

SUBMITTED TESTIMONY TO THE GENERAL LAW COMMITTEE 22 FEB 2024

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As a member of the Connecticut Canna Food and Beverage Alliance Corporation, a trade group representing the cannabis Food and Beverage licensees, I would like to thank the Committee and its leadership for the opportunity to present this testimony. We appreciate the ability to have input in a public forum.

Our Alliance supports:

Allowing Product Packagers to expand their activities to those of a Product Manufacturer.

Seven of the eight Product Packagers are Social Equity Applicants, and we believe this change will create viable opportunities for these licensees. We also believe the legislature should consider collapsing the three manufacturing-related licenses into the Product Manufacture license which may streamline the administration by the Department of Consumer Protection. In the end, licensees will flex in the direction of their competencies.

Allow Transporters to warehouse products in approved storage facilities.

This will facilitate the operations of all other license types and will create additional viability for Transporters.

Give Food and Beverage Manufacturers and Product Manufacturers the ability to pick up cannabis from other licensees, similar to what was provided to Product Packagers in PA 23-79.

This will allow us to pick up time-sensitive materials – particularly fresh biomass – from growers. We believe we have the support of Transporters on this issue.

Add an additional one year to extension for licenses to reach final approval.

The difficulties we are facing with land use issues and the delays in available cultivation outputs will require more time.

The proposed definition of Synthetic Cannabinoids.

We believe they have no place here.

We have concerns with:

The definition of Manufactured Cannabinoids.

We want to ensure manufacturing processes which are Generally Regarded as Safe but may not fall within the Department's definition are not inadvertently excluded.

Further advertising restrictions.

We believe we can work with the department to arrive at sensible approaches to reaching patients and consumers and we hope to avoid any additional statutory restrictions at this point in time.

Regarding Manufacturers and our position on grow licensing:

We support a cultivation framework that favors small over big. We believe there is a place for grow-only licenses rather than vertically integrated licenses in order to prevent a lopsided marketplace. We support our Social Equity based DIA Cultivators and anything that helps them succeed. We support our hemp farmers and wish for viable opportunities for them. We believe that Outdoor canopy does not equal Indoor canopy – it's a different product, with a different value, business model, and regulations.

Growers are the key to the entire ecosystem. We are very concerned for our licenses due to the lack of available biomass or extracted oil from growers. We believe this is an existential threat. The delay in flower production will cause significant delays in getting derivative products to market. For this reason, we support the following:

- A pathway for DIA Cultivators to partner with Hemp Producers
- A pathway for DIA Cultivators to become Micro-cultivators
- An expansion of the DIA definition to allow growing within towns with DIAs
- A December 31, 2024 deadline for DIA Cultivators to pay their Provisional licensing fee
- An expansion of the DIA definition to include certain Tribal Lands

Thank you for the opportunity to present our views.