



Mille Lacs Band of Ojibwe
Department of Cannabis Regulation
Cannabis Regulations

SECURITY

Document No. CR – 6

Effective: *Date*

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1. PURPOSE

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.

2. SECURITY MEASURES

2.1. Security Plan Required

- 2.1.1. A cannabis business must maintain and follow a security plan for compliance with these Regulations.
- 2.1.2. The security plan must be maintained at principal place of business of a cannabis business.
- 2.1.3. A cannabis business must review, and update as needed, its security plan at least once every 12 months. A cannabis business must provide notice to the Department of any material changes to the security plan within 30 days of making the change.

2.2. General Security Requirements

- 2.2.1. A cannabis business must develop, document, implement, and maintain security measures to protect:
 - a. business assets;
 - b. facilities;
 - c. regulated products;
 - d. workers;
 - e. visitors; and
 - f. the community.
- 2.2.2. A cannabis business must designate the areas of its facility that are restricted access areas under Code § 1212(c)(1), and implement and enforce the marking, entry log, and visitor restrictions of the Code, as well as any restrictions required by these regulations or the cannabis business’s security plan.



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2.3. Required Security Measures

2.3.1. Security measures under this part must include:

- a. an alarm system, with professional 24-hour monitoring;
- b. 24-hour video surveillance of the interior, exterior view of all entry points, and all parking lots;
- c. interior and exterior lighting with wattage sufficient for video surveillance of the covered area;
- d. locks;
- e. minimum staffing levels for secure operation of the business; and,
- f. an immediate response protocol that must be initiated within 30 minutes after a security event occurs.

2.3.2. A cannabis business may implement additional security features that do not violate Band law or applicable local, state, and federal laws.

2.3.3. Cannabis delivery and cannabis transport licensees are exempt from section 2.3.1 (b).

2.4. Motion Sensors.

A cannabis business may install motion sensors on its premises in interior cultivation areas. If such sensors are installed and operational, then the lighting in such areas may be deactivated as needed to protect cultivation light-dark cycles.

2.5. Security Personnel

A cannabis business may employ or contract with security guards. All security personnel must be at least 21 years of age or older. Contracted security, and any security personnel who will be armed, must meet the training requirements in Minnesota Statutes, section 326.3361.

2.6. Testing and Maintaining Security Measures

2.6.1. A cannabis business must establish a protocol for testing and maintaining security measures required by these Regulations. The protocol must include provisions for periodic testing and prompt repair or remediation of any functions that are not working properly.



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- 2.6.2. A cannabis business must maintain records of the business's compliance with the protocols for testing and maintaining security measures. A cannabis business must make the compliance records available for inspection by the Department upon request

3. THEFT AND DIVERSION

- 3.1.1. A cannabis business must develop, document, implement, and maintain effective security measures to guard against:
- a. the theft of cannabis clones, cannabis plants, cannabis seedlings, cannabis flower, cannabis products, artificially derived cannabinoids, hemp plant parts, hemp concentrate, lower-potency hemp edibles, hemp-derived consumer products, or currency; and
 - b. the diversion of cannabis clones, cannabis plants, cannabis seedlings, cannabis flower, cannabis products, artificially derived cannabinoids, hemp plant parts, hemp concentrate, lower-potency hemp edibles, hemp-derived consumer products, or currency.

4. WORKER ACCESS

4.1. Employee Identification Badges

- 4.1.1. All cannabis workers must have an employment identification badge issued by the cannabis business.
- 4.1.2. The badge must display a visual coding system indicating the activities that the worker may perform and which areas of the premises that the worker may access.
- 4.1.3. Employment identification badges must always be visibly displayed on each worker's person when the worker is conducting activities on behalf of the cannabis business.

4.2. Signage for Limited Access Areas

A cannabis business must post signage at all points of access to areas containing cannabis stating, "Do Not Enter - Access Limited to Authorized Employees Only."

5. UNAUTHORIZED ACCESS

- 5.1.1. A cannabis business must develop, document, implement, and maintain security measures to guard against unauthorized access to:



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- a. the premises of the cannabis business;
- b. motor vehicles used in the transport or delivery of cannabis clones, cannabis plants, cannabis seedlings, cannabis flower, cannabis products, artificially derived cannabinoids, hemp plant parts, hemp concentrate, lower-potency hemp edibles, and hemp-derived consumer products;
- c. electronic business and customer records created and maintained by the cannabis business; and
- d. paper records created and maintained by the cannabis business.

6. ALARM REQUIREMENTS

6.1. General Requirements

- 6.1.1. A cannabis business must install, operate, and maintain in good working order a security alarm system on the business's premises.
- 6.1.2. The alarm system must be active 24 hours per day, seven days per week, provided that sensors for public entry points may be on stand-by status during operating hours.
- 6.1.3. The alarm system must be monitored by a contracted security company or a cannabis worker employed by the cannabis business.

6.2. Alarm Functions

- 6.2.1. The alarm system must provide the cannabis business with:
 - a. alerts to authorized personnel and local law enforcement of an unauthorized breach of the cannabis business's premises or an alarm system failure;
 - b. immediate alerts to authorized personnel and local emergency services of fire or similar hazardous conditions detected on the business's premises;
 - c. a back-up alarm system that activates immediately and automatically upon the loss of electricity and alerts authorized personnel of the loss of electricity;
 - d. an audible alarm capable of being heard by an individual within a 100-foot radius from entrances and exits of the premises; and



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- e. the capability to remotely disable the audio alarm by authorized personnel.

6.3. Procedures for Alarm System Outage or Failure

- 6.3.1. A cannabis business must promptly notify local law enforcement and DCR in the event of an alarm system failure that is expected to last longer than eight hours and must implement alternative security measures according to the security plan required under these regulations.
- 6.3.2. If no alternative security measure is in place or an alternative security measure fails, a cannabis business may not continue operations until either the primary or alternative security system is operational.

7. VIDEO SURVEILLANCE REQUIREMENTS

7.1. Video Surveillance Required

- 7.1.1. A cannabis business must maintain video surveillance of all premises associated with the business's license. A cannabis business must ensure that video surveillance is active during the entirety of any temporary cannabis event.
- 7.1.2. Video surveillance must be active 24 hours per day, seven days per week, on the premises of a cannabis business.

7.2. Requirements for Video Surveillance Systems

- 7.2.1. Video surveillance must consist of video cameras that are:
 - a. placed in locations that allow the cameras to clearly record activity occurring within a radius of at least 20 feet from all points of entry and exit;
 - b. affixed to the exterior and interior of the cannabis business's premises to identify individuals entering and exiting the premises, limited-access areas, and restricted-access areas; and
 - c. at temporary cannabis events, mounted in a manner to record activity occurring in the area accessible to the public, including any designated retail areas, and points of entry and exit.
- 7.2.2. Video cameras must monitor each entry and exit point of the perimeter, limited-access areas, and restricted-access areas of a cannabis business's premises.



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Video cameras must be permanently placed around the cannabis business's premises to allow the viewing, in its entirety, of any areas where:

- a. cannabis is cultivated;
- b. cannabis is manufactured;
- c. cannabis is stored;
- d. cannabis is packaged and labeled;
- e. cannabis is prepared for transfer;
- f. cannabis is displayed or sold at a point-of-sale area;
- g. cannabis is collected as samples for mandatory testing and prepared and sealed for transport to a cannabis testing facility; and
- h. cannabis waste is destroyed or made unusable.

7.2.3. Video cameras must have:

- a. video files produced by the video surveillance system that the cannabis business stores in a secure place for a minimum of 90 days;
- b. 24-hour recording at a minimum of 15 frames per second;
- c. a minimum camera resolution of 720p;
- d. date-and-time stamps on all recordings; and
- e. the capability to continue recording for an additional eight hours during a power outage.

7.3. Maintenance of Video Recordings

7.3.1. A cannabis business must ensure that 24-hour recordings from all video cameras are:

- a. available for viewing by DCR upon request;
- b. saved in an industry standard file format that can be played by office staff without the purchase of particular software or equipment;
- c. retained for at least 90 calendar days;
- d. maintained free of alteration or corruption; and



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- e. erased and destroyed before disposal.

8. OUTDOOR CULTIVATION AREAS

8.1. Fencing and Gates

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.

8.2. Fence Requirements

- 8.2.1. 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.
- 8.2.2. The fencing around an outdoor cultivation area on the business's premises must be commercial or security grade (not agricultural or residential grade) and designed to prevent access to the cultivation area by unauthorized persons.

9. TRANSPORTATION SECURITY REQUIREMENTS

9.1. Applicability

This subpart applies to persons and businesses engaged in the transport or delivery of cannabis.

9.2. Requirements for Vehicles and Workers

- 9.2.1. A cannabis business must ensure that each transport and delivery vehicle:
 - a. is equipped with a locked, safe, and secure storage compartment that is part of the motor vehicle or in a locked storage container that has a separate key or combination pad; and
 - b. is equipped with a global positioning system (GPS) device for identifying the geographic location of the vehicle at all times when the vehicle is in operation, regardless of whether the vehicle's engine is running. The GPS device may be permanently or temporarily affixed to the vehicle. GPS data identifying the geographic location of the vehicle must be saved and maintained for at least 30 days. A cannabis business must make GPS data of all cannabis transportation vehicles and cannabis delivery vehicles available for inspection by the Department upon request.
- 9.2.2. A cannabis worker engaged in transportation of cannabis must:



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- a. possess a cannabis business identification card and the worker's own valid nonprobationary driver's license appropriate for the type of delivery vehicle driven at all times while transporting or delivering cannabis and must present the identification card and valid driver's license to the Department or law enforcement officials upon request;
- b. not leave cannabis clones, cannabis plants, cannabis seedlings, cannabis flower, cannabis products, artificially derived cannabinoids, hemp plant parts, hemp concentrate, lower-potency hemp edibles, or hemp-derived consumer products in an unattended vehicle; and
- c. not leave cannabis in a vehicle overnight or outside the operating hours of the cannabis business conducting the transportation or delivery of cannabis; and
- d. ensure items being transported or delivered are not visible from outside the vehicle.

10. SECURITY AUDIT

The Department may audit the security plan of a cannabis business, and the cannabis business' compliance with such plan, once per year, or, upon a finding good cause, at any time.