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Do not raise the standard to 21 mmJ

To whom it may concern,

Sovereign has been cultivating cannabis indoors since 1998, having tried almost every type of light in existence.

It is not in the best interest of this newly regulated industry to force an unattainable and prohibitive standard in such an aggressive timeline. It's not just about price, it's about performance. The LED industry is getting there but they aren't there yet. What I think is most important is that we as cannabis farmers aren't held to a much higher standard than any other industry. Across the board, industries are given up to 25 years to make changes and phase out older technology while the CEC proposals are that we have an extremely short timeline to make a mandatory switch. We would have to throw away good equipment instead of letting it run its course and be replaced when it would become obsolete. We would have to then incur the extremely high price of replacing them with less productive hardware. To even begin considering this mandatory switch, the LED industry has to improve to the point where there's no question that we'd be switching to a superior product. They should also be incentivizing energy efficient transitions (like they do in all other industries) and they need to give a reasonable timeline. 2 years is such an aggressive timeline that it would literally cause many businesses to fail. Without IPO money no-one can afford to just scrap all their lights and replace them with lights that cost 3-5 times the price. Once again, because we are cannabis (like taxes), we are expected to shoulder the overbearing, oppressive and unreasonable expenses of the whims of uneducated regulatory boards and government. We, as an industry, ask that you do not raise the standard beyond 1.7mm/J and that you adequately consult with industry professionals in the future.

Thank you for your consideration on the matter,

Brandy Moulton
CEO at Sovereign