



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 – 10: RETAIL

Summary of changes, to CR – 10: RETAIL 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 to Cannabis Retailers, their employees and agents in the operation of cannabis retail facilities, as well as the regulatory and enforcement duties of the Department in overseeing those operations.

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 10. 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 3.3- Retail Area. Can you confirm that vendor employees must also be at least 21 years old to service us? Anyone beyond Public Access Areas is fully escorted—correct? No Change Needed.

- Regarding vendor age restrictions, the following regulation is included in the Department’s draft General Operations regulation, “Procedures for verifying that all employees, visitors, contractors, and customers are age 21 or older (except for contractors not involved in the handling of cannabis plants, cannabis flower, artificially derived cannabinoids, or cannabinoid products).”
- Regarding escort requirements, per Code, “a contractor of the cannabis business whose scope of work will not involve the handling of cannabis flower or cannabinoid products and, if the individual is working in an area with immediate access to cannabis flower and cannabinoid products, the individual is supervised at all times by a cannabis worker employed by the cannabis business.”

Comment 3: Section 3.4- Restricted Access Areas. Does this include the fulfillment area and safes? No Change Needed.



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- Yes, fulfillment areas and safes would be considered “restricted access areas.”
- “Restricted Access Area” means any area of a cannabis facility where access is restricted and the general public is not allowed.

Comment 4: 3.4.2- Entry Logs. Do swipe records capture exit times, or is a second swipe required upon exit? No Change Needed.

- Per Tribal-State Cannabis Compact, Attachment A, 9810.2501, “A retailer must maintain an entry log that records the entry of [authorized personnel] to restricted access areas that includes: (1) the individual’s name; (2) the date of the individual’s entry; (3) the time of the individual’s entry; (4) and the time of the individual’s exit.” The cannabis business can choose the method and means of logging access.

Comment 5: 3.7.2.b- Terminology. Can we replace “in a store” with “Public Access Area” to support drive-thru, walk-up, or curbside delivery? No Change Needed.

- Requirements for in-store preorders, referenced in this section, are enforceable by the Tribal-State Cannabis Compact, Attachment A, 9810.2501, subp. 5.
- Alternative sales methods are referenced in another section of this regulation.

Comment 6: 3.8.2 & 3.8.3- Testing Variance. Should these sections reflect the 15% variance allowed under OCM regulations? No Change Needed.

- Per Tribal-State Cannabis Compact and CR-11, Testing, cannabis businesses growing and manufacturing cannabis and cannabis products are required to comply with all cannabis testing requirements. Licensed cannabis test facilities shall follow Minnesota Cannabis Technical Authority acceptance criteria for all analytes and limits, including the 15% variance threshold. This process should be complete prior to cannabis and cannabis products reaching retail store shelves.

Comment 7: 4.2.1- Scope. A cannabis retailer shall only sell cannabis retail products. Does this apply to merchandise, paraphernalia, hemp-derived products, etc.? Change Made.

- Non-cannabis merchandise sales are expressly authorized in Code. This section did seem conflicting. All of 4.2.1 is deleted.

Comment 8: 4.2.2- Sales Options. Can we confirm that walk-up, drive-thru, and curbside sales are permitted? Changes Made.

- The following change was made to make this section better align with the Code and allow for varying methods of delivery to the end customer, “A cannabis retailer must designate retail area(s) where customers are permitted to purchase cannabis and cannabis products.”

Comment 9: 4.3- Curbside Delivery. Do walk-up and drive-thru options fall under this section? Changes Made.

- Section 4.3 was changed to address, “drive-thru, walk-up, and curbside delivery.”



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Comment 10: 4.4.1.c- Tobacco Licensing. Can we discuss how to obtain a tobacco license for products like Swisher Sweets or blended THC items? Changes Made.

- The Department will be silent on the standard and remove reference to tobacco from section 4.4.1.c.

Comment 10: 4.6.1- ID Requirements. Can military IDs be accepted if no photocopies are made? No Change Needed.

- No, per Tribal-State Compact, Attachment A, 9810.2501, subp. 2(c), and Minnesota Statutes 342.27 Subd. 4(b), military identification cards are not acceptable for age verification.

Comment 11: 4.8.1.a- Receipts. If we retain receipts digitally, is a physical copy still required? Change Made.

- Agreed, digital or paper receipts are acceptable. The Department will be silent on the standard and remove this section 4.8.1.a.

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 "Kenta Hg", is written over a horizontal line.

Department of Cannabis Regulation Board

October 27, 2025

Date