

Testimony in Support of Modernizing Connecticut's Hemp Beverage Framework

Representing the CT Licensed Infused Beverage Manufacturers

Good afternoon Sen. Maroney, Rep. Lemar, Sen. Cicarella, Rep. Rutigliano, and honorable members of the General Law Committee:

This is the third legislative session we've come before you on hemp beverage policy, and we want to thank you for your continued attention to this evolving category. In the interest of time we have elected to combine our testimony here as a united front representing all 6 CT-based Infused Beverage Manufacturers:

1. Float House - Windsor, CT
2. Thomas Hooker Brewing Co. - Bloomfield, CT
3. Two Roads Brewing - Stratford, CT
4. CT Valley Brewing Co. - South Windsor, CT
5. Black Hog Brewing Co. - Oxford, CT
6. Sono 1420 - Norwalk, CT

Connecticut has chosen regulation over prohibition in the hemp beverage space, and we appreciate the thoughtful work reflected in HB 5350. The proposed increase to five milligrams in liquor stores and ten milligrams in dispensaries reflects how the category has matured while maintaining a conservative structure.

We are here to request targeted technical adjustments to ensure the framework functions at commercial scale while preserving public safety.

Supply Chain Clarity

The bill creates a commercial extractor structure but does not clearly state whether infused beverage manufacturers may source compliant hemp-derived intermediate materials from out-of-state suppliers. At present, there are only two extractors operating in Connecticut, and neither is operating at beverage-scale. It is also unclear whether existing operators would qualify or scale under the proposed commercial

extractor license. Without explicit interstate sourcing authority creating a supply vacuum rather than a regulated market.

We respectfully request language clarifying that infused beverage manufacturers may source compliant hemp-derived intermediates from entities authorized under Connecticut law, the laws of another state, or federal law provided the finished beverage complies with all Connecticut potency and testing requirements. This is not an expansion of consumer potency. It is supply chain continuity.

Testing Standards & Implementation Timing.

We support the allowance for accredited out-of-state laboratories. Expanding lab access reduces bottlenecks and improves compliance timelines. We respectfully request that this flexibility be operational immediately upon passage. We also request defined testing variance parity. Cannabis edibles are granted a one-milligram laboratory margin of error in HB 5350. Infused beverages are not explicitly granted that same allowance. Without parity, normal laboratory variability could render compliant batches unsellable. A defined one-milligram variance reflects measurement reality; it does not increase potency.

Dosage Caps and Timing

We applaud the increase to five and ten milligrams. In a recent survey of 123 adult Connecticut consumers, nearly 79 % indicated the current 3 mg limit is too low and nearly 90 % said they would purchase a 5 mg product. The original three-milligram cap was a prudent “walk-before-you-run” approach when the category was new, but after nearly two years of regulated sales without documented issues related to these products, the data suggest modest increases align with consumer expectations and policy in other states. We respectfully request that the new dosage caps take effect upon passage or by July 1; beverage demand peaks in the summer, and waiting until October delays the economic benefit of this legislation by a full year.

On-Premise & Taproom Rights for Inf-Bev Manufacturers

We applaud the inclusion of regulated on-premise consumption in this bill. We believe that this can be done safely with service education and have provided details on the way RI is choosing to tackle that aspect in the appendix. Education about responsible use of our products is integral to our category and something we are uniquely qualified

to do. We respectfully request that the base manufacturer license allow on-premise consumption, to-go packaged sales and participation in special events. This would create parity with the channels outlined in the bill and allow us to provide the direct consumer education needed for this young category as well as support tourism, and keep sales within supervised, licensed environments. To-go authority is critical; without it, a taproom model is economically incomplete. Notably, nearly half of survey respondents said they prefer beverages over other cannabis products because the effects feel controlled and predictable. Bringing consumption into licensed venues reinforces responsible service and public safety.

Direct-to-Consumer Sales

Out-of-state companies are already shipping hemp products into Connecticut online, often without complying with our standards. Approximately one in five survey respondents reported purchasing hemp beverages online from out-of-state sellers. Allowing limited, regulated direct-to-consumer sales by Connecticut licensees would keep transactions inside the licensed system, enforce age verification, ensure testing compliance and capture tax revenue.

\$1/Can Tax (Future Consideration)

While tax policy may not be addressed in this bill, the current per-can tax structure has material economic impact on in-state operators. We welcome continued discussion with our regulators and legislators on this key issue.

Closing

Connecticut has already chosen regulation. The adjustments we propose preserve public safety while ensuring supply stability, enforceable testing standards, and economic viability. We support continued oversight and collaboration. We ask that the statutory framework reflect how licensed manufacturers and retailers actually operate in practice. Thank you for your time and consideration.

s/ Gordon Whelpley

Representing the CT Infused Beverage Manufacturers &

Founder & CEO

Appendix A – Connecticut THC Beverage Consumer Survey Summary (Directional)

Sample size: 123 Connecticut respondents (adult consumers). This voluntary online survey is not statistically representative but provides directional insight.

- **Consumer profile:** The majority (57.7 %) were ages 35–44; 18.7 % ages 25–34. Gender split: 57.7 % male, 39 % female. Respondents largely represent the core demographic that purchases regulated hemp beverages.
- **Usage frequency:** 35.8 % consume weekly; 40.7 % consume 1–3 times per month; 17.9 % have consumed a few times. Over 75 % are recurring users, indicating an established consumer base.
- **Dosage perception:** 78.9 % believe the current 3 mg cap is too low; 17.1 % feel it is appropriate. 71.5 % would definitely purchase a 5 mg product and 17.9 % would possibly purchase it, suggesting nearly 90 % positive purchase intent at 5 mg.
- **Product experience:** 46.3 % report that hemp beverages are preferable to other cannabis products because effects are controlled and predictable, 24.4 % say effects are about the same, and 21.1 % say worse because multiple beverages are needed. The primary drawback is under-dosing, not safety concerns.
- **Pricing impact:** 39 % buy less frequently due to price, 17.1 % regularly choose not to buy, and 15.4 % purchase out-of-state due to price. If prices decreased, 45.5 % would buy more often and 38.2 % would start buying regularly.
- **Out-of-state purchasing behavior:** 78.9 % buy from Connecticut retailers, 25.2 % buy when traveling, and 19.5 % purchase online from out-of-state sellers. Direct-to-consumer and interstate purchases already occur outside Connecticut's regulatory framework.

Key points:

- Nearly 79 % of respondents view the current 3 mg cap as too low, and nearly 90 % express positive purchase intent at 5 mg.
 - Almost half prefer beverages due to controlled and predictable effects, underscoring the public-safety value of regulated hemp beverages.
 - About **20 % *already purchase online from out-of-state sellers***, highlighting the need for a regulated direct-to-consumer channel.
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Suggested Statutory Language

Interstate Sourcing Clarification

(Amend Section 88 – Commercial Extractor; and Infused Beverage Manufacturing Section)

Current Issue: Section 88 creates a “commercial extractor” license and prohibits manufacturing or selling commercial extract in this state unless licensed. It is unclear whether this language restricts infused beverage manufacturers from sourcing compliant hemp-derived intermediates from out-of-state suppliers.

Proposed Amendment:

Add a new subsection under the Infused Beverage Manufacturer section (or as a clarifying clause in Section 88):

New Subsection (e): Interstate Sourcing Clarification

Notwithstanding any provision of Section 88, an infused beverage manufacturer may obtain hemp oil or intermediate hemp-derived cannabinoid products from any person authorized under the laws of this state, another state, or federal law to manufacture and sell such products, provided such products are incorporated exclusively into

infused beverages and the finished product complies with all applicable total THC concentration and testing requirements.

Work-In-Process (WIP) Clarification

(Amend Infused Beverage Manufacturing Section – Hemp Oil Definition / Manufacturing Standards)

Current Issue: Some interpretations prohibit receipt of intermediate hemp materials temporarily exceeding 0.3% THC during manufacturing.

Proposed Amendment:

Insert into the manufacturing standards subsection:

Licensed infused beverage manufacturers may receive and process intermediate hemp-derived cannabinoid materials within licensed premises, even if such materials temporarily exceed 0.3% total THC on a dry weight basis, provided that the finished infused beverage complies with all applicable total THC concentration limits and testing requirements prior to sale.

Testing Variance Parity

(Amend Infused Beverage THC Limit Section – where 5 mg / 10 mg caps are stated)

Current Language:

“Not to exceed five milligrams per container...” (or similar hard cap phrasing)

Proposed Amendment:

Modify the potency compliance clause to read:

For purposes of compliance with per-container THC limits for infused beverages, total THC shall not exceed the greater of (i) the applicable milligram limit per container, or (ii) such limit plus one milligram, provided the increase is attributable to laboratory margin of error inherent in analytical testing.

Effective Date Adjustment

(Amend Effective Date Section at End of Bill)

Current Language:

"All sections effective October 1, 2026."

Proposed Amendment:

Modify to read:

Sections relating to hemp oil sourcing, per-container THC limits and infused beverage laboratory testing standards shall take effect upon passage. All other provisions shall take effect October 1, 2026.

Taproom / On-Premise + To-Go Authority

(Amend Infused Beverage Manufacturer License Section)

Current Issue:

Manufacturer license does not explicitly allow on-premise sales or to-go packaged sales without separate endorsement.

Proposed Amendment:

Insert into manufacturer privileges subsection:

An infused beverage manufacturer may sell infused beverages manufactured by such licensee for on-premise consumption at the licensed premises and for off-premise, to-go packaged sales without requiring a separate on-premise endorsement, provided all age verification and retail compliance requirements are met.

Removal of Four-Pack Limitation

(Amend Packaging Restrictions Section)

Current Language:

“Packaging shall not exceed four containers per package.”

Proposed Amendment:

Strike language limiting packaging comprised of more than four containers.

Rhode Island’s THC-Infused Beverage Training Program

Rhode Island’s Hospitality Association (RIHA) recently launched a web-based THC-infused beverage service program, designed because there is no national equivalent (such as ServSafe) for cannabis drinks. Key points include:

- Scope and purpose: The program teaches safe service of hemp-based, THC-infused beverages. It covers dosage and serving sizes, onset times, age verification, responsible service protocols, and recognizing over-consumption .
- Certification: Participants complete an online course and exam to earn a three-year certification in THC-infused beverage service and sales .
- Cost and accessibility: The training costs \$45 and is available to anyone, including restaurant workers, liquor store employees, or consumers seeking responsible consumption education .

Development: RIHA built the program because existing ServSafe curricula (used for food and alcohol safety) lacked cannabis-specific training. They partnered with an online provider to tailor the course for THC beverages .

- Broader interest: Since launching, RIHA has received inquiries from hospitality groups in several states seeking to adapt the program to their own cannabis regulations .

These details illustrate how Rhode Island is proactively addressing responsible service of hemp-derived beverages—an example Connecticut might emulate when considering training requirements for its own infused-beverage regulations.