

Medical Cannabis v. Adult Use Cannabis  
Differences in Local Regulation and Oversight  
Related to Non-Cultivation Uses  
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Medical	Adult Use
17 license types	19 license types – including Type 5 for large cultivation sites (over 22,000 square feet mixed light and 1 acre outdoor) No Transportation License Add Microbusiness Retailer instead of Dispensary
Maximum two (2) licenses per license category	No prohibition of vertical integration with the exception that ‘testers’ can only be ‘testers’
Cultivators send product to distributor for testing (required) and for other purposes as desired	No requirement to send product through distributor
Must be CA resident	Must be CA resident until Dec 31, 2019, then opens up to non-CA residents
Does not allow on-site consumption	Local government can allow for on-site consumption at retailer or microbusiness
No discussion of ‘excessive concentration’ of dispensaries	Requires State to deny a retail or microbusiness if concentration in census tract is more than in the County, is more than allowed by County ordinance or within 600’ of another cannabis business.
Obtaining a State license requires local approval	Local jurisdictions may or may not choose to regulate adult use cannabis. Local permits are not a requirement to obtaining a State permit. Conversely, a local jurisdiction may prohibit adult use marijuana use and business altogether.
Type 6 = Manufacturer 1 ( <i>Using non-volatile solvents</i> ) Type 7 = Manufacturer 2 ( <i>Using volatile solvents</i> ) Type 8 = Testing Type 10 = Dispensary; General Type 10A = Dispensary; No more than three retail sites Type 11 = Distribution Type 12 = Transporter	Type 6 = Manufacturer 1 ( <i>Same as MCRSA</i> ) Type 7 = Manufacturer 2 ( <i>Same as MCRSA</i> ) Type 8 = Testing ( <i>Same as MCRSA</i> ) Type 10 = Retailer ( <i>Includes retail sale and delivery</i> ) Type 11 = Distributor ( <i>Same as MCRSA but not mandatory</i> ) Type 12 = Microbusiness ( <i>Can cultivate up to 10,000 sf. <u>and</u> also act as a licensed distributor, Level I manufacturer and retailer</i> )  <b>**All licenses issued for Adult Use would be distinct from those issued for medical use, and would be designated as such. E.g., an outdoor cultivator for <i>medical</i> cannabis would receive a “Type 1” license, whereas a <i>non-medical</i> outdoor cultivator would receive a “Type 1 – Nonmedical” or “Type 1NM” license.</b>

