

## Legislative Report

**Date:** 12/01/25

**To:** Governor Tim Walz, State of Minnesota  
Michelle Yurich, Executive Director, Legislative Coordinating Commission  
Ryan Inman, Revisor of Statutes  
Representative Erin Koegel, Co-Chair, Commerce Finance and Policy Committee  
Representative Tim O'Driscoll, Co-Chair, Commerce Finance and Policy Committee  
Senator Matt Klein, Chair, Commerce and Consumer Protection Committee

**CC:** Members of the House Commerce Finance and Policy Committee and Senate Commerce and Consumer Protection Committee

**From:** William Reynaga, Interim General Counsel, Office of Cannabis Management

### **Subject: Annual Report on Obsolete, Unnecessary, or Duplicative Rules, as Required by Minnesota Statutes, section 14.05, subdivision 5**

Dear Governor Walz, Director Yurich, Revisor Inman, Representative Koegel, Representative O'Driscoll, Senator Klein, and Committee Members,

Each year, agencies must submit to the governor, the Legislative Coordinating Commission, the policy and funding committees and divisions with jurisdiction over the agency, and the Revisor of Statutes, a list of any rules or portions of rules that are obsolete, unnecessary, or duplicative of other state or federal statutes or rules, as required by Minnesota Statutes, section 14.05, subdivision 5.

In 2025, the Office of Cannabis Management (OCM) has identified the following Minnesota Rules as being obsolete, unnecessary, or duplicative following statutory changes made in the 2025 legislative session:

- 9810.2300, subpart 8A. This rule was made obsolete by the subsequent 2025 amendment to section 342.36, subdivision 6.
- 9810.2300, subpart 9. This rule was made obsolete, in part, by the subsequent 2025 amendment to section 342.36, subdivision 6 as follows, "Vehicle occupants. ~~A cannabis delivery vehicle that is transporting regulated products must be staffed by at least two individuals, and at least one individual must remain with the vehicle at all times.~~ All occupants of a cannabis delivery vehicle must be cannabis workers employed by or contracted with the cannabis transporter who. . ."
- 9810.2502, subpart 6. This rule was made obsolete, in part, by the subsequent 2025 amendment to section 342.51, subdivision 2 as follows, "Before distributing medical cannabis flower and medical cannabinoid

products to a patient or caregiver, **a pharmacist or certified medical cannabis consultant** must apply a patient-specific label to the medical cannabis flower and medical cannabinoid products in accordance with part 9810.1402 (emphasis added). The 2025 amendment permits “an employee,” not only a certified medical cannabis consultant or a licensed pharmacist under chapter 151 to perform distribution requirements.

- 9810.4001, subparts 1B and 3C. These rules were made obsolete, in part, by the subsequent 2025 amendment to section 342.63, subdivisions 2(2) and 3(a)(3) which removed the ability to label certain products by volume which was permitted in the rules. The deletion of “volume” in both section 342.63, subdivisions 2(2) and 3(a)(3) would no longer permit that labeling in part 9810.4001, subparts 1B and 3C.

The office will address the identified list in the next round of rulemaking. If you have any questions regarding this report, please contact me as provided below.

Sincerely,

William Reynaga

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