

Cannabis Industry Marketing Violations in Washington State, 2014–2019

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ABSTRACT. Objective: The purpose of this study was to describe marketing violations from the cannabis industry in Washington State. **Method:** The study team obtained records of all Washington State cannabis marketing violations from October 2014 to September 2015, immediately following the legal cannabis market opening, and May 2017 to July 2019. A code book was developed based on the Washington State regulations related to marijuana advertising. Each marketing violation was coded according to ad characteristics including ad size, location, or type; content; business practices; and lack of mandatory health warnings. **Results:** A total of 328 violations were analyzed, from 183 different businesses. Marketing violations occurred most frequently in content posted online or directly in front of cannabis stores. Community

members were as likely to identify violations as officers from the Washington State Liquor and Cannabis Board (WSLCB), the state agency in charge of regulation and enforcement of cannabis businesses. Very few violations were reported from competing members of the cannabis industry. Violations reported by the community were mostly related to content appealing to minors, whereas WSLCB officers were more likely to identify violations related to ad location in public spaces and ad size. **Conclusions:** This study shows the conflict between prevention and profit in the nascent cannabis industry and the importance of community involvement in the regulation of cannabis marketing. (*J. Stud. Alcohol Drugs*, 83, 18–26, 2022)

THE LEGALIZATION OF the nonmedical cannabis industry in U.S. states has been accompanied by increasingly sophisticated marketing of cannabis products through websites, social media, storefront signs, billboards, and print. In Washington State, in the northwest United States, retail stores have been operating since July 2014 and cannabis-related paid advertisement has been pervasive since then (Carlini, 2017). Research has indicated that youth exposure to cannabis advertising is high and is associated with use or intentions to use in the future (D’Amico et al., 2018; Dai, 2017; Hust et al., 2020; Krauss et al., 2017; Whitehill et al., 2020).

Consistent with these initial findings, decades of tobacco (Dube et al., 2013; Henriksen et al., 2010; Kim et al., 2013; Pierce et al., 2018) and alcohol research (Anderson et al., 2009; Fisher et al., 2007; Gentile et al., 2019; Grube, 2004; Jernigan et al., 2017; Noel & Babor, 2017) have found that promoting legal psychoactive substances by means of marketing can increase initiation and use of these substances, particularly among youth and historically marginalized populations.

Mitigating the effects of marketing has been handled differently, depending on country and the legal substance

involved. In the United States, tobacco marketing has been tightly regulated by the U.S. Food and Drug Administration since 2011, and alcohol advertising has been mostly self-regulated by the industry, through the creation of product specific codes (beer, spirits, wine; Jernigan et al., 2017). Although surveillance and enforcement of these rules have been challenging in both cases, the alcohol industry’s self-regulation approach has been particularly concerning (Jernigan et al., 2017; Monteiro et al., 2017).

In a multicountry study on complaints made by the public on alcohol ads that were not compliant with national regulations, Noel et al. (2017) concluded that having a regulatory system managed by the alcohol industry was a serious conflict of interest plagued by procedural flaws that compromised objective adjudication of complaints. The aim of this present study was to describe marketing violations from the nascent cannabis industry in Washington State.

Study background

Since 2012, cannabis production, processing, and sales for adults (21+) have been legal in Washington State. The first retail store opened its doors in July 2014. As of December 2020, there were 504 licensed stores and 1,426 producer/processors in the state (Washington State Liquor and Cannabis Board [WSLCB], 2021). Since 2014, the Washington State cannabis industry has generated an average \$804 million in retail sales per year, ranging from \$180 million in 2015 to \$1.3 trillion in 2020, including an average \$294 million per year in excise taxes to the state (Fiscal Years 2015–2020, Sales and Excise Tax by County; WSLCB,

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2020b). Cannabis industry interests are represented by the Washington State Cannabis Association (WACA), which supports a professional team dedicated to lobbying Washington State legislators, the Governor's office, and regulatory agencies (Washington Cannabusiness Association, 2020b). In 2020, WACA endorsed 38 elected representatives to the state (Washington Cannabusiness Association, 2020a).

Although cannabis marketing and advertisement are allowed in Washington State, they are subject to regulation: store signs are limited in number, size, and location. The cannabis industry is prohibited from distributing free samples, and ads and packaging must include mandatory warnings about minimum age and health risks. In addition, content that appeals to children, targets minors, or conveys medical benefits is not allowed, among many other requirements (WSLCB, 2020a). In 2017, as a result of community pressure to tighten regulations, the content of billboards became limited to the display of store contact information, and pictures of cannabis products were banned. In addition, other eye-catching forms of advertising, such as sign spinners and costumed people in front of the store, were prohibited. Cannabis ads in Washington State are allowed in print and online, including on social media, on billboards, and storefronts, but not on television and radio (WSLCB, 2020a).

Industry compliance with laws and regulations is overseen by the WSLCB, a state agency with an enforcement division able to issue penalties or warnings for violations. Enforcement officers might visit a store for a compliance or premises check, to investigate a complaint, or as part of an undercover operation (WSLCB, 2020d). Identifying cannabis marketing/advertisement violations throughout an entire state and via a multitude of advertising channels is a daunting task for a state agency also responsible for overseeing all other regulatory aspects of the cannabis industry, including licensing, product tracing, and rulemaking.

WSLCB has recognized that advertising violations are consistently the top complaint made by Washington State residents to the agency's Enforcement Division (Garza, 2017), indicating that community members have been playing an important role in identifying and reporting potential cannabis advertising violations to them. Community reporting of ad violations could be an effective mechanism for increasing industry compliance and protecting youth from cannabis marketing exposure (Babor et al., 2017).

This study examines public records of Washington State cannabis industry marketing and advertisement violations issued by WSLCB from 2014 to 2019. Specifically, records were analyzed to ascertain the most frequent types of marketing/advertisement violations, who identified them, and whether types of violations varied in content and nature depending on how they were identified. The larger goal of this study is to foster our understanding of cannabis industry behavior in circumventing rules to promote their businesses, and the role of regulatory agencies, citizens, and community

organizations in curbing such practices to protect public safety and health.

Method

Data

Washington State residents have the right to search for, obtain, and examine public records per the Washington Public Records Act (WSLCB, 2020c). Through this process, the study team obtained records of marijuana marketing violations, according to Washington Administrative Code (WAC) or Revised Code of Washington (RCW).

In communication with WSLCB staff and because of the regulatory agency staff constraints and high volume of other public records demand, the study team agreed to limit our request in two manners: time period and content. Records obtained encompassed the periods between October 2014 and September 2015, immediately following the market opening, and after various years of functioning, between May 2017 and July 2019. The content requested was specifically related to officer narratives from WSLCB electronic Enforcement Notebook regarding advertising violations for cannabis licensees, Administrative Violation Notices, and picture attachments. These limitations allowed the research team to obtain records in installments, within a 12-month period.

Analysis

The research team developed a code book based on WAC 314.55.155 and RCW 69.50.357 and 367, the Washington State rules related to marijuana advertising. Each marketing violation was coded according to ad placement (social media/websites, billboard, print, in store, storefront, label/packaging, or other), business license class (retail, producer, processor), type of violation (warning or penalty), and who first identified the violation, if indicated (e.g., WSLCB Compliance Officer, community member, cannabis industry). Coders then read the full description to identify the number of violations per record, and classified each violation into four broad categories, as follows: (a) ad size, location, or type (e.g., too many or too large, sandwich board signs, human sign spinners, or inflatables on the sidewalk); (b) content (e.g., appealing to youth, false or misleading claims, promotes overconsumption); (c) business practices (e.g., use of promotions such as raffles, free giveaways, or distribution of branded products, such as t-shirts); and (d) lack of mandatory health and/or age warnings.

Initially, two coders (CF, SG) simultaneously coded a subsample of violations, with the project lead (BC) acting as a tie breaker when there were discrepancies, until consistency in ratings was achieved. A third coder was trained later (IP) using the same subsample and method. In a sec-

TABLE 1. Characteristics of reported marketing violations committed by the Washington cannabis industry, 2014–2019 ($N = 328$)

Variable	<i>n</i>	%
Placement		
Outside store	89	27
Website, social media	55	17
Print	22	7
Billboard	16	5
In store	17	5
Label/packaging	12	4
Email, SMS, radio ^a	10	3
Not specified	107	33
Category		
Size, location, type	112	34
Content	108	33
Lack of warnings	61	19
Business practices	47	14
Who identified/reported		
Regulatory agency (WSLCB)	101	31
Community	95	29
Business (cannabis or otherwise)	8	2
Not documented	124	38

Notes: SMS = short message service; WSLCB = Washington State Liquor and Cannabis Board. ^aRadio, email/SMS, and television cannabis ads are illegal in Washington State.

ond step, the project lead and author IP selected six violations that illustrated the main categories of illegal industry practices. Efforts were made to select violations from the early (2014/2015) and later periods of legal operations (2017/2019) as the industry, regulatory agency, and community evolved in a new landscape of legalized cannabis.

Results

A total of 267 public records were obtained, from 183 different businesses. The vast majority of records involved cannabis retailers (87%), with 10% issued to producer/processors, and 3% not specified. Most violations (63%) resulted in an Administrative Violation Notice without penalty, equivalent to a written warning. One in five received a verbal warning or had the complaint dismissed, and 17% were issued an Administrative Violation Notice with a penalty (monetary fine, temporary license suspension, or both). Officers look at the past 2 years of a business's violation history when determining a recommended penalty (WSLCB, 2020e).

Of the 267 public records, 56 contained more than one marketing violation, resulting in a total of 331 violations. Three violations were excluded for containing only date and place of occurrence; a total of 328 violations were analyzed.

Table 1 describes the main characteristics of these violations. Ads placed outside the store and on websites/social media were most frequently reported, compared with print ads, billboards, in-store ads, and labels and/or packaging. Banned forms of advertising, such as radio or email, comprised 4% of violations. Nearly one quarter of violations analyzed did not have information on ad placement.

As can be seen in Table 1, most reports did not contain information on who first identified the marketing violations. On records where a source was indicated, community members and WSLCB officers reported violations in similar proportions. Members of the cannabis industry reported a total of eight violations from their business's competitors.

As can be seen in Figure 1, community members were more likely to identify violations related to ad content and business practices. In contrast, WSLCB officers were more likely to notice violations of ad size, location, or type. Both WSLCB and citizens noticed roughly the same number of missing health warnings.

Specific violations per category

Size, location, type. The majority of these violations were sandwich boards on public sidewalks, ($n = 39$), followed by size or number of signs facing outside the stores ($n = 34$). Few were because of sign spinners, inflatables, or persons in costumes near the stores (Figure 2). These practices became illegal only in 2017 and prompted five violations, four of them identified by community members who then contacted WSLCB, the regulatory agency.

Content. About a quarter of violations in this category depicted a child or other person under legal age, or had content that appeals to kids (Figure 3). Also common were billboards or outdoor signage with promotions (e.g., "\$100 ounces" or "Happy Holidayze") or with pictures of marijuana products, previously allowed in outdoor advertising and made illegal in July 2017. About a third of these violations were not recorded in enough detail to allow for coding of the specific type of content.

Required warning. Per WAC 314-55-155, outdoor advertising must contain a warning informing that marijuana is only legal for adults 21 years of age and older. All other advertising must contain this very same warning in addition to the following warnings, in a type size at least 10% of the largest type used in the advertisement: "This product has intoxicating effects and may be habit forming; marijuana can impair concentration, coordination, and judgment. Do not operate a vehicle or machinery under the influence of this drug; there may be health risks associated with consumption of this product. Keep out of the reach of children." Violations in this category totaled 61.

Business practices. The most common violations in this category were unauthorized "giveaways," including offering coffee and doughnuts in store, raffles to win movie tickets or party admission, or free food or t-shirts from a neighboring business with proof of purchase. Figure 4 shows two documented violations of businesses practices, including highly discounted cannabis at the beginning of legalization, followed by a more recent event of text blasts offering free hot dogs and discounts on cannabis products.

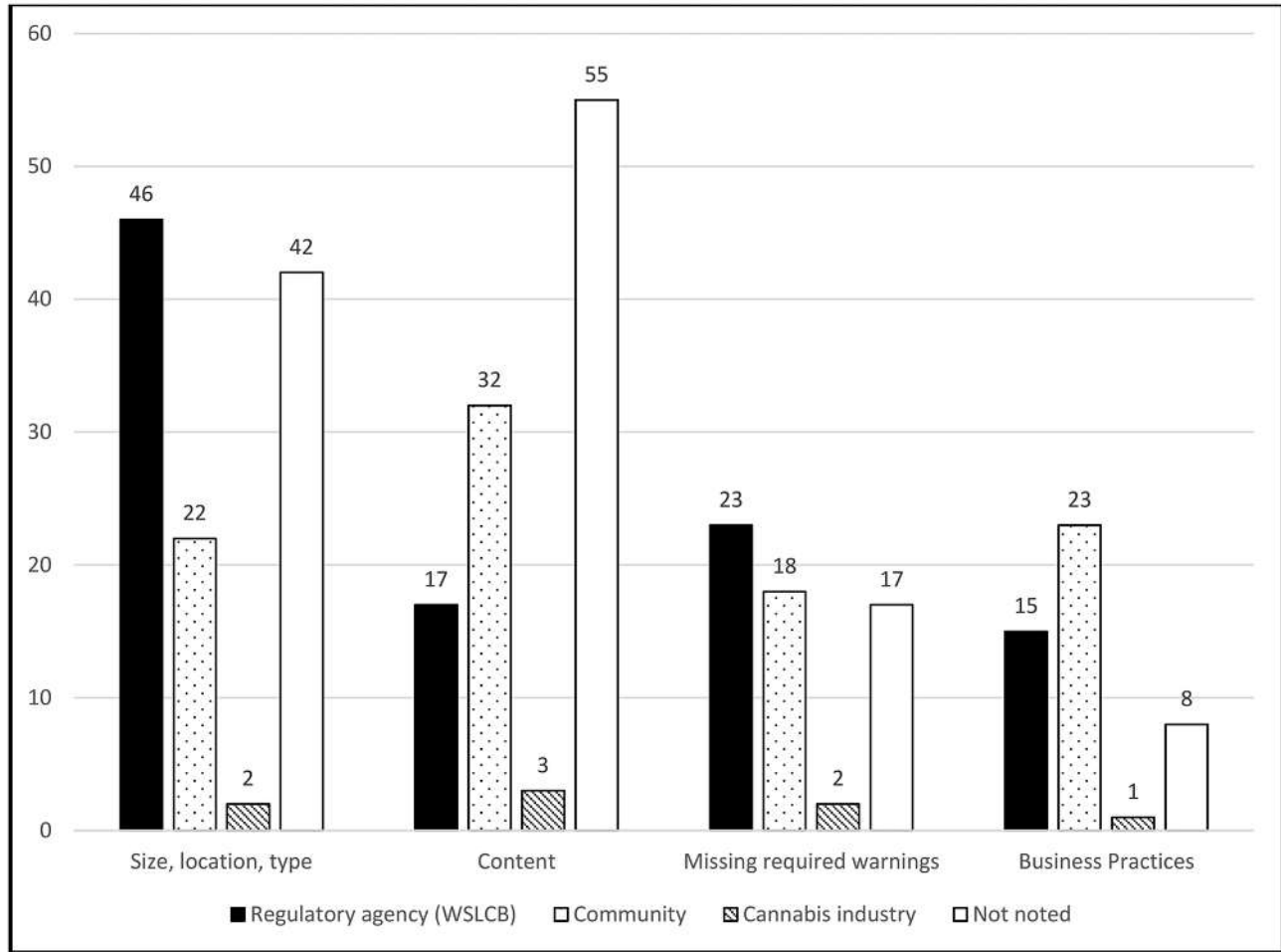


FIGURE 1. Cannabis industry reported marketing violations by type and according to source of violation identification ($N = 328$). WSLCB = Washington State Liquor and Cannabis Board.

Discussion

This study describes marketing violations of the nascent cannabis industry in Washington State. Its findings indicate that reported cannabis marketing violations were most frequent in public spaces, such as on sidewalks and billboards and on social media. Community members mainly identified violations related to ad content and business practices that potentially appeal to underage individuals. In contrast, WSLCB officers were more likely to notice violations of ad size, location, or type, probably identified during site visits to the businesses performed in their routine work. Both WSLCB and community noticed roughly the same number of missing minimum age and/or health warnings required in cannabis products.

The study illustrates the push and pull of prevention versus profit, where the industry attempts to push the marketing regulation boundaries while community members have consistently helped WSLCB identify violations, upholding accountability especially when violations involve content

that appeals to minors. Although organized watchdog organizations that monitor cannabis industries have not emerged yet, these findings document interest and initiative from the Washington State community in reporting cannabis industry marketing violations. Policies incentivizing public complaints and encouraging the growth of civil engagement on cannabis marketing surveillance through watchdog organizations inspired by alcohol and tobacco experience can protect youth from industry targeting (see Alcohol Justice: The Industry Watchdog, 2020; Babor et al., 2017; Campaign for Tobacco-Free Kids, 2021; Stopping Tobacco Organizations and Products [STOP], 2020).

The legal cannabis industry has rapidly evolved from a cottage industry into a well-organized, professional business that generates hundreds of millions of dollars in state taxes (WSLCB, 2020b) and is represented by a professional team of lobbyists working to influence legislators, the Governor’s office, and regulatory agencies (Washington Cannabis Association, 2020b). These industry representatives have pushed for a soft approach toward their noncompliant behav-



FIGURE 2. Use of public spaces to promote cannabis retail stores. 2017: An 18-year-old poses and smiles for a photo taken by a Washington State Liquor and Cannabis Board officer, documenting the use of sidewalk to advertise a cannabis retail store. Reportedly, this individual was directing customers to a specific store while allegedly “swearing at competing customers” from another store nearby. Posing and smiling suggest lack of awareness that public spaces cannot be used to promote cannabis stores and that adults under 21 years of age cannot legally work in the cannabis industry. Four months later, sign spinners became illegal in Washington State.

iors, under the reasoning that “The risk taking entrepreneurs who are trying to comply with board regulations should not face punitive consequences for mistakes made during this initial phase of the industry that did not pose a direct threat to public health and safety” (Clepepe, 2019). Possibly in response to these arguments—and without a strong opposing public health voice to counter the industry—WSLCB has avoided issuing penalties to marijuana businesses (only 17% of cases analyzed resulted in a penalty) even for violations that it could be argued were threats to public health.

Compared with how quickly the cannabis industry became organized, public health and prevention organization around cannabis is still fragmented. Full-time lobbyists from cannabis industries are present in every cannabis-related regulatory and policy event, whereas community public health activists lack the resources to allow the same level of

participation. Leveraging dollars from cannabis-generated taxes to boost nongovernmental organization engagement around cannabis marketing regulation and surveillance is urgently required. This may involve regular and systematic partnership between WSLCB surveillance staff and community agencies, including youth-led coalitions, and an incentive program for identifying violations, particularly on social media.

Other policy initiatives may include more robust penalties and enhancement of a public reporting system of industry marketing violations to allow easy data access that can inform public action (as described in the Method section, it took about 1 year for this manuscript’s authors to obtain the data reported in this article).

There are many limitations in this study, related to the type of data available for analysis. Maybe the most signifi-



FIGURE 3. Social media postings with content appealing to children. 2015: Reported to Washington State Liquor and Cannabis Board (WSLCB) by community, this cannabis retailer used social media (YouTube video) with cartoon characters (such as Minions and Scooby Doo) to advertise its products. Similar violations were later identified by WSLCB on the retailer’s Facebook page, including “children dressed as Cheech and Chong,” a smiling Sponge Bob with the saying, “Feeling you get when you have weed,” and a cartoon character from the television cartoon Family Guy reading, “I lost all my weed.” 2018: Identified by a WSLCB officer, this Instagram post from a cannabis retailer contained various cartoon characters (such as Alice in Wonderland) smoking marijuana.

cant is that no temporal analysis was possible given the ever-changing number of retail stores and producers, as well as enforcement agents. It is also important to note that formal complaints against any industry represent only a fraction of the actual violations. Many records lacked detailed informa-

tion, as they were produced with the intent to record data for enforcement and not for research.

Although these limitations are significant, this study unveils a new aspect of cannabis industry behavior. Cannabis advertisement exposure (D’Amico et al., 2018; Dai, 2017;



2015



Free Smoked Hot Dogs and 25%
off all DOGHOUSE Supreme
products!! Only until 6pm today!
Text STOP to end

2019

FIGURE 4. Cannabis industry marketing violations—illegal business practices. 2015: A Facebook post featuring a young individual wearing a T-shirt with the slogan “Maturity is overrated” promoted a raffle for a highly discounted cannabis product (“Winner-winner \$2 ounce dinner!”). The invoice price of product was \$112 an ounce. This violation was identified by a Washington State Liquor and Cannabis Board officer. 2019: Text sent to customers by a retail store offering discounted cannabis and free food (hot dog stand in front of store pictured).

Krauss et al., 2017) and content (Carlini et al., 2020; Luc et al., 2020) have been the focus of various studies in the last few years. Yet only one study has looked at marijuana industry social media compliance with Washington State advertising regulations (Moreno et al., 2018), and no research has been conducted to date on the role of regulatory agencies, community members, and the cannabis industry in identifying cannabis industry marketing violations and successfully removing ads that violate state regulations. Future studies, in other states and countries, are warranted to inform policies in this area.

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