



Mille Lacs Band of Ojibwe
Department of Cannabis Regulation
Cannabis Regulations

October 27, 2025

NOTICE OF ADOPTION

Pursuant to 15 MLBSA § 1203(f)(iii)(B), this serves as the official Notice of Adoption the following:

Cannabis Regulation – 6: SECURITY

Summary of changes, to CR – 6: SECURITY include:

This Regulation implements 15 MLBS §§ 1201-1225 (hereinafter referred to as the “Code”) and relevant provisions of the Compact, Attachment A. The purpose of this Regulation is to provide guidance over the security and transportation of cannabis businesses are essential to ensure public safety, prevent theft and diversion of cannabis products, and to maintain compliance.

Pursuant to 15 MLBSA § 1203(f)(ii): The Department of Cannabis Regulation reviewed the comments received during the comment period, beginning September 8, 2025, and closing October 9, 2025. The Department of Cannabis Regulation hereby responds to comments below and makes changes as applicable.

Comment 1: CR 6. Changes to clarify and ensure consistent use of calendar days vs. business days, capitalization, internal reference, spacing and tab size were made.

Comment 2: Section 2.3.1.b- Required Security Measures. Could we align with state language concerning perimeter surveillance at entry and exit points? Agreed, Change Applied.

- Change: “24-hour video surveillance ~~of the interior, exterior view of all entry points, and all parking lots.~~”
- The Department acknowledges the cost prohibitive nature of surveillance video retention and changes the requirement to, “24-hour video surveillance.” Note, that section 2.2.1 of this regulation still requires surveillance security measures to adequately protect: business assets, facilities, regulated products, workers, visitors, and community.

Comment 3: Section 2.3.1.c- Required Security Measures. Can language be added to reflect the low-light requirements of infrared (IR) cameras, or is this considered implicit? No Change Needed.

- Infrared cameras would meet standard, “wattage sufficient for video surveillance of the covered area.”
- The Department acknowledges the varying needs for lighting in different areas for safety, security, and general camera function. Note, that section 2.2.1 of this regulation still requires lighting security measures to adequately protect: business assets, facilities, regulated products, workers, visitors, and community.



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Comment 4: Section 5.1.1.b- Unauthorized Access. Does locking a motor vehicle door meet the requirement for preventing unauthorized access? No Change Needed.

- Yes.

Comment 5: Section 6.1- Alarm Requirements. Do these requirements apply to outdoor cultivation sites? No Change Needed.

- Yes.
- Note, that section 2.2.1 of this regulation requires alarm security measures for all cannabis businesses adequately protect: business assets, facilities, regulated products, workers, visitors, and community.
- Per Tribal-State Cannabis Compact, Attachment A, 9810.1500 Subp. 15. “Outdoor cultivation areas. A cannabis business must ensure that an outdoor cultivation area is enclosed by fencing and locked gates to prevent access to the area by unauthorized persons. A cannabis business must ensure that all fencing and gates are secure, are at least six feet high, and obscure or have a cover that obscures the fenced area from being readily viewed from outside the fenced area. A cannabis business must ensure that fencing around an outdoor cultivation area on the business's premises is commercial or security grade, is not agricultural or residential grade, and is designed to prevent access to the cultivation area by unauthorized persons.”

Comment 6: Section 6.1.2- Alarm Requirements. Could you clarify the definition of “public entry point”? Is this term defined elsewhere? No Change Needed.

- The Department refers to an entrance to a building or premises that is customarily used by the general public, excluding fire exits and special employee entrances. A definition will be added to the regulations.

Comment 7: Section 7.2.3.a- Requirements for Video Surveillance Systems. While we acknowledge the tribal-state compact requirements, may we propose reducing the video retention period to 30 days? Agreed, Change Applied.

- The Department acknowledges the cost prohibitive nature of surveillance video retention and changes the minimum retention requirement from 90 to 30 calendar days.

Comment 8: Section 7.2.3.a- Requirements for Video Surveillance Systems. Would motion-detection standards be acceptable in lieu of continuous recording, especially in low-activity areas? No Change Needed.

- This is acceptable.

Comment 9: Section 7.3.1.c- Maintenance of Video Recordings. For consistency and cost-efficiency, may we also suggest a 30-day retention period here? Agreed, Change Applied.

- The Department acknowledges the cost prohibitive nature of surveillance video retention and changes the minimum retention requirement from 90 to 30 calendar days.



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Effective Date: October 27, 2025.

The Department of Cannabis Regulation attached the final version illustrating the updates made as a result of reviewing the comments submitted. Copies of this regulation can be obtained at the Department of Cannabis Regulation and at [Department of Cannabis Regulation \(DCR\) | Mille Lacs Band of Ojibwe](#).

A handwritten signature in blue ink, appearing to read "Hesta Hg", is written over a horizontal line.

Department of Cannabis Regulation Board

October 27, 2025

Date