July 16, 2026

To: West Virginia Office of Medical Cannabis
From: Mackenzie Slade, Chief Executive Officer, Cannabis Public Policy Consulting (CPPC)
Re: Public Comment on Proposed Rule 64CSR112 - Medical Cannabis Program: Dispensaries

Dear Office of Medical Cannabis,

CPPC appreciates the opportunity to submit comments regarding proposed amendments to West Virginia Legislative Rule 64CSR112, Medical Cannabis Program: Dispensaries. As an organization specializing in cannabis regulatory implementation, public health protections, and consumer-facing market transparency, CPPC appreciates the Office of Medical Cannabis's continued efforts to maintain clear dispensary standards related to patient verification, dispensing practices, labeling, inventory management, and compliance oversight.

CPPC encourages the Office to consider whether the labeling provisions could be strengthened through the use of QR codes or equivalent scannable technology that connects patients to standardized product, testing, and safety information. This would build on the existing labeling framework without requiring every detail to appear on the physical package. CPPC supports West Virginia's continued emphasis on patient safety and clear product disclosures. At the same time, physical labels and inserts are limited in space and can become difficult for patients to interpret when they must include product identifiers, cannabinoid information, dosing information, warnings, and other required statements. A label-to-landing-page model could preserve the core information required on the package while giving patients direct digital access to more complete, mobile-friendly, and product-specific information.

Specifically, CPPC recommends that West Virginia consider requiring both the Certificate of Analysis (COA) and standardized product information to be automatically available to patients through a QR code or equivalent scannable technology generated through, or directly interfacing with, the state's electronic tracking or seed-to-sale system. This approach would be stronger than a QR code linking only to a licensee or brand website because it would provide a more consistent, neutral, and reliable source of product verification, testing information, and patient-safety content across dispensaries and product types. A state-generated or state-interfaced QR code could provide access to batch-specific COAs, product identifiers, testing status, cannabinoid and terpene profiles, serving size and dose information, ingredient and allergen information where applicable, licensee information, recall notices, and patient-safety resources. The physical label would continue to provide the most essential information at a glance, while the QR code landing page could provide expanded context, full laboratory documentation, and more detailed patient education in a format that can be updated more efficiently over time.

CPPC's recent white paper, *Transparency as Value: Past-Month Cannabis Consumer Responses to QR Code-Enabled Cannabis Product Information*, provides additional support for this recommendation. The study examined consumer responses to a state-issued, Metrc-branded QR code landing page that included confirmation of regulatory compliance, product information, laboratory testing results, cannabinoid and terpene profiles, licensing information, recall notifications, and public health resource links. In particular, the study found that consumers viewed QR code-enabled product information as more than a convenience feature. Consumers perceived state-issued QR code information as a tool for distinguishing regulated cannabis products from unregulated products and as a visible signal of regulatory oversight. The study also found broad support for standardized implementation of state-issued QR code transparency across cannabis product categories, suggesting that consumers may increasingly understand access to product, laboratory, and regulatory information as an expected feature of a mature regulated cannabis market.

These findings are especially relevant in a medical cannabis program, where patients may rely on product labels and dispensary staff to understand dose, potency, testing status, warnings, and proper use. A QR code connected to the state's regulatory data environment could help patients independently access product-specific safety information at the point of purchase or use. It could also support caregivers, practitioners, dispensary staff, regulators, and enforcement personnel by creating a consistent source of truth for product information.

Packaging and labeling requirements must balance patient protection, operational feasibility, and regulatory oversight. QR code-enabled access to COAs and product information advances all three goals. It reduces pressure to place every detail on the physical label, gives patients timely access to product-specific safety information, creates a more efficient channel for recall notices and public health advisories, and helps distinguish regulated, tested medical cannabis products from unregulated products. Importantly, it also makes the state's oversight function visible to patients in a simple and accessible format.

CPPC appreciates the Office's thoughtful work to maintain clear and operationally sound dispensary rules. CPPC encourages the Office to consider QR code-enabled access to COAs and standardized product information as a future-facing enhancement to West Virginia's labeling framework. Thank you for considering these comments and for your continued leadership in protecting public health, improving transparency, and supporting the integrity of West Virginia's regulated medical cannabis marketplace. CPPC remains available to provide further information upon request.

Sincerely,
Mackenzie Slade
Chief Executive Officer
Cannabis Public Policy Consulting (CPPC)