, 2022 meeting with no recorded discussion. I found no stated reason, in the proposal, the adoption, or that meeting, for making the statute's ceiling a mandatory table. Since then, the Commission has waived its own table twice. For 2025 (Resolution 2024-298) and for 2026 (Resolution 2025-12-17-02), it set the rate under the statute's separate discretionary authority instead of the mandatory table. Its December 2025 resolution puts it this way: waiving the table was "necessary to achieve purposes of the CREAMM Act." That same resolution shows the math: it puts the price at $251.06, in the table's $250 to $350 band, where the table sets the fee at $30.00 per ounce. Separately, the Commission has also waived the rule's November 1 notice deadline two years running, in October 2024 (Resolution 2024-297) and October 2025 (Resolution 2025-10-01-01), each time on a finding that it "needs more time past the November 1 deadline" — and then set the rate in

		mid-December, 15 to 20 days before it took effect. Thursday made it three Octobers in a row. A rule this Commission has had to set aside twice to serve the Act is a rule worth fixing, not waiving a third time. That's the amendment I'm asking for. 6. What other states are learning California eliminated its own per-ounce cultivation tax — $10.08 per dry-weight ounce of flower — effective July 1, 2022. Not reduced. Not phased down. The state chose to zero it out. The $30.00 an ounce the table sets at the price in this Commission's own December 2025 resolution is nearly three times the rate California eliminated. Nevada is working through the same question right now, from the other direction. A subcommittee of Nevada's Cannabis Advisory Commission studied whether to eliminate Nevada's 15% wholesale cannabis tax and what retail rate would replace the revenue. Its report, issued September 4, took no position either way: "The subcommittee does not make a recommendation as to whether the Wholesale Cannabis Tax should be eliminated." But its findings are worth reading regardless of what it recommended. The report found the wholesale tax is "typically baked into the retail price," and that patients and recreational consumers "indirectly shoulder the wholesale tax burden." Its model assumes that if the tax were eliminated, cultivators would keep the former 15% "as an offset to prior lost margins." Over the same years, as prices kept falling, cannabis tax money transferred to Nevada's State Education Fund went from $159 million in FY2021 to $95.8 million in FY2025, which the report calls "a 40 percent decrease." Nevada's tax is a percentage, so it falls with the price. New Jersey's rule works the other way: the fee rises as the price falls. Michigan is a step further along. Its 24% wholesale tax took effect January 1, 2026. Two days before your meeting, on October 28, a bill was introduced there, House Bill 6440, that would suspend that tax for one year. Michigan's cannabis industry association said a 12-month pause "will give what's left of our cannabis businesses time to stabilize and keeps customers in the regulated market, instead of driving them to the illicit market." None of these tells you what this year's number should be. All of them tell you the same thing I'm asking for: a tax on cannabis supply needs a structure that survives a falling market, or it gets fixed one waiver at a time. I support what this fee is for. A rate that shrinks the sales it's charged on pays for less of what it's for. I'm not asking you to do away with it.

		I'm asking for a rate that stays far from $60, and a rule that doesn't hand growers a number they can't plan around every December. _____ Sources • N.J.S.A. 54:47F-1 (Social Equity Excise Fee statute, P.L.2021, c.16, §39) • N.J.A.C. 17:30-3.4, 17:30-3.7 (SEEF rule and waiver power) • 54 N.J.R. 1470(a) (2022 readoption proposal) and 55 N.J.R. 402(a) (2023 adoption, incl. Summary of Public Comments and Agency Responses) — New Jersey Register notices • CRC public meeting, June 30, 2022 (transcript) • CRC Resolution 2022-48 (2023 rate, $1.52/oz) • CRC Resolution 2023-142 (2024 rate, $1.24/oz) • CRC Resolution 2024-297 (Nov. 1 deadline waiver, 2024) • CRC Resolution 2024-298 (2025 rate, $2.50/oz, waiver) • CRC Resolution 2025-10-01-01 (Nov. 1 deadline waiver, 2025) • CRC Resolution 2025-12-17-02 (2026 rate, $2.50/oz; waiver; $251.06 average price) • CRC July 16, 2026 public meeting slides, p.20 ("Adult Use Bud/Flower Price Per Gram") • CRC December 17, 2025 public meeting slides, p.47 ("Businesses Licensed to Operate under CREAMM Act": 46 cultivators, 62 manufacturers, 397 total) • CRC October 29, 2026 public meeting slides, p.19 ("Businesses Licensed to Operate under CREAMM Act": 105 cultivators, 110 manufacturers, 644 total) • NJ CRC, municipal opt-in list (Class 5 retail, as of July 2026) • CRC public meeting slide decks with no price-per-gram slide: Aug. 6, 2026, Sept. 9, 2026, Oct. 29, 2026 • Heady NJ, "NJCRC Pushes SEEF Tax Review, Fines Companies $105,000" (Oct. 29, 2026), reporting the Chair's closing remark • NJ CRC public meeting, October 29, 2026 (video; Chair's remarks ~1:31, 1:44, 2:53; other speakers ~2:31–2:34, ~2:43–2:44) • N.J.S.A. 24:6I-32(c)–(d) (CREAMM Act findings) • New York Office of Cannabis Management; Maryland Cannabis Administration; Pennsylvania HB 1200 (2025), passed the House 102–101 on May 7, 2025 • Innovative Industrial Properties, Inc., Form 10-K for FY2025 (Business: Access to Capital) • U.S. Small Business Administration, SOP 50 10 (marijuana businesses ineligible) • NJ Division of Taxation, ANJ-30 (SEEF filing guidance) • N.J.A.C. 13:2-24.4 (alcohol wholesaler credit regulation) • N.J.S.A. 54:40B-4 (tobacco/vapor tax, installment remittance) • N.J.S.A. 54:32B-12.1 (sales tax bad-debt relief) • N.J.S.A. 54:15B-14 (petroleum products gross receipts tax, bad-debt relief)

		• N.J.S.A. 54:39-137a (motor fuel tax, bad-debt relief) • NJ CRC public meeting transcript, May 14, 2026 (Max Jackson public comment, receivables figures) • Whitney Economics / PRNewswire, "Cash-Starved Cannabis Operators Topped $3.8 Billion In Delinquent Payments In 2023" (March 29, 2024) • Whitney Economics, "Cannabis Delinquencies: An Existential Threat to the U.S. Cannabis Industry" (executive summary) • CDTFA Special Notice L-720 (California cultivation tax rate, $10.08/oz) • CDTFA Special Notice L-856 ("Cultivation Tax Ends on July 1, 2022") • CA Department of Finance, State Budget 2022-23 (Enacted), p.139 • Michigan House Bill 6440 of 2026, as introduced Oct. 28, 2026 (amends MCL 205.905) • Michigan Department of Treasury, Wholesale Marijuana Tax (24%, effective Jan. 1, 2026) • Marijuana Moment, "Michigan GOP Lieutenant Governor Candidate Files Bill To Suspend Marijuana Tax Increase" (Oct. 29, 2026), quoting MiCIA Executive Director Robin Schneider • Nevada Cannabis Advisory Commission, Subcommittee on Taxation, "Report and Recommendation" (Sept. 4, 2026)
Frederick Nelson Lindsley	10/29	Good morning, Commissioners. I want to address two issues threatening the financial stability of New Jersey's licensed cannabis industry: a potential increase in the cultivation-related Social Equity Excise Fee and the growing problem of unpaid wholesale invoices. First, I strongly urge the Commission to reconsider any increase in cultivation taxation under current market conditions. California provides a clear warning about the consequences of this approach. California implemented a weight-based cultivation tax that eventually reached $10.08 per ounce. As wholesale prices declined, that fixed tax consumed an increasingly large percentage of cultivators' revenue. This contributed to financial pressure on licensed operators, making it more difficult for them to compete against an illicit marketplace that did not bear comparable tax or regulatory costs. California ultimately eliminated its cultivation tax in July 2022. New Jersey should learn from that experience rather than repeat it.

		According to data presented at the CRC's July 2026 meeting, average retail flower prices declined approximately 21.8% over the preceding twelve months, from $8.33 to $6.51 per gram. Meanwhile, cannabis transactions increased approximately 26%. That tells us something important: market activity is increasing, but revenue per gram of flower is declining. Increasing a weight-based cultivation fee during significant price compression risks intensifying the financial pressure already facing licensed operators. It also threatens the long-term tax base. If higher costs contribute to business closures, reduced legal-market competitiveness, or additional illicit-market sales, the state risks losing sales tax revenue and other economic benefits. I support the purpose of the Social Equity Excise Fee. But social equity requires a financially sustainable legal industry. My second concern is the growing accounts receivable problem in New Jersey's wholesale cannabis market. Cultivators and manufacturers are delivering products, paying employees, covering production costs, and meeting regulatory obligations, while some retailers are failing to pay their wholesale invoices within agreed terms. When invoices remain unpaid beyond 90 days, suppliers effectively become involuntary lenders to retailers. This transfers financial risk upstream and creates serious cash-flow problems for cultivators and manufacturers. I propose that the CRC evaluate establishing a state-authorized commercial credit reporting system for licensed cannabis retailers. Under this framework, verified invoices more than 90 days past due could be reported to a confidential credit registry accessible to licensed wholesale suppliers. Retailers would receive notice and an opportunity to dispute inaccurate balances, with safeguards for legitimate payment disputes. This would allow suppliers to evaluate payment risk before extending additional trade credit, without restricting retailers' ability to purchase products. It would also encourage financial accountability and reduce the risk of unpaid receivables destabilizing the supply chain. These two issues are directly connected. We cannot continue increasing the financial obligations of cultivators while those same businesses struggle to collect payment for products they have already delivered. I respectfully ask the Commission to refrain from increasing the SEEF

		until a comprehensive economic impact analysis has been completed, and to begin evaluating a legally authorized commercial credit reporting framework for the cannabis industry. A sustainable cannabis industry requires reasonable taxation, reliable payment practices, and financial accountability throughout the supply chain. Thank you for your time.
Sarah Volfman	10/29	As someone who currently works in a cannabis manufacturing facility, I can confidently say NJ needs cultivators. If growers are put in increasingly tighter financial restraints, it will not only destroy the cultivation market, but secede it to larger monopolies. Furthermore, without quality and care put into growing, the manufacturing market would collapse as well. Manufacturers would no longer have access to quality material, and in time, would cause further monopolies in the market. If our goal is to continue a flourishing industry, support diversity, and social equity, the CRC must take into account the devastating ramifications of a continually increasing SEEF.
Sue DeGregorio -Rosen	10/29	We are now in the sixth year of Bill S1758, medical cannabis home grow, sitting trapped behind a one person blockade by Senate President Scutari. Since 02/09/2021, this legislation has been denied even the opportunity for an informational hearing.....NJ Cannabis patients and families are suffering right now, and they are depending on us to fight for their rights. "The winners in life create the reality of the futures in their minds, but then take action to make it happen. They understand that W-I-N means work it now and realize the beautiful promise that in order to win, sometimes we just have to sweat, period" Waldo Waldman.
Maria Lindell	10/29	I am confused about what's going to be the situation after the cbd ban coming this December. I am a senior who depends on full spectrum cbd for day-to-day day management of my wellness. Can someone please address this and how its going to effect me? How is it that the dispensaries here in NJ are allowed to sell the banned products but they have no interest in doing so. What is the latest legislation on my ability to legally purchase cbd full spectrum flower in bulk or in any capacity? What will happen to the cbd farms in NJ?
Anonymous	10/29	How does the NJ-CRC protect operators and investors from predatory investment practices? How does the NJ-CRC prevent well-connected attorneys from structuring predatory agreements or using their relationships with the Commission to retaliate against license holders?

		Does the NJ-CRC currently have a confidential channel through which license holders can report or discuss predatory conduct without fear of retaliation? What specific safeguards does the CRC have to prevent a licensee or investor from being subjected to regulatory enforcement, investigation, or other adverse action in retaliation for a private business dispute? Does the CRC have discretion to enforce one regulation while declining to enforce another, and what safeguards prevent that discretion from being used to retaliate against a licensee?
Ken Wolski, RN, MPA	10/29	What action can the NJ CRC take to coordinate the integration of medicinal cannabis into New Jersey's healthcare facilities? On Oct. 30, 2024, I sent the below comment to the NJ CRC Commissioners. Nothing has happened since then in regard to access to medicinal cannabis in healthcare facilities. The issue is even more compelling now, two years later. The Justice Department and the DEA announced on 4/23/26 the issuance of an order (published 4/28) immediately placing marijuana products regulated by a state medical marijuana license in Schedule III of the Controlled Substances Act. "The order also recognizes that state medical cannabis programs are part of the medical access landscape. State systems already regulate patient access, licensing, dispensing, labeling, packaging, security, disposal, and recordkeeping. The order relies on this existing state infrastructure to promote medical benefits and avoid unnecessary disruption to patients and state systems. The order recognizes medical cannabis patient registration as equivalent to a prescription." https://www.justice.gov/opa/media/1437751/dl NJ CRC: Prepare for Institutional Caregivers Now I am glad to hear that the New Jersey Cannabis Regulatory Commission's "Permitting and Licensing Committee" is leading policy discussions on implementing Institutional Caregivers. However, I disagree with the committee's finding that legal issues need to be resolved before further steps are taken.

		Institutional Caregiver policy development and stakeholder engagement should currently be in process in anticipation of the resolution of legal concerns. The federal Justice Department and its component agencies have been barred from interfering in state-legal medical marijuana programs under a congressional appropriations rider that's been annually renewed for a decade. There are no legal issues that will not be overcome to permit Institutional Caregivers in healthcare facilities. Institutional Caregivers will be allowed to come into healthcare facilities and administer to patients the medicinal cannabis that has been recommended for them by licensed physicians, and purchased from Alternative Treatment Centers in New Jersey. This will be the law in New Jersey. For healthcare facilities to forbid implementation of Institutional Caregivers will place them out of compliance with the law, needlessly jeopardizing the health and safety of patients who are in their care. Policy development among healthcare facilities should be on-going. These policies must include documentation of medicinal cannabis that is administered to the patient, along with the inclusion on the Patient Care Plan of the patient's status in the Medicinal Cannabis Program (MCP). How can a facility be allowed to deprive a patient of a duly approved medicine they are already using? Healthcare facilities should be more concerned about the legal consequences of doing harm to patients by forbidding access to medication that has stabilized their conditions. Any other concerns about cannabis can be dealt with by having patients sign "Hold Harmless" agreements. Moreover, the use of cannabis in healthcare facilities is an established fact in the U.S. In 2021, California passed Ryan's Law, which allows terminally ill patients who have a valid medical cannabis card, to use medical cannabis in a healthcare facility, even though cannabis is an illegal Schedule 1 controlled substance under federal law. The population of patients in New Jersey's MCP is continually diminishing. This is partly because some of the sickest patients in the state--those currently in healthcare facilities-- are not allowed access to medical cannabis.

		Institutional Caregivers will greatly expand the number of patients served, expand the success of this program, and improve patient care. Thank you for your attention to this issue.