

From: [Kevin Mehra](#)
To: [Inquiry, CCC](#)
Subject: Rhode Island
Date: Thursday, September 25, 2025 10:39:36 AM

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Good Afternoon,

Public Comment from Latitude Beverage:

As the owner of a Rhode Island manufacturing business in the Alcohol Beverage space we decided to get into the Hemp Beverage business when we saw the growth of the category in our retail customers and it started taking shelf space away from our products. Currently, beverage alcohol is in a recession with declining volume and revenue the past 2 years, Hemp beverage is a lifeline of growth for us, our retail partners and employees within our industry.

Rhode Island has been ahead of many neighboring states to lead this new industry and provide thoughtful, business friendly and common sense regulation to this new growing industry. I am hoping the CCC and RI legislature would consider two tweaks to the current regulations that will help to grow manufacturing of Hemp beverages in RI and create more jobs (reports indicate Hemp beverage in America support 325,000 jobs already).

1. Safe harbor for manufacturing products for export only that are not compliant in RI - We are a manufacturer of beverage alcohol in RI and have spent over \$1M on CAPEX in the past year modernizing and growing our facility. Unfortunately when we decided to enter this new business we discovered that unlike CT, ME, NY, CO and most other states RI does not provide safe harbor for manufacturers to produce products that are not compliant in RI to export to other markets. Since NJ, NC, MN, IL and many other states best selling THC level is 10mg and that level is not legal in RI we were forced to co-pack and give this business and jobs to a CT brewery instead of a RI company. Even states like CA and CO that have prohibited the sale of Hemp Beverages have provided safe harbor to produce the product for export.

2. Cannabis cards for producers - Current regulations require all employees of companies that produce hemp beverages hold a Cannabis registration card. I do think the registration card is great, I am registered as the owner and had a criminal background check and was fingerprinted. The problem is I have over 80 employees nationally and I could not get all of my employees that do merchandising, finance, marketing and sales in states like GA or TX to get Cannabis cards. This requirement would also be prohibitive for larger companies to bring manufacturing into Rhode Island.

Thank you advance for your consideration, we at Latitude Beverage are proud to be producing our products in Rhode Island that ship to over 32 states around the country and employ 30 people and look forward to growing further in the state!

Cheers,

Kevin Mehra.

- 560-RICR-10-20-1, [Rhode Island Industrial Hemp Program - Rhode Island Department of State \[kfezndgbb.cc.rs6.net\]](#)

Kevin Mehra
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Adam Oliveri, CEO
Craft Collective Homegrown
815 Jefferson Blvd
Warwick, RI 02886

October 6, 2025

Kim Ahern, Chair
Cannabis Control Commission
560 Jefferson Boulevard, Suite 200
Warwick, RI 02886

Dear Chair Ahern and Members of the Commission:

On behalf of Craft Collective Homegrown, I submit the following comments regarding the proposed regulations governing Rhode Island's Industrial Hemp Program. Craft Collective Homegrown is a first-generation, family-owned distributor and wholesaler of adult beverages serving Massachusetts and Rhode Island. Our portfolio includes beer, cider, spirits, non-alcoholic drinks, and hemp-derived beverages. In both Massachusetts and Rhode Island we have built one of the leading independent craft distribution networks, with substantial experience in alcohol compliance, logistics, and retail partnerships. In Rhode Island, we apply that expertise to hemp beverages, working closely with manufacturers, distributors, and retailers to ensure responsible marketing, distribution, and sales.

We are also an active participant in the Commonwealth Beverage Coalition, a multi-state alliance of alcohol and hemp stakeholders. Our aim is to help foster a similar coalition in Rhode Island so that hemp beverages are regulated with the same discipline, cooperation, and shared responsibility that already governs other adult-beverage categories.

Continuity of the Current Framework

The proposed rule appropriately maintains continuity with the framework previously administered by the Department of Business Regulation. Rhode Island's system has proven effective: the one milligram per serving and five milligram per package potency cap, the child-resistant packaging requirement, and sales through age-gated retail outlets have together created a safe, stable market. There have been no recalls, no significant enforcement actions, and no evidence of heightened youth access. This record of stability should be preserved and carried into the Commission's study.

Immediate Clarification: Resealability

We respectfully request one clarification to the proposed regulation. Section 1.11.4 requires

child-resistant packaging consistent with federal standards. Those federal standards do not mandate resealability. The introduction of a resealability requirement in prior guidance went beyond the statutory and regulatory text. For low-dose products capped at five milligrams per package, resealability increases cost and complexity without advancing consumer safety. Most such products are consumed in a single sitting and already meet child-resistance and labeling requirements. We therefore urge the Commission to confirm in the final rule that resealability is not required, so long as packaging otherwise complies with § 1.11.4. This clarification is consistent with federal standards, removes unnecessary burdens, and provides clarity for both operators and regulators.

Future Considerations for the Study

Beyond this clarification, we encourage the Commission to use its study mandate to examine the broader structure of the market. Neighboring states are adopting varying approaches: Massachusetts is preparing to permit five milligram beverages in liquor stores, Connecticut has implemented excise taxes, and Maine has strengthened labeling and placement rules. Rhode Island should prepare for regional alignment while maintaining its emphasis on safety and stability.

In our view, a harmonized adult-beverage framework would allow alcohol retailers to continue offering low-dose, sessionable hemp beverages, while marijuana licensees could provide higher-dose, multi-serving products for cannabis consumers under equivalent safeguards. This dual-channel model respects the distinct roles of each system, expands consumer choice, and connects new consumers to Rhode Island's emerging cannabis economy. We are not asking the Commission to adopt such changes today, but we believe they warrant serious consideration within the study process.

Craft Collective Homegrown stands ready to contribute data, operational experience, and retailer perspectives to the study record. We are committed to working with Rhode Island stakeholders to develop a coalition that speaks with one voice, supports consumer safety, and positions Rhode Island's hemp beverage market for durable growth.

Thank you for your careful consideration of these comments and for your leadership during this transition.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Adam Oliveri', with a stylized, cursive script.

Adam Oliveri

Re: Proposed Rule 560-RICR-10-20-1 Rhode Island Industrial Hemp Program

Date: **10/15/2025**

Dear Chair Ahern and Members of the Rhode Island Cannabis Control Commission,

Thank you for the opportunity to submit comments on the proposed rules for Rhode Island's Industrial Hemp Program. As a **[licensed hemp business / CBD retailer / distributor]** I want to express both support for consumer protections and concern that several of the proposed rules, as written, will negatively impact farmers, small businesses, and consumers in our state.

The current draft creates confusion and unnecessary costs in areas that could be addressed with science-based, farmer-friendly rules. Specifically:

- Post-harvest testing is not required under federal law and risks putting outdoor farms out of compliance. Previously, 1% Total THC was allowed under state regulations.
- THC limits (1 mg per serving, 5 mg per package) are stricter than states in the region and far below Rhode Island's prior allowance of 100 mg per tincture, which patients rely on. New limits also need to be set for the "inhalable concentrates" product type.
- Hemp pre-rolls and vape products should not be classified as tobacco, since they are cannabis products, not cigarettes. THC pre-rolls and vape cartridges are the second- and third-best-selling product categories in Rhode Island, generating roughly \$33 million in year-to-date sales. Yet hemp licensees are prohibited from producing comparable non-intoxicating versions, excluding small farms and manufacturers from a major segment of the state's cannabis economy.
- Hemp-derived beverages need clear rules. A framework based on science, such as a 15:1 CBD:THC ratio, would allow safe, accessible beverages while balancing the interests of liquor distributors, retailers, and dispensaries.

Rhode Island has the chance to build a program that protects consumers while supporting farmers and businesses across the supply chain. To do this, the Commission should align hemp regulations with federal law and regional leaders like New York and Maine, which have adopted evidence-based frameworks that support both safety and economic growth. I respectfully urge the Commission to revise the proposed regulations to remove unnecessary barriers, adopt clear product standards, and ensure fairness for all stakeholders. With these adjustments, the program will better serve Rhode Island's farmers, retailers, distributors, and consumers.

Although the period for requesting a mandatory hearing has passed, we urge the Commission to voluntarily hold an oral hearing due to the significance and statewide impact of these proposed regulations. This would allow farmers, retailers, distributors, and consumers to share experience and help the Commission craft rules that are fair, effective, and science-based.

Sincerely,

Douglas A. Cochrane jr
CBD Releaf Center
Hemp retail license #01

Subject: Public Comment – Proposed Rule 560-RICR-10-20-1
From: Rhode Island Reef, Newport RI
Date: October 19, 2025

Dear Chair Ahern and Members of the Rhode Island Cannabis Control Commission,

As the owner of *Rhode Island Reef*, a Newport-based hemp and CBD retailer/distributor, I want to share my deep concern over the proposed rules for Rhode Island's Industrial Hemp Program.

We support clear standards that promote safety and transparency, but several of the proposed limits and classifications appear broader than necessary to achieve those goals. They would eliminate key product categories, contradict federal law, and put small Rhode Island businesses at a severe disadvantage compared to online and out-of-state sellers.

The proposed 1 mg per-serving and 5 mg per-package THC limits are not based on science or consumer safety. Under the federal Farm Bill, hemp products are already required to remain under 0.3% Δ^9 THC by weight — a clear national standard that protects consumers while allowing full-spectrum formulations especially for tinctures. Rhode Island's prior allowance of 100 mg per tincture should not be removed. Rhode Island's new limits would compromise sales of many safe products. Including products that have been safely sold throughout Rhode Island for years.

Instead of over-regulating, Rhode Island should align its hemp program with federal law and neighboring states that rely on testing, certificates of analysis, and age restrictions — not arbitrary potency caps — to protect consumers. I respectfully urge the Commission to:

1. Remove or revise the per-serving and per-package THC limits to match federal standards or a CBD:THC ratio limit that would not eliminate full spectrum products.
2. Preserve full-spectrum CBD tinctures and other long-established hemp products.
3. Allow responsible sale of hemp flower, pre-rolls, vapes, and beverages under clear COA and labeling requirements.
4. Hold a public hearing to ensure that small Rhode Island businesses are part of this process.
5. Rhode Island's hemp industry has proven itself safe, compliant, and community-focused. Please do not regulate us out of existence. A fair, science-based approach will protect consumers *and* sustain local businesses like ours that help define the character of this state.

Sincerely,
Nishan Han

PADWA LAW, LLC

ONE PARK ROW, 5TH FLOOR, PROVIDENCE, RI 02903 (401) 935-8571

Jeffrey M. Padwa

Licensed in RI, MA

October 15, 2025

SENT BY EMAIL ONLY

cccinquiry@ccc.ri.gov

Kim Ahern, Chair
Cannabis Control Commission
560 Jefferson Boulevard, Suite 200
Warwick, RI 02886

**Re: Public Comment
Proposed Regulations: 560-RICR-10-10-1
Rhode Island Industrial Hemp Program**

Dear Chairwoman Ahern and Members of the Commission:

This written testimony respectfully requests that the Commission amend the proposed Industrial Hemp Regulations to permit hemp-derived beverages containing not more than five (5) milligrams of total THC per container to be sold without a resealable closure, consistent with the packaging standards established for single-serve Adult Use cannabis products pursuant to Adult-Use Cannabis Regulation 560-RICR-10-10-2.6(F). This alignment would ensure uniform safety, clarity, and fairness across all THC-containing beverages regulated by the Commission.

Proposed CCC Regulation to § 1.11(I)(1) – Packaging Requirements

A. Current Language

I. Packaging and Labeling Requirements for allowable Hemp-Derived Consumable CBD Products available for sale to a consumer at retail.

1. Packaging Requirements.

a. Any container or packaging containing hemp-derived consumable CBD products must:

- (1) Be opaque and light resistant;
- (2) Fully enclose the product;
- (3) Protect the product from contamination;

- (4) Be Child-Resistant as defined in § 1.5(F) of this Part; and
- (5) Not impart any toxic or deleterious substance to the hemp product.

B. Proposed Amendment to Regulation (with tracked additions):

I. Packaging and Labeling Requirements for allowable Hemp-Derived Consumable CBD Products available for sale to a consumer at retail.

1. Packaging Requirements.

a. Any container or packaging containing hemp-derived consumable CBD products must:

- (1) Be opaque and light resistant;
- (2) Fully enclose the product;
- (3) Protect the product from contamination;
- (4) Be Child-Resistant as defined in § 1.5(F) of this Part; and
- (5) Not impart any toxic or deleterious substance to the hemp product.

b. For hemp-derived beverages containing not more than five (5) milligrams of total THC per container, resealable closure shall not be required, provided that:

- (1) the total THC content per container does not exceed five (5) milligrams;
- (2) the container is clearly labeled as a single-use beverage;
- (3) the label includes “CONTAINS THC – 5 MG TOTAL – SINGLE SERVING” in bold, contrasting font; and
- (4) the product otherwise meets all child-resistant, opaque, and tamper-evident packaging requirements of this section.

c. Hemp-derived beverages exceeding five (5) milligrams of total THC per container shall include a resealable closure and comply with all other packaging provisions of this section.

Comments in Support of the Proposed Amendment

1. Alignment with Adult Use Cannabis Regulations

Adult-use Cannabis Regulation 560-RICR-10-10-2.6(F) allows up to ten (10) mg THC per serving in a non-resealable child-resistant container. The proposed hemp beverage limit (i.e. five (5) mg THC per container) is half that potency. Treating a less-potent hemp beverage more restrictively than a stronger cannabis product creates an unfair inconsistency within the regulatory framework.

Rhode Island’s Adult Use Cannabis Regulation 560-RICR-10-10-2.6(F) establish that a single serving unit shall not exceed ten (10) milligrams of total potential THC, and if sold individually, may be placed in a child-resistant container that may or may not be resealable.

This means that a single-serving Adult Use cannabis beverage (10 mg) can be sold in non-resealable packaging, provided it is child-resistant.

The proposed amendment ensures that hemp-derived beverages containing no more than 5 mg THC per container receive equivalent treatment, preserving consistency and fairness.

2. Public Safety and Consumer Transparency

Proposed Amended Regulation § 1.11(I)(1)(b)(3), which would require clear labeling (e.g. “CONTAINS THC – 5 MG TOTAL – SINGLE SERVING”) would ensure that consumers are fully informed at point of sale and mirror the informational approach used in the Adult Use regulations. The same consumer-protection goals would be achieved without introducing redundant packaging burdens.

For hemp-derived beverages capped at 5 mg total THC per container, the risk of overconsumption would be negligible with clear labeling, child-resistant packaging, and tamper-evident seals providing sufficient protection without requiring resealable mechanisms.

This approach not only protects consumers but also provides a clear, enforceable standard for inspectors and retailers, reducing compliance ambiguity.

3. Economic and Regulatory Consistency

Rhode Island hemp beverage manufacturers are small and emerging businesses. Mandating resealable packaging for low-dose, single-serve beverages would disproportionately increase per-unit costs by requiring custom canning or specialty lids not used in the broader beverage industry, undermining local competitiveness.

Requiring resealable closures for 5 mg hemp beverages would also impose stricter and costlier requirements on hemp producers than cannabis manufacturers. Aligning standards would ensure a level regulatory playing field.

4. Legal and Policy Justification

Under the Rhode Island Cannabis Act, R.I.G.L. § 21-28.11-6, and the Industrial Hemp Growth Act, R.I.G.L. § 2-26-6, the Commission is tasked with promoting a regulated, safe, and economically sustainable cannabinoid marketplace. Aligning hemp and Adult Use cannabis packaging regulations fulfills this mandate by ensuring consistent public safety protections and avoiding consumer confusion.

Allowing 5 mg single-serve hemp beverages in non-resealable packaging would address safety concerns and balance economic considerations under the Industrial Hemp Growth Act, mirroring the Adult Use regulatory.

Conclusion

By adopting the proposed amendments to Industrial Hemp Regulation § 1.11(I)(1)(b) and (c) above, the Commission ensure product safety proportional to potency, and provide clear, consistent and enforceable standards for both hemp and Adult Use cannabis beverages sold in Rhode Island.

The Commission should adopt the proposed amendments to Industrial Hemp Regulation § 1.11(I)(1) and affirm parity with Adult Use regulation 560-RICR-10-10-2.6(F).

Thank you for considering these comments.

Very truly yours,

/s/ Jeffrey Padwa

Jeffrey Padwa, Esq.

From: [Alexander Allen](#)
To: [Inquiry, CCC](#)
Subject: Proposed Rule 560-RICR-10-20-1 Rhode Island Industrial Hemp Program
Date: Monday, October 20, 2025 4:06:44 PM

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Date: **10-19-25**

Dear Chair Ahern and Members of the Rhode Island Cannabis Control Commission,

Thank you for the opportunity to submit comments on the proposed rules for Rhode Island's Industrial Hemp Program. As a CBD retailer, I want to express both support for consumer protections and concern that several of the proposed rules, as written, will negatively impact farmers, small businesses, and consumers in our state.

The current draft creates confusion and unnecessary costs in areas that could be addressed with science-based, farmer-friendly rules. Specifically:

- Post-harvest testing is not required under federal law and risks putting outdoor farms out of compliance. Previously, 1% Total THC was allowed under state regulations.
- THC limits (1 mg per serving, 5 mg per package) are stricter than states in the region and far below Rhode Island's prior allowance of 100 mg per tincture, which patients rely on. New limits also need to be set for the "inhalable concentrates" product type.
- Hemp pre-rolls and vape products should not be classified as tobacco, since they are cannabis products, not cigarettes. THC pre-rolls and vape cartridges are the second- and third-best-selling product categories in Rhode Island, generating roughly \$33 million in year-to-date sales. Yet hemp licensees are prohibited from producing comparable non-intoxicating versions, excluding small farms and manufacturers from a major segment of the state's cannabis economy.
- Hemp-derived beverages need clear rules. A framework based on science, such as a 15:1 CBD:THC ratio, would allow safe, accessible beverages while balancing the interests of liquor distributors, retailers, and dispensaries.

Rhode Island has the chance to build a program that protects consumers while supporting farmers and businesses across the supply chain. To do this, the Commission should align hemp regulations with federal law and regional leaders like New York and Maine, which have adopted evidence-based frameworks that support both safety and economic growth. I respectfully urge the Commission to revise the proposed regulations to remove unnecessary barriers, adopt clear product standards, and ensure fairness for all stakeholders. With these adjustments, the program will better serve Rhode Island's farmers, retailers, distributors, and consumers.

Although the period for requesting a mandatory hearing has passed, we urge the Commission to voluntarily hold an oral hearing due to the significance and statewide impact of these proposed regulations. This would allow farmers, retailers, distributors, and consumers to share experience and help the Commission craft rules that are fair, effective, and science-based.

Cheers,
Alexander Allen
Allen's Wine & Spirits
3001 East Main Road
Portsmouth, RI 02871
401-683-4030 (office)
401-787-6858 (mobile)

**Public Comment on Proposed Amendments to 560-RICR-10-20-1
Rhode Island Industrial Hemp Program**

To: Rhode Island Cannabis Control Commission

Subject: Public Comment on Proposed Amendments to 560-RICR-10-20-1 – Rhode Island Industrial Hemp Program

Date: 10/20/2025

Submitted by: Joseph V. Andreozzi IV

Business: Sherlock Hemp Farms, LLC

Email: sherlockhempfarms@gmail.com

Requestor: Joe Andreozzi, Owner / Handler/Producer

Dear Chair Ahern and Members of the Commission,

As a licensed cultivator with a Bachelor of Science in Plant Science from the University of Rhode Island, a small-business owner, and an active participant with over fifteen years of experience in the legal cannabis industry, I share the Commission’s commitment to preventing the unregulated introduction of synthetic or chemically converted intoxicants into the marketplace. My intent in submitting these comments is to contribute constructively to the refinement of the definitional framework for cannabinoids—particularly to clarify the distinction between naturally occurring and synthetically derived compounds—so that enforcement remains consistent, scientifically grounded, and supportive of responsible agricultural innovation.

Proposed Additions to § 1.5 Definitions

In reviewing regulatory frameworks across the United States, I found that while many states regulate industrial hemp primarily by limiting Δ^9 -THC and broadly prohibiting “synthetic cannabinoids,” few provide a structured taxonomy of cannabinoids or a defined list of naturally occurring compounds with a mechanism to incorporate future scientific discoveries. This gap creates uncertainty for consumers, cultivators, processors, regulators, and laboratories alike. The definitions proposed here aim to close that gap by establishing a clear, science-based hierarchy of cannabinoids—recognizing both historically identified phytocannabinoids and supporting adaptive innovation—while maintaining the Commission’s authority to restrict unregulated synthetic conversions that yield high-intensity intoxicants.

1. Cannabinoids

“**Cannabinoids**” means the class of diverse chemical compounds that act on cannabinoid receptors within the human or animal endocannabinoid system. These compounds include both **phytocannabinoids**, which occur naturally in the hemp plant, and **synthetic cannabinoids**, which are artificially manufactured or chemically converted through human-directed processes.

Cannabinoids include, but are not limited to, naturally occurring compounds such as **delta-9-tetrahydrocannabinol (Δ^9 -THC)**, **cannabidiol (CBD)**, **cannabigerol (CBG)**, **cannabinol**

Public Comment on Proposed Amendments to 560-RICR-10-20-1

Rhode Island Industrial Hemp Program

(CBN), cannabichromene (CBC), cannabidivarin (CBDV), and their respective acid, isomeric, or varinic forms.

2. Phytocannabinoids

“Phytocannabinoids” means the subclass of cannabinoids that are biosynthesized within the hemp plant through natural enzymatic and metabolic pathways. Phytocannabinoids are produced in the glandular trichomes of the plant and include, but are not limited to:

Delta-9-tetrahydrocannabinol (Δ^9 -THC), Tetrahydrocannabivarin (THCV), Cannabidiol (CBD), Cannabigerol (CBG), Cannabinol (CBN), Cannabichromene (CBC), Cannabidivarin (CBDV), Cannabigerovarin (CBGV), Cannabichromevarin (CBCV), Tetrahydrocannabinolic acid (THCA), Cannabidiolic acid (CBDA), Cannabigerolic acid (CBGA), and other cannabinoid molecules demonstrated—through peer-reviewed research or Commission-recognized scientific evidence—to be naturally produced by *the hemp plant*.

For regulatory purposes, additional phytocannabinoids may be recognized by the Commission as new analytical or genomic research confirms their natural presence within the plant, without requiring further rulemaking.

3. Synthetic Cannabinoids

“Synthetic cannabinoids” means any cannabinoid or cannabinoid analog that is artificially created or chemically converted through human-directed processes, including but not limited to the conversion of cannabidiol (CBD) or any other cannabinoid into delta-9-tetrahydrocannabinol (Δ^9 -THC), delta-8-tetrahydrocannabinol (Δ^8 -THC), or any structural or functional analog thereof produced by chemical synthesis rather than natural biosynthesis within the plant.

This term does not include **phytocannabinoids** as defined in § 1.5, or cannabinoids that result from natural post-harvest processes such as decarboxylation, oxidation, or aging of plant material.

4. Terpenes

“Terpenes” means the class of volatile organic compounds naturally produced by *hemp plant*, and other plants that contribute to aroma, flavor, and potential synergistic effects when combined with cannabinoids. Terpenes include, but are not limited to, myrcene, limonene, pinene, linalool, and caryophyllene. For purposes of this Part, terpenes derived from non-cannabis botanical sources shall be treated equivalently to hemp or cannabis-derived terpenes when used in hemp-derived products, provided they meet all applicable purity and safety standards.

Public Comment on Proposed Amendments to 560-RICR-10-20-1 Rhode Island Industrial Hemp Program

Summary

On behalf of **Sherlock Hemp Farms**, and with support from **Servant's Heart**, these comments are submitted with full respect for the Commission's ongoing efforts to align Rhode Island's Industrial Hemp Program with federal standards while maintaining public safety and regulatory clarity.

These proposed definitions intentionally remain within the scope of proposed regulations and provide a cohesive scientific framework that distinguishes natural plant biosynthesis from artificial chemical synthesis. They strengthen regulatory clarity, preserve the integrity of Rhode Island's hemp program, and align enforcement with the Cannabis Control Commission's stated goals—ensuring safety without hindering innovation and without introducing new terminology that would require further statutory integration.

Respectfully submitted,

Joseph V. Andreozzi IV

Ops Manager, Co-Founder

sherlockhempfarms@gmail.com

RE: Proposed Rules and Regulations for Industrial Hemp

Dear Commissioners and CCC Staff,

Rhode Island's cannabis cultivators have operated for almost 10 years under strict testing, tracking, and safety requirements. The same clarity and public-health standards must guide the state's hemp program. As drafted, several provisions in the proposed Industrial Hemp regulations allow intoxicating hemp products that contain delta-9-THC to be sold, creating confusion for consumers and undermining the integrity of the regulated cannabis market.

Under §1.5-A-1 and §1.5-A-2, the terms *serving* and *package* are not clearly defined. Without those definitions, products could technically meet the 0.3% THC limit by weight but still contain enough total delta-9-THC to cause intoxication. These sections should be amended to define both terms clearly and to set a total THC cap of less than one milligram of delta-9-THC per package for all hemp-derived consumable products. This ensures hemp items remain non-intoxicating and distinct from cannabis edibles.

In §1.8-I, the rule correctly prohibits Rhode Island hemp licensees from converting cannabinoids such as CBD into delta-9-THC. However, it still allows retailers to import and sell products manufactured in other states using these same conversion methods. This loophole should be closed by stating that no hemp product containing synthesized, converted, or isolated delta-9-THC may be sold in Rhode Island, regardless of where it was produced.

The advertising section, §1.11-J, also needs strengthening. Hemp products must be clearly identified as *hemp* and never marketed in a way that implies they are cannabis. Branding, logos, and imagery associated with cannabis should be prohibited to avoid consumer confusion.

Rhode Island's cannabis cultivators have earned public trust through strict oversight. Allowing hemp products with measurable or synthetic THC to enter the same market without equal accountability would erode that trust and undercut compliant local operators.

For these reasons, I respectfully urge the Commission to:

1. Define *serving* and *package* clearly and cap total delta-9-THC below one milligram.
2. Prohibit any hemp product containing synthesized or converted delta-9-THC.
3. Require labeling and marketing that clearly distinguish hemp from cannabis.

Maintaining this separation protects consumers, supports Rhode Island businesses, and keeps both programs consistent with the intent of the law.

Respectfully

Karen Ballou
Cultivators RI LLC

From: [Jon Connors](#)
To: [Inquiry, CCC](#)
Subject: Comments on Hemp Regulations
Date: Monday, October 20, 2025 11:19:33 AM

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Dear Commissioners and Staff,

Rhode Island's cannabis cultivators have operated for almost 10 years under strict testing, tracking, and safety requirements. The same clarity and public-health standards must guide the state's hemp program. As drafted, several provisions in the proposed Industrial Hemp regulations allow intoxicating hemp products that contain **delta-9-THC** to be sold, creating confusion for consumers and undermining the integrity of the regulated cannabis market.

Under **§1.5-A-1** and **§1.5-A-2**, the terms *serving* and *package* are not clearly defined. Without those definitions, products could technically meet the 0.3% THC limit by weight but still contain enough total delta-9-THC to cause intoxication. These sections should be amended to define both terms clearly and to set a **total THC cap of less than one milligram of delta-9-THC per package** for all hemp-derived consumable products. This ensures hemp items remain non-intoxicating and distinct from cannabis edibles. Additionally, it should be hemp derived products who are mandated to label any non naturally derived cannabinoids rather than legal cultivators who must soon label for delta-9-THC.

In **§1.8-I**, the rule correctly prohibits Rhode Island hemp licensees from converting cannabinoids such as CBD into delta-9-THC. However, it still allows retailers to import and sell products manufactured in other states using these same conversion methods. This loophole should be closed by stating that **no hemp product containing synthesized, converted, or isolated delta-9-THC may be sold in Rhode Island**, regardless of where it was produced.

The advertising section, **§1.11-J**, also needs strengthening. Hemp products must be clearly identified as ***hemp*** and never marketed in a way that implies they are cannabis. Branding, logos, and imagery associated with cannabis should be prohibited to avoid consumer confusion.

Rhode Island's cannabis cultivators have earned public trust through strict oversight. Allowing hemp products with measurable or synthetic THC to enter the same market without equal accountability would erode that trust and undercut compliant local operators.

For these reasons, I respectfully urge the Commission to:

1. Define *serving* and *package* clearly and cap total delta-9-THC below one milligram.
2. Prohibit any hemp product containing synthesized or converted delta-9-THC.
3. Require labeling and marketing that clearly distinguish hemp from cannabis.

Maintaining this separation protects consumers, supports Rhode Island businesses, and keeps both programs consistent with the intent of the law.

Respectfully submitted,

-Jon Connors

--

Jon Connors
General Manager
401-644-4275
Mammoth Inc





Re: Proposed Rule 560-RICR-10-20-1 – Rhode Island Industrial Hemp Program

October 1st, 2025

Dear Chair Ahern and Members of the Rhode Island Cannabis Control Commission,

Thank you for the opportunity to submit comments on the proposed rules governing Rhode Island's Industrial Hemp Program. My name is Randy Carrier, and I am the majority owner of Lovewell Farms in Hope Valley, Rhode Island. We are proud to be the state's only USDA-certified organic hemp farm. Since 2018, we have operated under the state's hemp program and worked hard to build a small, sustainable business that provides high-quality non-intoxicating products to consumers across the state; through our webstore, at farmers markets, and wholesale clients.

We support the Commission's effort to establish a regulatory framework for hemp. While much of the proposed rule carries forward DBR's existing language, that continuity is in itself part of the problem: the prior framework was never updated to reflect today's hemp market. Without modernization or clear adoption of DBR's guidance documents, these rules risk re-entrenching outdated and conflicting standards that have limited Rhode Island's hemp industry for years. Below, I outline the sections of greatest concern and provide recommendations to help align with federal law, neighboring states, and the realities of both farming and manufacturing.

After years of regulatory uncertainty and administrative carryover, Rhode Island now has the opportunity to lead with clear, fair, farmer-friendly rules that build upon, and improve, the inherited DBR framework, protecting consumers while supporting local businesses. As currently drafted, the proposed rules risk creating confusion and unnecessary costs for Rhode Islanders. We urge the Commission to consider the recommendations we have submitted, which reflect years of experience operating a hemp farm under both state and USDA regulations. With these adjustments, the program will better serve farmers, consumers, and the state's economy.

Under DBR, several interpretive guidance documents (e.g., tincture allowances, practical post-harvest total THC levels) made the rule workable. The proposed transfer does not clearly adopt those documents. Unless the Commission formally reissues or supersedes DBR's guidance, the practical flexibilities that kept the program viable ultimately vanish. However, because the Commission is now the governing authority, this represents a critical opportunity to fix the problems that DBR's rules and missing guidance left unresolved. Copying prior text may provide administrative continuity, but without modernization, it perpetuates the same barriers that have left Rhode Island with only two licensed hemp farms statewide.

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1. Post Harvest Testing of Total THC (§ 1.5.A - Acceptable Hemp THC Level)

- ⇒ The proposed regulations retain the post-harvest Total THC test originally added under DBR's framework. However, this requirement is not mandated under federal regulations (7 C.F.R. § 990) or Rhode Island's Hemp Growth Act, and it continues to impose unnecessary compliance costs, particularly for outdoor cultivators.
- ⇒ By defining Total THC to include THCa, the rule sets a compliance standard that current hemp genetics are not yet able to meet consistently, particularly for small outdoor farms.
- ⇒ Under the prior DBR guidance documents, post-harvest Total THC was permitted up to 1%, as reflected in the negligence definition of CCC's proposed regulations (§ 1.5.BB.5).

Recommendation: Remove the post-harvest Total THC test entirely, aligning Rhode Island with federal requirements of pre-harvest testing only. If retained, explicitly allow up to 1% Total THC post-harvest, consistent with prior DBR practice as demonstrated in their guidance documents.

2. THC Limits in Finished Products (§ 1.5.A - Acceptable Hemp THC Level)

- ⇒ The proposed rule limits hemp-derived consumables to 1 mg THC per serving and 5 mg per package, not required by the state's Hemp Growth Act.
- ⇒ This is far stricter than prior DBR practice, which, through guidance documents, permitted tinctures up to 100 mg THC per unit. That flexibility reflected real-world therapeutic use and market norms. Without explicit guidance in the new CCC framework, that allowance effectively disappears.
- ⇒ The 5 mg/package cap would eliminate multi-serving products such as tinctures and gummy jars, which are standard wellness products and safely used across the country.
- ⇒ The Commission's likely intent is to prevent consumers from "overconsuming" hemp-derived products as an end-run around adult-use cannabis limits. However, current scientific and market evidence suggests that such misuse is rare and largely self-limiting due to the low concentration of THC and high CBD:THC ratios in compliant hemp products. Moreover, overly restrictive THC caps risk driving consumers toward unregulated or out-of-state products, the exact opposite of what these regulations are intended to achieve.

Recommendation: Adopt a framework consistent with the region's largest cannabis market, New York, which allows up to 1 mg THC per serving and 10 mg per package for general hemp consumables, and permits higher total THC content in products that maintain a minimum 15:1 CBD:THC ratio, since such formulations are scientifically recognized as non-intoxicating. Retaining Rhode Island's prior 100 mg per tincture allowance for therapeutic products is also important for patient and consumer wellness. Finally, the Commission should consider product-by-product allowances (e.g., tinctures, beverages, gummies), which would enable product diversity and better consumer outcomes while maintaining clear safety standards.

3. THC Plants in Growing Area (§ 1.8.G - Issuance of Licensing Agreement and License)

- ⇒ As “growing area” is currently defined, this could be interpreted as the entire property, rather than just the actual rows of hemp.
- ⇒ Confusing regulatory language could lead to the prohibition of at-home recreational and medicinal THC-rich cannabis cultivation.
- ⇒ Without clarification, farmers and residents could face unintended restrictions on lawful cannabis cultivation at home or on adjacent licensed premises.

Recommendation: Define “growing area” as explicitly referring to the fields, plots, or rows designated for hemp cultivation. Clarify that THC-rich cannabis plants permitted under recreational or medical laws may be cultivated in separate locations on the same property without conflict.

4. Outdoor-Specific Testing Regulations (§ 1.9.D.1.a - Testing)

- ⇒ The proposed hemp regulations adopt indoor cultivation testing standards, which were not designed for outdoor farming environments.
- ⇒ Current thresholds reflect controlled indoor conditions and do not account for the variables of outdoor cultivation.
- ⇒ Holding outdoor hemp farms to standards written for indoor cannabis grows creates inequities and unrealistic compliance burdens for small-scale and outdoor cultivators.

Recommendation: Develop outdoor-specific testing standards that reflect the realities of field-grown hemp and cannabis. If outdoor cultivation of THC-rich cannabis will be permitted in the future, regulations should clearly address both CBD-rich hemp and THC-rich outdoor cannabis to ensure fairness and scientific accuracy. Perhaps distinct labeling could be created.

5. Explicit Hemp Seedlings Regulation (§ 1.11.G Allowable Product Types)

- ⇒ The proposed regulations do not authorize the sale of hemp seedlings or plant starts.
- ⇒ Consumers increasingly value the opportunity to grow their own hemp plants at home, both for personal wellness and as hands-on practice for cultivating legal THC-rich plants.
- ⇒ As written, the regulations create the odd scenario where Rhode Islanders may legally home-grow cannabis plants containing over 0.3% THC under the adult-use program, yet cannot legally purchase or grow hemp plants containing under 0.3% THC.
- ⇒ Allowing hemp seedlings would significantly expand farmers market opportunities and spring sales, while also serving as a powerful tool for consumer education.

Recommendation: Explicitly include hemp seedlings/plant starts ($\leq 1\%$ Total THC) as an allowable product type for retail sale.

6. Explicit Pre-Roll Regulation (§ 1.11.G Allowable Product Types)

- ⇒ Under current practice, hemp pre-rolls are classified as a tobacco product by the Division of Taxation, solely because of the rolling-paper cones used to produce them.
- ⇒ This classification subjects hemp pre-rolls to both the tobacco excise tax and the tobacco packaging rule, which requires pre-rolls to be sold in packs of at least 20, an unnecessary and impractical restriction for hemp products.
- ⇒ In contrast, dispensaries and licensed THC-rich cannabis cultivators benefit from the “Cannabis Exemption” under Rhode Island law, which allows them to sell single pre-rolls and exempts them from tobacco taxes and packaging limits.

Recommendation: Extend the “Cannabis Exemption” to hemp and CBD licensees, explicitly recognizing hemp pre-rolls (and rolling papers) as non-tobacco cannabis products. This will eliminate unfair taxation and packaging restrictions. Tobacco vice taxes are intended to discourage harmful products; by contrast, Rhode Island has recognized the medicinal and wellness benefits of cannabis. Hemp should not be penalized with inappropriate classifications and taxes. As we are regulated by the Cannabis Office of the Cannabis Control Commission, hemp should also be covered by any cannabis-related exemptions.

7. Explicit Vape Cart Regulation (§ 1.11.G Allowable Product Types)

- ⇒ Vape cartridges derived from hemp are currently classified by the Division of Taxation as “electronic nicotine delivery devices”, effectively treating them as tobacco products.
- ⇒ This misclassification has created confusion among regulators, vendors, and consumers, particularly regarding the legality of vape carts with higher Total THC percentages, even when derived from compliant hemp.
- ⇒ If vape carts are concentrated from state-certified hemp flower, they should remain a hemp product as a “concentrate intended for inhalation,” not reclassified as tobacco.

Recommendation: Collaborate with the Division of Taxation to remove hemp vape carts from the definition of tobacco products, and establish clear, product-specific Total THC limits for vape cartridges. Vape carts are one of the fastest-growing consumer preferences in the hemp market, and clarity will ensure both compliance and market growth.

8. Explicit Hemp-Derived THC Beverages Regulation (§ 1.11.G Allowable Product Types)

- ⇒ The proposed regulations do not clearly address hemp-derived beverages containing cannabinoids, creating uncertainty for hemp licensees, liquor stores, liquor distributors, cannabis cultivators, and dispensaries alike.
- ⇒ Without clarity, businesses risk conflicting interpretations from different regulatory bodies, particularly since alcoholic beverages are distributed through one channel, while hemp and cannabis beverages may be distributed through another.
- ⇒ Neighboring states and online retailers are beginning to develop explicit beverage rules, and Rhode Island should do the same to ensure consistency, safety, and fairness, and not be left behind in a burgeoning industry.

Recommendation: Establish explicit beverage regulations that:

1. Allow hemp-derived beverages under 1 mg THC per serving and 10 mg per package, with a 15:1 CBD:THC ratio allowance for higher-dose therapeutic products.
2. Clarify distribution pathways so that hemp beverages with a ratio above 15:1 (non-intoxicating) may be sold in traditional retail outlets (liquor stores, groceries, CBD shops), while beverages below 15:1 (intoxicating) are directed through cannabis dispensaries, creating clear, complementary carve-outs that benefit both sectors and keep consumers safe.
3. Ensure labeling and testing requirements are consistent with other hemp consumables, with clear dosage information for consumers.

By creating uniform standards and distribution rules, the Commission can ensure hemp-derived beverages are safe, accessible, and economically viable, while preventing unnecessary conflicts between liquor distributors, liquor stores, hemp companies, and cannabis licensees.

9. Market Equity and Access (§ 1.11.G Allowable Product Types)

- ⇒ According to Commission data, THC pre-rolls and vape cartridges are the second and third highest-selling product categories in Rhode Island's cannabis market, after flower, generating approximately \$18 million and \$15 million in year-to-date sales.
- ⇒ Yet, hemp and CBD licensees are prohibited from producing or selling these same product types in non-intoxicating forms.
- ⇒ Pre-rolls are off-limits because they are misclassified as tobacco products, and vape cartridges are effectively banned due to unclear and overly restrictive THC limits.
- ⇒ This regulatory divide prevents hemp farms and manufacturers from participating in the state's most in-demand product categories (a \$33 million market) despite being fully licensed, inspected, and compliant under the state hemp program.

Recommendation: Create clear pathways for hemp licensees to produce and sell non-intoxicating pre-rolls and vape cartridges that meet federally compliant THC limits.

Clarify that hemp pre-rolls and vape carts are not tobacco products. Establish clear, science-based THC thresholds that align with other hemp-derived consumables. Ensure hemp licensees have equitable access to product types that are already legal and regulated under the same Commission framework. This approach would support local farms, expand consumer choice, and strengthen Rhode Island's cannabis supply chain by keeping all cannabis-derived commerce (both intoxicating and non-intoxicating) safely within the state's regulated market.

10. Synthetic Cannabinoids in Product Prohibitions (§ 1.11.H.1.c - Product Prohibitions)

- ⇒ The proposed rule prohibits hemp-derived CBD products from being combined with "synthetic cannabinoids," but does not define the term.
- ⇒ Without a clear definition, naturally occurring cannabinoids such as CBG and CBN isolates risk being misclassified as synthetic, even when derived from hemp.

- ⇒ This ambiguity could create unnecessary compliance issues for vendors and limit consumer access to safe, well-documented hemp-derived products.

Recommendation: Define “synthetic cannabinoids” as compounds not naturally occurring in the cannabis plant and produced solely through artificial chemical synthesis. Clarify that hemp-derived isolates of naturally occurring cannabinoids (CBD, CBG, CBN, CBC, etc.) are permitted in hemp-derived consumable products. Perhaps include a distinction between intoxicating cannabinoids, and non-intoxicating cannabinoids.

11. CBD Consumable Storage Location (§ 1.11.K.3 - Retail Sales)

- ⇒ The current regulatory language regarding the placement of CBD consumables is unclear, creating confusion among vendors.
- ⇒ As written, the requirement for a “separate location” could be interpreted to mean that CBD products must be stored or displayed in an entirely off-site location, which is impractical and unnecessary.
- ⇒ This lack of clarity can lead to inconsistent enforcement and uncertainty for small retailers who want to remain compliant.

Recommendation: Clarify that “separate location” may mean a distinct shelf, cabinet, or room on the same premises, provided products are clearly labeled and separated from non-CBD items. This will ensure consistent application while remaining practical for retailers.

12. Hemp Extraction with Cannabis Cultivator License (§ 1.12 - Methods of Extraction)

- ⇒ Currently, no licensed extraction facilities exist in Rhode Island for hemp farms, with the nearest option located in Lewiston, Maine.
- ⇒ Hemp farmers rely on local extraction facilities with proper quality control and services to turn crops into safe, market-ready products.
- ⇒ Without accessible in-state extraction, hemp crops risk sitting in storage and deteriorating in quality, creating unnecessary losses for small farms. This can also increase testing requirements.

Recommendation: Explicitly allow licensed THC-rich cannabis cultivators to process and extract hemp under their existing cannabis license, without requiring them to obtain an additional license for \$2,500. This would reduce redundancy, expand access to extraction, and strengthen Rhode Island’s local supply chain, all while keeping processing work in-state.

13. Institute of Higher Education Protections (§ 1.14 Institutes of Higher Education)

- ⇒ This section has been part of Rhode Island’s hemp program since before the 2018 Farm Bill, yet no institution has been able to act as a designated state research facility.

- ⇒ Johnson & Wales University (JWU), which launched pioneering Bachelor of Science cannabis degree programs, has since canceled those programs, citing concerns about jeopardizing federal funding.
- ⇒ Without explicit state-level protections, universities remain unwilling to take on cannabis research, leaving this provision effectively useless despite its importance to the state's research and workforce development goals.

Recommendation: Add explicit protections for institutions of higher education to ensure they are not penalized under state law or regulation for participating in cannabis or hemp research. Rhode Island should signal strong support for cannabis science and education by shielding its universities from risk, thereby encouraging research partnerships and restoring academic leadership in this field.

Finally, I want to emphasize that my door is always open. As someone who has been part of this industry from its inception in Rhode Island, it is imperative that the experiences of farmers and small businesses are heard and respected as the Commission builds the future of hemp regulation. Although the period for requesting a mandatory hearing has passed, I respectfully urge the Commission to voluntarily hold an oral hearing given the significance of these rules. Hearing from farmers, retailers, distributors, and consumers will help ensure a fair, effective, science-based final framework. Thanks for your time and attention to this matter.

Best,

Randy Currier
Majority Owner, Lovewell Farms



Talaria, LLC
536 Atwells Ave.
Providence RI 02909

October 20th, 2025

Chairperson Kim Ahern
Commissioner Layi Oduyingbo
Commissioner Robert Jacquard
Administrator Michelle Reddish
Cannabis Control Commission
560 Jefferson Blvd.
Warwick RI, 02886

RE: Proposed Rules and Regulations for Industrial Hemp

Dear Commissioners and CCC Staff,

Overall, I urge the commission to ban all hemp derived intoxicating consumable products. The intention of the federal 2018 farm bill was to legalize cbd, a non-intoxicating cannabinoid. Through state loopholes, out of state manufacturers are, through unknown means, converting and synthesizing cbd into delta 9-thc. This delta 9-thc is the same intoxicating compound found in cannabis. In my opinion the government should either consider intoxicating delta 9-thc so dangerous that every gram must be tracked, on camera at all times, and only sold through licensed dispensaries, or the government should consider delta-9 thc to be a safe compound for adults and regulate it like alcohol with less stringent regulatory oversight, and allow delta-9 thc to be sold to anyone over the age of 21.

It defies logic that hemp derived delta-9 can be shipped in large containers with no oversight and used to make intoxicating consumable products, but cannabis derived delta-9 thc must be tracked when moved from one room to another inside a cannabis facility. I urge you to ask yourselves how large quantities of delta-9 thc can enter our state through the mail without regulatory oversight at any step of the process.

When hemp and cannabis start to overlap it only hurts the cannabis industry. In Rhode Island we have worked hard to create a highly regulated and careful cannabis industry over the last 15+ years. Allowing hemp into this space threatens in-state small businesses and potentially puts the general public at risk.



There are no studies on how safe delta-9 the synthesized from cbd is. Furthermore the proposed regulations do not allow this synthesizing or converting to happen in Rhode Island but leaves room for hemp handlers and those with consumable cbd retail licenses to buy items from states that do allow it. This simply does not make sense.

No matter what the regulations say it is also paramount that the commission and the cannabis office prioritize strict enforcement of these regulations. Enforcement by the Cannabis Control Commission should be both diligent and even-handed. The Commission should actively monitor compliance, investigate violations, and apply penalties consistently across all licensees and product categories. Non-compliant products need to be pulled from shelves and fines levied. Selective or uneven enforcement erodes trust and disadvantages compliant businesses that follow the rules. It also disadvantages the current cannabis licensees. Equal and consistent enforcement ensures a level playing field, protects consumers, and upholds the integrity of Rhode Island's regulated cannabis industry.

§1.5-A-1 and §1.5-A-2 Serving and Packaging Definitions

There is no clear definition for serving or package, nor is there clarity on how each serving must be separated. This leaves room for loopholes and crossover into the cannabis space. A serving should be packaged separately.

Additionally I believe that each serving should also have to have a 10:1 ratio of CBD to THC to ensure that cbd, the most common cannabinoid in hemp, is the main component of any hemp products sold.

§1.5-C Approved Testing Facilities

I believe that hemp products should be tested by licensed cannabis testing labs in Rhode Island and should be held to the same standards as cannabis if they are to have the same intoxicating cannabinoids.

Also labs outside of Rhode Island should have to be individually approved by the RIDOH to ensure that any out of state lab has the same or better standards that we do here.

I think there is also a gap in testing regarding shelf stability of canned drinks in particular.

§1.5-P Hemp Source

This definition includes that hemp derived consumable cbd products may contain cannabidiol derived from a hemp plant as defined in the law. I believe that if this hemp is not grown in the state when transferred into the state the buyer should have to prove that any cannabinoid in that item came from hemp and not any other plant through pre and post harvest test results from labs that are up to the same standards as ours.



§1.6 Hemp Handler Bulk Purchase

I believe there should be additional regulations added specifically about bulk out of state delta-9thc. There should be processes to ensure that it is originally derived from a hemp plant and what process was used to isolate the cannabinoids.

There is also no mention here of state storage requirements or warnings that must accompany any intoxicating products.

§1.6-E-5-7 Attestations

I believe this attestation should also include that the products were not made from synthesized materials.

§1.8-I CBD Conversions

I believe this is one of the more important aspects of these regulations. I agree that no hemp licensees should be allowed to convert cbd or any other cannabinoid into delta9-thc or any other cannabinoid. This section also states that the sale of such synthetic cannabinoids is strictly prohibited unless approved by a variance. If this is true, why are we letting out of state manufacturers do this exact thing and sell it to Rhode Island customers? This also needs better enforcement mechanisms. I believe there should be required checks done before bringing in out of state cannabinoids and further paperwork required along with stricter testing enforcement.

§1.9-D-4-a Out of State Testing Grown Hemp

How can this be enforced if out of state labs are used?

§1.9-D-7-d THC Concentration Reported by Dry Weight

Why should hemp and cannabis be tested differently? Right now cannabis is not tested on a dry weight basis. I urge you to adopt this language into the cannabis regulations to make the testing equal. In Massachusetts cannabis is tested on a dry weight basis and this would make us more competitive with that market.

§1.10-B-5 Licencing Card Fee

Cannabis licenses pay \$100 per registry card, why should this be any different from hemp licensees?

§1.10 Public Form 2

I believe that hemp licenses should also have public Form 2s like all cannabis businesses do. The public deserves some insight into who is selling these cannabinoids.

§1.11-B-1 Out of State Hemp Purchases



Licensees should only be able to receive hemp from intrastate partners that comply with the same standards we have in our state, or else it disadvantages Rhode Island businesses.

§1.11-B-2 Out of State Hemp Purchase Testing Standards

I believe that any out of test testing should also be held to the same standards as we have here in rhode island

§1.11.B-4 Enforcement for Out of State Hemp Sourcing

I believe there should be more requirements for licensees to show that anything sold complies with the act, particularly §1.8-I. I believe that for each item sold there should have to be some proof that the cannabinoids included were originally from a hemp plant and have not been synthesized. There should also be some kind of enforcement for this.

§1.11-H-1-c Product Prohibitions

Again it is stated that no hemp derived consumable cbd product intended for retail sale shall be combined with.. any synthetic cannabinoids. This needs to be proven by the licensee selling the product and should have enforcement mechanisms for the regulating body

§1.11-I-1-a Packaging Requirements

To be in line with cannabis if the product contains multiple servings it should:

Be able to be resealed in a child resistant manner unless the package contains a single-serving or application of retail-ready hemp-infused product

And

A single serving unit, if sold individually, shall be placed into a child-resistant container that may or may not be resealable.

Retail-Ready Edible Cannabis-Infused Products in Liquid Form

a.If packaged as a single serving unit, the container may be sealed using a metal crown cork style bottle cap.

b.If containing multiple serving units, the container must have a resealing cap or closure which maintains child resistance compliance.

c.If containing multiple serving units must include a measuring device such as a measuring cap, cup or dropper with the package containing the retail-ready cannabis product. Hash marks on the package do not qualify as a measuring device.

One can should be one serving



§1.11 THC Daily or Monthly Limits

There should be a limit of the total THC a customer can buy per day and I believe it should be much lower than the cannabis limit at a dispensary

§1.11-I-2-a-8 Pesticide and Nutrients Labeling Requirements

This should also include any pesticides used on the hemp while it was growing and the nutrients used.

§1.11-I-2-a Labeling Requirements

Why are none of the current hemp regulations being followed in regards to the labeling requirements. For example, the labeling requirement 8 requires solvents, gases or other chemical compounds to be listed, but I have never seen any of this listed on current available hemp delta-9 products and all of these products have used some kind of solvent. Any products on the shelves that do not meet the labeling requirements should be pulled from the shelves immediately and violators should be fined. Cannabis cultivators who have not had compliant labeling have had their products pulled from shelves and they and the dispensaries have both been fined.

§1.11-I-3-a Labeling Prohibitions

I think this section should also include a prohibition on marketing that would trick people into thinking that this product contains cannabis.

§1.11-I-4 Warnings

These warnings should have to be in a yellow box with size 8 font if it contains THC to protect children from consuming it.

§1.11-J-3 Advertising and Marketing

I believe it should be spelled out in this section that advertising should not mention THC exclusively

§1.11-M-2 Recalls

This should also include mislabeling or multiple servings not being packaged in the correct way.

§1.12-A Out of State Butane Extraction

This should be true for this state and others and should have to be proven by the licence buying it.

§1.12-D Out of State CBD Conversions

Again, if this is not allowed in the state why are we allowing other states to do it and sell those products in rhode island. This section should be better enforced



§1.13-A-1 Out of State Laboratory Standards

A certified laboratory should be approved by the RIDOH to be in compliance with our own regulations.

§1.13-A-(1-7) End of Year Reporting for CBD Consumables

These should be required for CBD consumables bought from out of state

§1.13-D-1-a Public Information

This information should be available to the public if a customer asks.

§1.13-D-2 and 3 Public Information

This reporting should be required for all licence types

Sincerely,

Sasha Gorski
Talaria LLC

RE: Proposed Rules and Regulations for Industrial Hemp

Dear Commissioners and CCC Staff,

Rhode Island's cannabis cultivators have operated for almost 10 years under strict testing, tracking, and safety requirements. The same clarity and public-health standards must guide the state's hemp program. As drafted, several provisions in the proposed Industrial Hemp regulations allow intoxicating hemp products that contain delta-9-THC to be sold, creating confusion for consumers and undermining the integrity of the regulated cannabis market.

Under §1.5-A-1 and §1.5-A-2, the terms *serving* and *package* are not clearly defined. Without those definitions, products could technically meet the 0.3% THC limit by weight but still contain enough total delta-9-THC to cause intoxication. These sections should be amended to define both terms clearly and to set a total THC cap of less than one milligram of delta-9-THC per package for all hemp-derived consumable products. This ensures hemp items remain non-intoxicating and distinct from cannabis edibles.

In §1.8-I, the rule correctly prohibits Rhode Island hemp licensees from converting cannabinoids such as CBD into delta-9-THC. However, it still allows retailers to import and sell products manufactured in other states using these same conversion methods. This loophole should be closed by stating that no hemp product containing synthesized, converted, or isolated delta-9-THC may be sold in Rhode Island, regardless of where it was produced.

The advertising section, §1.11-J, also needs strengthening. Hemp products must be clearly identified as *hemp* and never marketed in a way that implies they are cannabis. Branding, logos, and imagery associated with cannabis should be prohibited to avoid consumer confusion.

Rhode Island's cannabis cultivators have earned public trust through strict oversight. Allowing hemp products with measurable or synthetic THC to enter the same market without equal accountability would erode that trust and undercut compliant local operators.

For these reasons, I respectfully urge the Commission to:

1. Define *serving* and *package* clearly and cap total delta-9-THC below one milligram.
2. Prohibit any hemp product containing synthesized or converted delta-9-THC.
3. Require labeling and marketing that clearly distinguish hemp from cannabis.

Maintaining this separation protects consumers, supports Rhode Island businesses, and keeps both programs consistent with the intent of the law.

Respectfully submitted,

Christopher Jardin and Nicole Jardin



Servant's Heart Natural Well-Being Products
21 Fairhaven Rd.
Cumberland, RI 02864
RI CBD Distributor License #: LCD0013-500
RI CBD Retailer License #: LCR0043-500

Dear Chair Ahern and Commission Members,

We appreciate the opportunity to provide formal public comment regarding the proposed changes to **Rhode Island's Industrial Hemp Program (560-RICR-10-20-1)**.

As licensed cultivators/retailers/distributors and small-business owners—Joe Andreozzi from Sherlock Hemp Farms, holding a BS in Plant Science from the University of Rhode Island with more than 15 years in the legal cannabis sector, and Jason King, owner of Servant's Heart, possessing an MPH in Regulatory Affairs for Cannabis Control from Clark University and who worked on several cannabis bills (including the 2020 Hemp Bill “Survive and Thrive” legislation that was signed into law) in the Massachusetts Senate as a legislative director—we align with the Commission's goal of blocking unregulated synthetic or chemically altered intoxicants from entering the market. Joe Andreozzi, from Sherlock Hemp Farms has also sent in similar public comments.

Through these joint comments, we aim to offer helpful input toward improving the cannabinoid definitional structure—especially by sharpening the line between naturally derived and synthetically produced substances—to ensure enforcement stays uniform, evidence-based, and conducive to ethical farming advancements.

Suggested Additions to § 1.5 Definitions

Our examination of hemp regulations nationwide revealed that although most states focus on capping Δ^9 -THC levels and banning “synthetic cannabinoids” in general, very few offer a systematic classification of cannabinoids or a specific roster of natural compounds, along with a process for adding future discoveries. This shortfall breeds confusion among consumers, growers, processors, officials, and testing labs. The following definitions seek to address it by creating a precise, research-driven categorization of cannabinoids—one that honors established phytocannabinoids while enabling flexible progress—and preserves the Commission's power to prohibit unauthorized synthetic modifications producing potent intoxicants.

Cannabinoids

“Cannabinoids” refers to the broad group of chemical substances that interact with cannabinoid receptors in the human or animal endocannabinoid system. This group encompasses

phytocannabinoids, such as delta-9-tetrahydrocannabinol (Δ^9 -THC), cannabidiol (CBD), cannabigerol (CBG), cannabinol (CBN), cannabichromene (CBC), cannabidivarin (CBDV), and their acid, isomeric, or varinic variants, which occur ...

Phytocannabinoids

“Phytocannabinoids” refers to the subset of cannabinoids biosynthesized in the hemp plant via natural enzymatic and metabolic processes. These are generated in the glandular trichomes ... for regulatory purposes, the Commission may approve additional phytocannabinoids as emerging analytical or genomic studies verify their natural occurrence in the plant, without needing new rulemaking.

Synthetic Cannabinoids

“Synthetic cannabinoids” refers to any cannabinoid or analog produced artificially or via human-led chemical alteration, such as the conversion of ... from the plant. This excludes phytocannabinoids per § 1.5, or those arising from standard post-harvest natural changes like decarboxylation, oxidation, or aging of plant matter.

Terpenes

“Terpenes” refers to the category of volatile organic compounds produced naturally by the hemp plant, and other plants, which enhance aroma, flavor, and possible synergistic benefits alongside cannabinoids. ... Terpenes sourced from non-cannabis botanicals must be regarded the same as cannabis-derived ones in hemp products, assuming they comply with all relevant purity and safety requirements.

Please do not hesitate to contact the owner of Servant's Heart with any questions or issues.

Sincerely,

Jason M. King

Owner

jason@servantsheartglobal.com



Re: Proposed Rule 560-RICR-10-20-1 – Rhode Island Industrial Hemp Program

October 1st, 2025

Dear Chair Ahern and Members of the Rhode Island Cannabis Control Commission,

Thank you for the opportunity to submit comments on the proposed rules governing Rhode Island's Industrial Hemp Program. My name is Ryan Plante, and I am co-founder of Lovewell Farms in Hope Valley, Rhode Island. We are proud to be the state's only USDA-certified organic hemp farm. Since 2018, we have operated under the state's hemp program and worked hard to build a small, sustainable business that provides high-quality non-intoxicating products to consumers across the state; through our webstore, at farmers markets, and wholesale clients.

We support the Commission's effort to establish a regulatory framework for hemp. While much of the proposed rule carries forward DBR's existing language, that continuity is in itself part of the problem: the prior framework was never updated to reflect today's hemp market. Without modernization or clear adoption of DBR's guidance documents, these rules risk re-entrenching outdated and conflicting standards that have limited Rhode Island's hemp industry for years. Below, I outline the sections of greatest concern and provide recommendations to help align with federal law, neighboring states, and the realities of both farming and manufacturing.

After years of regulatory uncertainty and administrative carryover, Rhode Island now has the opportunity to lead with clear, fair, farmer-friendly rules that build upon, and improve, the inherited DBR framework, protecting consumers while supporting local businesses. As currently drafted, the proposed rules risk creating confusion and unnecessary costs for Rhode Islanders. We urge the Commission to consider the recommendations we have submitted, which reflect years of experience operating a hemp farm under both state and USDA regulations. With these adjustments, the program will better serve farmers, consumers, and the state's economy.

Under DBR, several interpretive guidance documents (e.g., tincture allowances, practical post-harvest total THC levels) made the rule workable. The proposed transfer does not clearly adopt those documents. Unless the Commission formally reissues or supersedes DBR's guidance, the practical flexibilities that kept the program viable ultimately vanish. However, because the Commission is now the governing authority, this represents a critical opportunity to fix the problems that DBR's rules and missing guidance left unresolved. Copying prior text may provide administrative continuity, but without modernization, it perpetuates the same barriers that have left Rhode Island with only two licensed hemp farms statewide.

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1. Post Harvest Testing of Total THC (§ 1.5.A - Acceptable Hemp THC Level)

- ⇒ The proposed regulations retain the post-harvest Total THC test originally added under DBR's framework. However, this requirement is not mandated under federal regulations (7 C.F.R. § 990) or Rhode Island's Hemp Growth Act, and it continues to impose unnecessary compliance costs, particularly for outdoor cultivators.
- ⇒ By defining Total THC to include THCa, the rule sets a compliance standard that current hemp genetics are not yet able to meet consistently, particularly for small outdoor farms.
- ⇒ Under the prior DBR guidance documents, post-harvest Total THC was permitted up to 1%, as reflected in the negligence definition of CCC's proposed regulations (§ 1.5.BB.5).

Recommendation: Remove the post-harvest Total THC test entirely, aligning Rhode Island with federal requirements of pre-harvest testing only. If retained, explicitly allow up to 1% Total THC post-harvest, consistent with prior DBR practice as demonstrated in their guidance documents.

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- ⇒ The proposed rule limits hemp-derived consumables to 1 mg THC per serving and 5 mg per package, not required by the state's Hemp Growth Act.
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- ⇒ The 5 mg/package cap would eliminate multi-serving products such as tinctures and gummy jars, which are standard wellness products and safely used across the country.
- ⇒ The Commission's likely intent is to prevent consumers from "overconsuming" hemp-derived products as an end-run around adult-use cannabis limits. However, current scientific and market evidence suggests that such misuse is rare and largely self-limiting due to the low concentration of THC and high CBD:THC ratios in compliant hemp products. Moreover, overly restrictive THC caps risk driving consumers toward unregulated or out-of-state products, the exact opposite of what these regulations are intended to achieve.

Recommendation: Adopt a framework consistent with the region's largest cannabis market, New York, which allows up to 1 mg THC per serving and 10 mg per package for general hemp consumables, and permits higher total THC content in products that maintain a minimum 15:1 CBD:THC ratio, since such formulations are scientifically recognized as non-intoxicating. Retaining Rhode Island's prior 100 mg per tincture allowance for therapeutic products is also important for patient and consumer wellness. Finally, the Commission should consider product-by-product allowances (e.g., tinctures, beverages, gummies), which would enable product diversity and better consumer outcomes while maintaining clear safety standards.

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- ⇒ As “growing area” is currently defined, this could be interpreted as the entire property, rather than just the actual rows of hemp.
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Recommendation: Define “growing area” as explicitly referring to the fields, plots, or rows designated for hemp cultivation. Clarify that THC-rich cannabis plants permitted under recreational or medical laws may be cultivated in separate locations on the same property without conflict.

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- ⇒ The proposed hemp regulations adopt indoor cultivation testing standards, which were not designed for outdoor farming environments.
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Recommendation: Develop outdoor-specific testing standards that reflect the realities of field-grown hemp and cannabis. If outdoor cultivation of THC-rich cannabis will be permitted in the future, regulations should clearly address both CBD-rich hemp and THC-rich outdoor cannabis to ensure fairness and scientific accuracy. Perhaps distinct labeling could be created.

5. Explicit Hemp Seedlings Regulation (§ 1.11.G Allowable Product Types)

- ⇒ The proposed regulations do not authorize the sale of hemp seedlings or plant starts.
- ⇒ Consumers increasingly value the opportunity to grow their own hemp plants at home, both for personal wellness and as hands-on practice for cultivating legal THC-rich plants.
- ⇒ As written, the regulations create the odd scenario where Rhode Islanders may legally home-grow cannabis plants containing over 0.3% THC under the adult-use program, yet cannot legally purchase or grow hemp plants containing under 0.3% THC.
- ⇒ Allowing hemp seedlings would significantly expand farmers market opportunities and spring sales, while also serving as a powerful tool for consumer education.

Recommendation: Explicitly include hemp seedlings/plant starts ($\leq 1\%$ Total THC) as an allowable product type for retail sale.

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- ⇒ Under current practice, hemp pre-rolls are classified as a tobacco product by the Division of Taxation, solely because of the rolling-paper cones used to produce them.

- ⇒ This classification subjects hemp pre-rolls to both the tobacco excise tax and the tobacco packaging rule, which requires pre-rolls to be sold in packs of at least 20, an unnecessary and impractical restriction for hemp products.
- ⇒ In contrast, dispensaries and licensed THC-rich cannabis cultivators benefit from the “Cannabis Exemption” under Rhode Island law, which allows them to sell single pre-rolls and exempts them from tobacco taxes and packaging limits.

Recommendation: Extend the “Cannabis Exemption” to hemp and CBD licensees, explicitly recognizing hemp pre-rolls (and rolling papers) as non-tobacco cannabis products. This will eliminate unfair taxation and packaging restrictions. Tobacco vice taxes are intended to discourage harmful products; by contrast, Rhode Island has recognized the medicinal and wellness benefits of cannabis. Hemp should not be penalized with inappropriate classifications and taxes. As we are regulated by the Cannabis Office of the Cannabis Control Commission, hemp should also be covered by any cannabis-related exemptions.

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- ⇒ Vape cartridges derived from hemp are currently classified by the Division of Taxation as “electronic nicotine delivery devices”, effectively treating them as tobacco products.
- ⇒ This misclassification has created confusion among regulators, vendors, and consumers, particularly regarding the legality of vape carts with higher Total THC percentages, even when derived from compliant hemp.
- ⇒ If vape carts are concentrated from state-certified hemp flower, they should remain a hemp product as a “concentrate intended for inhalation,” not reclassified as tobacco.

Recommendation: Collaborate with the Division of Taxation to remove hemp vape carts from the definition of tobacco products, and establish clear, product-specific Total THC limits for vape cartridges. Vape carts are one of the fastest-growing consumer preferences in the hemp market, and clarity will ensure both compliance and market growth.

8. Explicit Hemp-Derived THC Beverages Regulation (§ 1.11.G Allowable Product Types)

- ⇒ The proposed regulations do not clearly address hemp-derived beverages containing cannabinoids, creating uncertainty for hemp licensees, liquor stores, liquor distributors, cannabis cultivators, and dispensaries alike.
- ⇒ Without clarity, businesses risk conflicting interpretations from different regulatory bodies, particularly since alcoholic beverages are distributed through one channel, while hemp and cannabis beverages may be distributed through another.
- ⇒ Neighboring states and online retailers are beginning to develop explicit beverage rules, and Rhode Island should do the same to ensure consistency, safety, and fairness, and not be left behind in a burgeoning industry.

Recommendation: Establish explicit beverage regulations that:

1. Allow hemp-derived beverages under 1 mg THC per serving and 10 mg per package, with a 15:1 CBD:THC ratio allowance for higher-dose therapeutic products.
2. Clarify distribution pathways so that hemp beverages with a ratio above 15:1 (non-intoxicating) may be sold in traditional retail outlets (liquor stores, groceries, CBD shops), while beverages below 15:1 (intoxicating) are directed through cannabis dispensaries, creating clear, complementary carve-outs that benefit both sectors and keep consumers safe.
3. Ensure labeling and testing requirements are consistent with other hemp consumables, with clear dosage information for consumers.

By creating uniform standards and distribution rules, the Commission can ensure hemp-derived beverages are safe, accessible, and economically viable, while preventing unnecessary conflicts between liquor distributors, liquor stores, hemp companies, and cannabis licensees.

9. Market Equity and Access (§ 1.11.G Allowable Product Types)

- ⇒ According to Commission data, THC pre-rolls and vape cartridges are the second and third highest-selling product categories in Rhode Island's cannabis market, after flower, generating approximately \$18 million and \$15 million in year-to-date sales.
- ⇒ Yet, hemp and CBD licensees are prohibited from producing or selling these same product types in non-intoxicating forms.
- ⇒ Pre-rolls are off-limits because they are misclassified as tobacco products, and vape cartridges are effectively banned due to unclear and overly restrictive THC limits.
- ⇒ This regulatory divide prevents hemp farms and manufacturers from participating in the state's most in-demand product categories (a \$33 million market) despite being fully licensed, inspected, and compliant under the state hemp program.

Recommendation: Create clear pathways for hemp licensees to produce and sell non-intoxicating pre-rolls and vape cartridges that meet federally compliant THC limits. Clarify that hemp pre-rolls and vape carts are not tobacco products. Establish clear, science-based THC thresholds that align with other hemp-derived consumables. Ensure hemp licensees have equitable access to product types that are already legal and regulated under the same Commission framework. This approach would support local farms, expand consumer choice, and strengthen Rhode Island's cannabis supply chain by keeping all cannabis-derived commerce (both intoxicating and non-intoxicating) safely within the state's regulated market.

10. Synthetic Cannabinoids in Product Prohibitions (§ 1.11.H.1.c - Product Prohibitions)

- ⇒ The proposed rule prohibits hemp-derived CBD products from being combined with "synthetic cannabinoids," but does not define the term.
- ⇒ Without a clear definition, naturally occurring cannabinoids such as CBG and CBN isolates risk being misclassified as synthetic, even when derived from hemp.
- ⇒ This ambiguity could create unnecessary compliance issues for vendors and limit consumer access to safe, well-documented hemp-derived products.

Recommendation: Define “synthetic cannabinoids” as compounds not naturally occurring in the cannabis plant and produced solely through artificial chemical synthesis. Clarify that hemp-derived isolates of naturally occurring cannabinoids (CBD, CBG, CBN, CBC, etc.) are permitted in hemp-derived consumable products. Perhaps include a distinction between intoxicating cannabinoids, and non-intoxicating cannabinoids.

11. CBD Consumable Storage Location (§ 1.11.K.3 - Retail Sales)

- ⇒ The current regulatory language regarding the placement of CBD consumables is unclear, creating confusion among vendors.
- ⇒ As written, the requirement for a “separate location” could be interpreted to mean that CBD products must be stored or displayed in an entirely off-site location, which is impractical and unnecessary.
- ⇒ This lack of clarity can lead to inconsistent enforcement and uncertainty for small retailers who want to remain compliant.

Recommendation: Clarify that “separate location” may mean a distinct shelf, cabinet, or room on the same premises, provided products are clearly labeled and separated from non-CBD items. This will ensure consistent application while remaining practical for retailers.

12. Hemp Extraction with Cannabis Cultivator License (§ 1.12 - Methods of Extraction)

- ⇒ Currently, no licensed extraction facilities exist in Rhode Island for hemp farms, with the nearest option located in Lewiston, Maine.
- ⇒ Hemp farmers rely on local extraction facilities with proper quality control and services to turn crops into safe, market-ready products.
- ⇒ Without accessible in-state extraction, hemp crops risk sitting in storage and deteriorating in quality, creating unnecessary losses for small farms. This can also increase testing requirements.

Recommendation: Explicitly allow licensed THC-rich cannabis cultivators to process and extract hemp under their existing cannabis license, without requiring them to obtain an additional license for \$2,500. This would reduce redundancy, expand access to extraction, and strengthen Rhode Island’s local supply chain, all while keeping processing work in-state.

13. Institute of Higher Education Protections (§ 1.14 Institutes of Higher Education)

- ⇒ This section has been part of Rhode Island’s hemp program since before the 2018 Farm Bill, yet no institution has been able to act as a designated state research facility.
- ⇒ Johnson & Wales University (JWU), which launched pioneering Bachelor of Science cannabis degree programs, has since canceled those programs, citing concerns about jeopardizing federal funding.

⇒ Without explicit state-level protections, universities remain unwilling to take on cannabis research, leaving this provision effectively useless despite its importance to the state's research and workforce development goals.

Recommendation: Add explicit protections for institutions of higher education to ensure they are not penalized under state law or regulation for participating in cannabis or hemp research. Rhode Island should signal strong support for cannabis science and education by shielding its universities from risk, thereby encouraging research partnerships and restoring academic leadership in this field.

Finally, I want to emphasize that my door is always open. As someone who has been part of this industry from its inception in Rhode Island, it is imperative that the experiences of farmers and small businesses are heard and respected as the Commission builds the future of hemp regulation. Although the period for requesting a mandatory hearing has passed, I respectfully urge the Commission to voluntarily hold an oral hearing given the significance of these rules. Hearing from farmers, retailers, distributors, and consumers will help ensure a fair, effective, science-based final framework. Thanks for your time and attention to this matter.

Best,

Ryan Plane
Co Owner, Lovewell Farms

From: [Henry Ritchotte](#)
To: [Inquiry, CCC](#)
Subject: Industrial Hemp
Date: Monday, October 20, 2025 2:57:23 PM

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RE: Proposed Rules and Regulations for Industrial Hemp

Dear Commissioners and CCC Staff,

Rhode Island's cannabis cultivators have operated for almost 10 years under strict testing, tracking, and safety requirements. The same clarity and public-health standards must guide the state's hemp program. As drafted, several provisions in the proposed Industrial Hemp regulations allow intoxicating hemp products that contain delta-9-THC to be sold, creating confusion for consumers and undermining the integrity of the regulated cannabis market.

Under §1.5-A-1 and §1.5-A-2, the terms *serving* and *package* are not clearly defined. Without those definitions, products could technically meet the 0.3% THC limit by weight but still contain enough total delta-9-THC to cause intoxication. These sections should be amended to define both terms clearly and to set a total THC cap of less than one milligram of delta-9-THC per package for all hemp-derived consumable products. This ensures hemp items remain non-intoxicating and distinct from cannabis edibles.

In §1.8-I, the rule correctly prohibits Rhode Island hemp licensees from converting cannabinoids such as CBD into delta-9-THC. However, it still allows retailers to import and sell products manufactured in other states using these same conversion methods. This loophole should be closed by stating that no hemp product containing synthesized, converted, or isolated delta-9-THC may be sold in Rhode Island, regardless of where it was produced.

The advertising section, §1.11-J, also needs strengthening. Hemp products must be clearly identified as *hemp* and never marketed in a way that implies they are cannabis. Branding, logos, and imagery associated with cannabis should be prohibited to avoid consumer confusion.

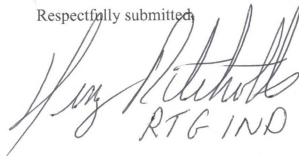
Rhode Island's cannabis cultivators have earned public trust through strict oversight. Allowing hemp products with measurable or synthetic THC to enter the same market without equal accountability would erode that trust and undercut compliant local operators.

For these reasons, I respectfully urge the Commission to:

1. Define *serving* and *package* clearly and cap total delta-9-THC below one milligram.
2. Prohibit any hemp product containing synthesized or converted delta-9-THC.
3. Require labeling and marketing that clearly distinguish hemp from cannabis.

Maintaining this separation protects consumers, supports Rhode Island businesses, and keeps both programs consistent with the intent of the law.

Respectfully submitted,


RTG IND d/b/a Hank's Herbs



Re: Proposed Rule 560-RICR-10-20-1 – Rhode Island Industrial Hemp Program

October 1st, 2025

Dear Chair Ahern and Members of the Rhode Island Cannabis Control Commission,

Thank you for the opportunity to submit comments on the proposed rules governing Rhode Island's Industrial Hemp Program. My name is Mike Simpson, and I am co-founder of Lovewell Farms in Hope Valley, Rhode Island. We are proud to be the state's only USDA-certified organic hemp farm. Since 2018, we have operated under the state's hemp program and worked hard to build a small, sustainable business that provides high-quality non-intoxicating products to consumers across the state; through our webstore, at farmers markets, and wholesale clients.

We support the Commission's effort to establish a regulatory framework for hemp. While much of the proposed rule carries forward DBR's existing language, that continuity is in itself part of the problem: the prior framework was never updated to reflect today's hemp market. Without modernization or clear adoption of DBR's guidance documents, these rules risk re-entrenching outdated and conflicting standards that have limited Rhode Island's hemp industry for years. Below, I outline the sections of greatest concern and provide recommendations to help align with federal law, neighboring states, and the realities of both farming and manufacturing.

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- ⇒ This section has been part of Rhode Island’s hemp program since before the 2018 Farm Bill, yet no institution has been able to act as a designated state research facility.
- ⇒ Johnson & Wales University (JWU), which launched pioneering Bachelor of Science cannabis degree programs, has since canceled those programs, citing concerns about jeopardizing federal funding.

⇒ Without explicit state-level protections, universities remain unwilling to take on cannabis research, leaving this provision effectively useless despite its importance to the state's research and workforce development goals.

Recommendation: Add explicit protections for institutions of higher education to ensure they are not penalized under state law or regulation for participating in cannabis or hemp research. Rhode Island should signal strong support for cannabis science and education by shielding its universities from risk, thereby encouraging research partnerships and restoring academic leadership in this field.

Finally, I want to emphasize that my door is always open. As someone who has been part of this industry from its inception in Rhode Island, it is imperative that the experiences of farmers and small businesses are heard and respected as the Commission builds the future of hemp regulation. Although the period for requesting a mandatory hearing has passed, I respectfully urge the Commission to voluntarily hold an oral hearing given the significance of these rules. Hearing from farmers, retailers, distributors, and consumers will help ensure a fair, effective, science-based final framework. Thanks for your time and attention to this matter.

Best,

A handwritten signature in black ink, appearing to read 'Mike Simpson', with a long horizontal line extending to the right.

Mike Simpson
Co-Founder, Lovewell Farms



Re: Proposed Rule 560-RICR-10-20-1 – Rhode Island Industrial Hemp Program

October 1st, 2025

Dear Chair Ahern and Members of the Rhode Island Cannabis Control Commission,

Thank you for the opportunity to submit comments on the proposed rules governing Rhode Island's Industrial Hemp Program. My name is Casey Sturts, and I am Director of Sales for Lovewell Farms in Hope Valley, Rhode Island. We are proud to be the state's only USDA-certified organic hemp farm. Since 2018, we have operated under the state's hemp program and worked hard to build a small, sustainable business that provides high-quality non-intoxicating products to consumers across the state; through our webstore, at farmers markets, and wholesale clients.

We support the Commission's effort to establish a regulatory framework for hemp. While much of the proposed rule carries forward DBR's existing language, that continuity is in itself part of the problem: the prior framework was never updated to reflect today's hemp market. Without modernization or clear adoption of DBR's guidance documents, these rules risk re-entrenching outdated and conflicting standards that have limited Rhode Island's hemp industry for years. Below, I outline the sections of greatest concern and provide recommendations to help align with federal law, neighboring states, and the realities of both farming and manufacturing.

After years of regulatory uncertainty and administrative carryover, Rhode Island now has the opportunity to lead with clear, fair, farmer-friendly rules that build upon, and improve, the inherited DBR framework, protecting consumers while supporting local businesses. As currently drafted, the proposed rules risk creating confusion and unnecessary costs for Rhode Islanders. We urge the Commission to consider the recommendations we have submitted, which reflect years of experience operating a hemp farm under both state and USDA regulations. With these adjustments, the program will better serve farmers, consumers, and the state's economy.

Under DBR, several interpretive guidance documents (e.g., tincture allowances, practical post-harvest total THC levels) made the rule workable. The proposed transfer does not clearly adopt those documents. Unless the Commission formally reissues or supersedes DBR's guidance, the practical flexibilities that kept the program viable ultimately vanish. However, because the Commission is now the governing authority, this represents a critical opportunity to fix the problems that DBR's rules and missing guidance left unresolved. Copying prior text may provide administrative continuity, but without modernization, it perpetuates the same barriers that have left Rhode Island with only two licensed hemp farms statewide.

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1. Post Harvest Testing of Total THC (§ 1.5.A - Acceptable Hemp THC Level)

- ⇒ The proposed regulations retain the post-harvest Total THC test originally added under DBR's framework. However, this requirement is not mandated under federal regulations (7 C.F.R. § 990) or Rhode Island's Hemp Growth Act, and it continues to impose unnecessary compliance costs, particularly for outdoor cultivators.
- ⇒ By defining Total THC to include THCa, the rule sets a compliance standard that current hemp genetics are not yet able to meet consistently, particularly for small outdoor farms.
- ⇒ Under the prior DBR guidance documents, post-harvest Total THC was permitted up to 1%, as reflected in the negligence definition of CCC's proposed regulations (§ 1.5.BB.5).

Recommendation: Remove the post-harvest Total THC test entirely, aligning Rhode Island with federal requirements of pre-harvest testing only. If retained, explicitly allow up to 1% Total THC post-harvest, consistent with prior DBR practice as demonstrated in their guidance documents.

2. THC Limits in Finished Products (§ 1.5.A - Acceptable Hemp THC Level)

- ⇒ The proposed rule limits hemp-derived consumables to 1 mg THC per serving and 5 mg per package, not required by the state's Hemp Growth Act.
- ⇒ This is far stricter than prior DBR practice, which, through guidance documents, permitted tinctures up to 100 mg THC per unit. That flexibility reflected real-world therapeutic use and market norms. Without explicit guidance in the new CCC framework, that allowance effectively disappears.
- ⇒ The 5 mg/package cap would eliminate multi-serving products such as tinctures and gummy jars, which are standard wellness products and safely used across the country.
- ⇒ The Commission's likely intent is to prevent consumers from "overconsuming" hemp-derived products as an end-run around adult-use cannabis limits. However, current scientific and market evidence suggests that such misuse is rare and largely self-limiting due to the low concentration of THC and high CBD:THC ratios in compliant hemp products. Moreover, overly restrictive THC caps risk driving consumers toward unregulated or out-of-state products, the exact opposite of what these regulations are intended to achieve.

Recommendation: Adopt a framework consistent with the region's largest cannabis market, New York, which allows up to 1 mg THC per serving and 10 mg per package for general hemp consumables, and permits higher total THC content in products that maintain a minimum 15:1 CBD:THC ratio, since such formulations are scientifically recognized as non-intoxicating. Retaining Rhode Island's prior 100 mg per tincture allowance for therapeutic products is also important for patient and consumer wellness. Finally, the Commission should consider product-by-product allowances (e.g., tinctures, beverages, gummies), which would enable product diversity and better consumer outcomes while maintaining clear safety standards.

3. THC Plants in Growing Area (§ 1.8.G - Issuance of Licensing Agreement and License)

- ⇒ As “growing area” is currently defined, this could be interpreted as the entire property, rather than just the actual rows of hemp.
- ⇒ Confusing regulatory language could lead to the prohibition of at-home recreational and medicinal THC-rich cannabis cultivation.
- ⇒ Without clarification, farmers and residents could face unintended restrictions on lawful cannabis cultivation at home or on adjacent licensed premises.

Recommendation: Define “growing area” as explicitly referring to the fields, plots, or rows designated for hemp cultivation. Clarify that THC-rich cannabis plants permitted under recreational or medical laws may be cultivated in separate locations on the same property without conflict.

4. Outdoor-Specific Testing Regulations (§ 1.9.D.1.a - Testing)

- ⇒ The proposed hemp regulations adopt indoor cultivation testing standards, which were not designed for outdoor farming environments.
- ⇒ Current thresholds reflect controlled indoor conditions and do not account for the variables of outdoor cultivation.
- ⇒ Holding outdoor hemp farms to standards written for indoor cannabis grows creates inequities and unrealistic compliance burdens for small-scale and outdoor cultivators.

Recommendation: Develop outdoor-specific testing standards that reflect the realities of field-grown hemp and cannabis. If outdoor cultivation of THC-rich cannabis will be permitted in the future, regulations should clearly address both CBD-rich hemp and THC-rich outdoor cannabis to ensure fairness and scientific accuracy. Perhaps distinct labeling could be created.

5. Explicit Hemp Seedlings Regulation (§ 1.11.G Allowable Product Types)

- ⇒ The proposed regulations do not authorize the sale of hemp seedlings or plant starts.
- ⇒ Consumers increasingly value the opportunity to grow their own hemp plants at home, both for personal wellness and as hands-on practice for cultivating legal THC-rich plants.
- ⇒ As written, the regulations create the odd scenario where Rhode Islanders may legally home-grow cannabis plants containing over 0.3% THC under the adult-use program, yet cannot legally purchase or grow hemp plants containing under 0.3% THC.
- ⇒ Allowing hemp seedlings would significantly expand farmers market opportunities and spring sales, while also serving as a powerful tool for consumer education.

Recommendation: Explicitly include hemp seedlings/plant starts ($\leq 1\%$ Total THC) as an allowable product type for retail sale.

6. Explicit Pre-Roll Regulation (§ 1.11.G Allowable Product Types)

- ⇒ Under current practice, hemp pre-rolls are classified as a tobacco product by the Division of Taxation, solely because of the rolling-paper cones used to produce them.
- ⇒ This classification subjects hemp pre-rolls to both the tobacco excise tax and the tobacco packaging rule, which requires pre-rolls to be sold in packs of at least 20, an unnecessary and impractical restriction for hemp products.
- ⇒ In contrast, dispensaries and licensed THC-rich cannabis cultivators benefit from the “Cannabis Exemption” under Rhode Island law, which allows them to sell single pre-rolls and exempts them from tobacco taxes and packaging limits.

Recommendation: Extend the “Cannabis Exemption” to hemp and CBD licensees, explicitly recognizing hemp pre-rolls (and rolling papers) as non-tobacco cannabis products. This will eliminate unfair taxation and packaging restrictions. Tobacco vice taxes are intended to discourage harmful products; by contrast, Rhode Island has recognized the medicinal and wellness benefits of cannabis. Hemp should not be penalized with inappropriate classifications and taxes. As we are regulated by the Cannabis Office of the Cannabis Control Commission, hemp should also be covered by any cannabis-related exemptions.

7. Explicit Vape Cart Regulation (§ 1.11.G Allowable Product Types)

- ⇒ Vape cartridges derived from hemp are currently classified by the Division of Taxation as “electronic nicotine delivery devices”, effectively treating them as tobacco products.
- ⇒ This misclassification has created confusion among regulators, vendors, and consumers, particularly regarding the legality of vape carts with higher Total THC percentages, even when derived from compliant hemp.
- ⇒ If vape carts are concentrated from state-certified hemp flower, they should remain a hemp product as a “concentrate intended for inhalation,” not reclassified as tobacco.

Recommendation: Collaborate with the Division of Taxation to remove hemp vape carts from the definition of tobacco products, and establish clear, product-specific Total THC limits for vape cartridges. Vape carts are one of the fastest-growing consumer preferences in the hemp market, and clarity will ensure both compliance and market growth.

8. Explicit Hemp-Derived THC Beverages Regulation (§ 1.11.G Allowable Product Types)

- ⇒ The proposed regulations do not clearly address hemp-derived beverages containing cannabinoids, creating uncertainty for hemp licensees, liquor stores, liquor distributors, cannabis cultivators, and dispensaries alike.
- ⇒ Without clarity, businesses risk conflicting interpretations from different regulatory bodies, particularly since alcoholic beverages are distributed through one channel, while hemp and cannabis beverages may be distributed through another.
- ⇒ Neighboring states and online retailers are beginning to develop explicit beverage rules, and Rhode Island should do the same to ensure consistency, safety, and fairness, and not be left behind in a burgeoning industry.

Recommendation: Establish explicit beverage regulations that:

1. Allow hemp-derived beverages under 1 mg THC per serving and 10 mg per package, with a 15:1 CBD:THC ratio allowance for higher-dose therapeutic products.
2. Clarify distribution pathways so that hemp beverages with a ratio above 15:1 (non-intoxicating) may be sold in traditional retail outlets (liquor stores, groceries, CBD shops), while beverages below 15:1 (intoxicating) are directed through cannabis dispensaries, creating clear, complementary carve-outs that benefit both sectors and keep consumers safe.
3. Ensure labeling and testing requirements are consistent with other hemp consumables, with clear dosage information for consumers.

By creating uniform standards and distribution rules, the Commission can ensure hemp-derived beverages are safe, accessible, and economically viable, while preventing unnecessary conflicts between liquor distributors, liquor stores, hemp companies, and cannabis licensees.

9. Market Equity and Access (§ 1.11.G Allowable Product Types)

- ⇒ According to Commission data, THC pre-rolls and vape cartridges are the second and third highest-selling product categories in Rhode Island's cannabis market, after flower, generating approximately \$18 million and \$15 million in year-to-date sales.
- ⇒ Yet, hemp and CBD licensees are prohibited from producing or selling these same product types in non-intoxicating forms.
- ⇒ Pre-rolls are off-limits because they are misclassified as tobacco products, and vape cartridges are effectively banned due to unclear and overly restrictive THC limits.
- ⇒ This regulatory divide prevents hemp farms and manufacturers from participating in the state's most in-demand product categories (a \$33 million market) despite being fully licensed, inspected, and compliant under the state hemp program.

Recommendation: Create clear pathways for hemp licensees to produce and sell non-intoxicating pre-rolls and vape cartridges that meet federally compliant THC limits. Clarify that hemp pre-rolls and vape carts are not tobacco products. Establish clear, science-based THC thresholds that align with other hemp-derived consumables. Ensure hemp licensees have equitable access to product types that are already legal and regulated under the same Commission framework. This approach would support local farms, expand consumer choice, and strengthen Rhode Island's cannabis supply chain by keeping all cannabis-derived commerce (both intoxicating and non-intoxicating) safely within the state's regulated market.

10. Synthetic Cannabinoids in Product Prohibitions (§ 1.11.H.1.c - Product Prohibitions)

- ⇒ The proposed rule prohibits hemp-derived CBD products from being combined with "synthetic cannabinoids," but does not define the term.
- ⇒ Without a clear definition, naturally occurring cannabinoids such as CBG and CBN isolates risk being misclassified as synthetic, even when derived from hemp.

- ⇒ This ambiguity could create unnecessary compliance issues for vendors and limit consumer access to safe, well-documented hemp-derived products.

Recommendation: Define “synthetic cannabinoids” as compounds not naturally occurring in the cannabis plant and produced solely through artificial chemical synthesis. Clarify that hemp-derived isolates of naturally occurring cannabinoids (CBD, CBG, CBN, CBC, etc.) are permitted in hemp-derived consumable products. Perhaps include a distinction between intoxicating cannabinoids, and non-intoxicating cannabinoids.

11. CBD Consumable Storage Location (§ 1.11.K.3 - Retail Sales)

- ⇒ The current regulatory language regarding the placement of CBD consumables is unclear, creating confusion among vendors.
- ⇒ As written, the requirement for a “separate location” could be interpreted to mean that CBD products must be stored or displayed in an entirely off-site location, which is impractical and unnecessary.
- ⇒ This lack of clarity can lead to inconsistent enforcement and uncertainty for small retailers who want to remain compliant.

Recommendation: Clarify that “separate location” may mean a distinct shelf, cabinet, or room on the same premises, provided products are clearly labeled and separated from non-CBD items. This will ensure consistent application while remaining practical for retailers.

12. Hemp Extraction with Cannabis Cultivator License (§ 1.12 - Methods of Extraction)

- ⇒ Currently, no licensed extraction facilities exist in Rhode Island for hemp farms, with the nearest option located in Lewiston, Maine.
- ⇒ Hemp farmers rely on local extraction facilities with proper quality control and services to turn crops into safe, market-ready products.
- ⇒ Without accessible in-state extraction, hemp crops risk sitting in storage and deteriorating in quality, creating unnecessary losses for small farms. This can also increase testing requirements.

Recommendation: Explicitly allow licensed THC-rich cannabis cultivators to process and extract hemp under their existing cannabis license, without requiring them to obtain an additional license for \$2,500. This would reduce redundancy, expand access to extraction, and strengthen Rhode Island’s local supply chain, all while keeping processing work in-state.

13. Institute of Higher Education Protections (§ 1.14 Institutes of Higher Education)

- ⇒ This section has been part of Rhode Island’s hemp program since before the 2018 Farm Bill, yet no institution has been able to act as a designated state research facility.

- ⇒ Johnson & Wales University (JWU), which launched pioneering Bachelor of Science cannabis degree programs, has since canceled those programs, citing concerns about jeopardizing federal funding.
- ⇒ Without explicit state-level protections, universities remain unwilling to take on cannabis research, leaving this provision effectively useless despite its importance to the state's research and workforce development goals.

Recommendation: Add explicit protections for institutions of higher education to ensure they are not penalized under state law or regulation for participating in cannabis or hemp research. Rhode Island should signal strong support for cannabis science and education by shielding its universities from risk, thereby encouraging research partnerships and restoring academic leadership in this field.

Finally, I want to emphasize that my door is always open. As someone who has been part of this industry from its inception in Rhode Island, it is imperative that the experiences of farmers and small businesses are heard and respected as the Commission builds the future of hemp regulation. Although the period for requesting a mandatory hearing has passed, I respectfully urge the Commission to voluntarily hold an oral hearing given the significance of these rules. Hearing from farmers, retailers, distributors, and consumers will help ensure a fair, effective, science-based final framework. Thanks for your time and attention to this matter.

Best,

Casey Sturts
Director of Sales, Lovewell Farms

From: [Justin and Joe Tierno](#)
To: [Inquiry, CCC](#)
Subject: Proposed Rule 560-RICR-10-20-1 Rhode Island Industrial Hemp Program
Date: Monday, October 20, 2025 2:16:03 PM

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Date: October 20, 2025

Dear Chair Ahern and Members of the Rhode Island Cannabis Control Commission,

Thank you for the opportunity to submit comments on the proposed rules for Rhode Island's Industrial Hemp Program. As a dual grower/handler and CBD realtor, I want to express both support for consumer protections and concern that several of the proposed rules, as written, will negatively impact farmers, small businesses, and consumers in our state. The current draft creates confusion and unnecessary costs in areas that could be addressed with science-based, farmer-friendly rules. Specifically:

- Post-harvest testing is not required under federal law and risks putting outdoor farms out of compliance. Previously, 1% Total THC was allowed under state regulations.
- THC limits (1 mg per serving, 5 mg per package) are stricter than states in the region. By having 100mg per package and 5mg per serving, consumers would be able to achieve their dosage without having to consume as many products that could cause health concerns (i.e. extra sugar).
- Hemp pre-rolls and vape products should not be classified as tobacco, since they are cannabis products, not cigarettes. THC pre-rolls and vape cartridges are the second-and third-best-selling product categories in Rhode Island, generating roughly \$33 million in year-to-date sales. Yet hemp licensees are prohibited from producing comparable non-intoxicating versions, excluding small farms and manufacturers from a major segment of the state's cannabis economy.
- Hemp-derived beverages also hold benefits for the consumer and these products should not be pulled off the shelf. These are hemp products and should not be taken away from industrial hemp license holders.

Rhode Island has the chance to build a program that protects consumers while supporting farmers and businesses across the supply chain. To do this, the Commission should align hemp regulations with federal law and regional leaders like New York and Maine, which have adopted evidence-based frameworks that support both safety and economic growth. I respectfully urge the Commission to revise the proposed regulations to remove unnecessary barriers, adopt clear product standards, and ensure fairness for all stakeholders. With these adjustments, the program will better serve Rhode Island's farmers, retailers, distributors, and consumers. Although the period for requesting a mandatory hearing has passed, we urge the Commission

to voluntarily hold an oral hearing due to the significance and statewide impact of these proposed regulations. This would allow farmers, retailers, distributors, and consumers to share experience and help the Commission craft rules that are fair, effective, and science-based.

Sincerely,
Joe and Justin Tierno
Releaf Center

October 15, 2025

Kim Ahern
Chairperson
Rhode Island Cannabis Control Commission
Industrial Hemp Program
560 Jefferson Boulevard
Warwick, Rhode Island 02886
USA

Delivered by Email
DBR.HempCompliance@dbr.ri.gov

Dear Chair Ahern:

RE: Ensuring Safe Industrial Hemp Products

A safe and effective regulatory framework that protects the health and wellbeing of production employees, consumers, livestock, international customers, and the environment is important to the success of the American industrial hemp (hemp) industry. North America is an integrated marketplace, and a consistent, responsible regulatory approach is key for those producing products and to customers.

The following regulatory recommendations were developed to assist state agriculture, food, natural health and non-prescription drug, hemp, and cannabis regulators create consistent regulatory structures for industrial hemp that address safety, but do not restrict industry growth and consumer access.

The Canadian Hemp Trade Alliance (CHTA) provides the attached information from an industry that has focused on hempseed-derived food, feed, and fiber products over the past 27 years. CHTA works closely with global research agencies, and hemp food processing companies to provide wholesome and nutritious products for human and animal consumption.

CHTA strongly encourages all state regulators to exempt industrial hempseed (hemp seed or grain), stalks and branches, roots, and all food, feed, fibre, natural health, and non-prescription drug products derived from these plant tissues from regulations targeting high-THC cannabis (marijuana) and products containing concentrated, isolated, or semi-synthetic phytocannabinoids extracted from *Cannabis sativa* L. (high-THC cannabis and industrial hemp) plant. CHTA endorses regulation of phytocannabinoid extraction from industrial hemp and high-THC cannabis (i.e. marijuana) flowers as high-THC Cannabis (marijuana).

We invite further collaboration and request that you circulate the following material to related agencies. Further queries or comments are welcomed by contacting the CHTA Hemp Standards Committee (Tel: 825-413-5749 Email: standards@hemptrade.ca).

Yours truly,



Ted Haney
President & CEO
Canadian Hemp Trade Alliance
Calgary, Alberta, Canada
Cell: 403-819-1647

CC: Clarence Shwaluk, Board Chair, CHTA (cshwaluk@manitobaharvest.com)
Keanan Stone, Vice Board Chair, CHTA (keanan.hunt@gmail.com)
Terry Grajczyk, Standards Consultant, CHTA (standards@hemptrade.ca)

Ensuring Safe Industrial Hemp Products

Introduction

It is important that industrial hemp (hemp) plants in Canada and the USA are subject to regulation of a maximum Δ -9 tetrahydrocannabinol (THC) level in the flowers and upper leaf of the inflorescence (flowering tops). The flowers and leaves of the *Cannabis sativa* L. plant inflorescence (upper flowering top) produce natural phytochemicals which, when concentrated for medical or adult use purposes, are very different from industrial hemp. Thus a distinction between the three industrial sectors – medical cannabis (disease reduction and therapeutics), adult use cannabis (intoxication and recreation), and industrial hemp (food, feed, and fiber) – has enabled many jurisdictions to develop each sector with justifiably separate risk-informed regulations. Such a regulatory framework can enable industry growth and provide access to many nutritive and health products for humans and animals. It is also important that any regulatory framework guards against fraud and unsafe or illegal products being diverted to the food, feed, and phytochemical extraction sectors.

Agricultural hemp has been bred for centuries to contain extremely low levels of THC in the flower and upper leaf. Residual amounts of THC can be distributed to the outer shell of the hempseed, however remain at trace levels and are managed by food processors and fit-for-purpose regulations. Plant breeders manage multi-generational seed lines to develop certified cultivars that ensure regulatory alignment meeting Δ -9 THC thresholds in its flowering tops.

Products containing concentrated or isolated phytocannabinoids, or semi-synthetic or synthetic cannabinoids are not industrial hemp and may be regulated as and co-processed with high-THC cannabis flower products. Thus, the move to differentiate hemp foods and feeds from medical or recreational cannabis products is important.

1. Regulations – Industrial Hemp Farming

Hemp has contributed to a growing agriculture and agri-food sector through farm incomes, sustainability, value added products, human nutrition, and jobs. Most of the hemp produced in Canada and the USA is an outdoor broadacre¹ pollinated agricultural crop that is a viable option within crop rotations due to its contribution to plant pest and weed control, soil health, water quality, and growing demand for food, feed, and industrial fiber products. Outdoor broadacre hemp production can also play a role in climate change mitigation due to its durable, recyclable industrial fiber from the plant's stalks and its use in displacing synthetics in manufactured products.

A minority of hemp (feminized or unpollinated) is an outdoor or indoor horticultural crop. This system produces plants exclusively for inflorescence harvest and phytochemical extraction. No seed is produced when using feminized seed or non-pollinated production systems.

While THC (primarily THC-A) is a natural constituent of the hemp plant's flowers, it is not produced in hempseed. Flowers, leaves, and straw (plant stalk) are separated from the hempseed when broadacre hemp is harvested. Trace levels of THC are therefore present

¹ Broadacre is a term used to describe farms or industries engaged in the production of grains, oilseeds and other crops, or the grazing of livestock for meat or wool, on a large scale (i.e., using extensive parcels of land) Source: [Agricultural Policies in OECD Countries: Monitoring and Evaluation 2000: Glossary of Agricultural Policy Terms, OECD](#)

when processing hempseed due to incidental contact with flower material during harvest. THC and other cannabinoids are present on hempseed, hemp roots, hemp stalks, and hemp flowers (outside of the inflorescence) at very low trace levels that are not commercially recoverable.

Regulatory Recommendations for Industrial Hemp Farming:

- a. Licensing of hemp farmers (cultivators) is not recommended. Hemp farming should be regulated as any other agriculture or horticulture sector (e.g. corn, soybeans, wheat, grapes, and hops). Moving regulatory oversight of hemp production to agriculture authorities – without the requirement for unique licensing – has been supported by the United Nations Conference on Trade and Development (UNCTAD).²

Countries wishing to promote an industrial hemp sector need to consider the reform of existing regulations, to facilitate the exploitation of all parts of the plant. The removal of legislative barriers to industrial hemp cultivation may increase production by farmers. For example, the common practice of having entities related to the control of narcotic drugs issue licences for growing industrial hemp should be reconsidered. A larger scale of production is necessary to reduce the long-term average production costs faced by farmers, as even primary processing operations, such as decortication or seed drying and cleaning, require machinery, the cost of which remains prohibitive for small-scale producers.

If multi-year licensing of hemp cultivators (farmers) is to be considered, such licensing may cover the following activities: buying hempseed for sowing; growing hemp plants; and selling hemp products (i.e. whole hemp plants, hempseed/grain, hemp stalks and branches, hemp roots, and hemp flowers and leaves). Multi-purpose production (e.g. grain-flower, fiber-flower, or grain-fiber-flower) may occur in any cultivation unit;

- b. Criminal background checks are not required for hemp farmers, hempseed processors, and other hempseed handlers (e.g. transporters, cleaners, sellers, and brokers) in jurisdictions that require elevated licensing requirements for phytocannabinoid extraction from hemp flowers that are separate and distinct from all hemp licensing or regulation;
- c. Representative sampling and random testing for total available Δ -9 THC (Δ -9-THC + THC-A x 0.877).³ levels in flowers and leaves of the inflorescence (flowering tops) at physiological maturity (regardless of use) is required where hemp is grown to produce hempseed for sowing (e.g. Breeder, Select, Foundation, Registered, Certified, and non-certified). Testing is generally completed with hempseed breeders and farmers growing hempseed for sowing;
- d. THC pre-harvest testing of commercially-grown hemp plants is not required in jurisdictions where farmers are required to exclusively sow recognized industrial hemp hempseed varieties/cultivars that are certified by globally-recognized seed certification programs ([CSGA](#), [AOSCA](#), or other [OECD Seed Scheme](#) compliant organizations) for the production of: hempseed/grain, stalks and branches, roots, or flowers and leaves; and, have been proven to produce hemp plants with THC levels in the flowers and leaves of the inflorescence at physiological maturity (regardless of use) that are not

² United Nations Conference on Trade and Development, 2023, [Industrial hemp: An old crop in a modern era](#), Policy Brief No. 110.

³ Adjusting the level of acidic precursor THC-A by 0.877 accounts for the absorbable amount remaining after decarboxylation. Decarboxylation requires the significant application of heat. Decarboxylation does not occur in food/feed processing.

higher than the maximum regulated THC levels established by authorities having jurisdiction; and,

- e. Mandatory pre-harvest THC testing of commercial hemp production is required in jurisdictions that do not require the use of certified hempseed for sowing as described in section 1.d. above. Where hempseed for sowing from certified and compliant industrial hemp varieties/cultivars is not regulated, USDA performance-based representative sampling with recognized methodology and standardized protocols is to be implemented by the USDA or state authorities having jurisdiction.

Hemp plants in Canada and the USA are currently regulated to a maximum total available Δ -9 tetrahydrocannabinol (THC) level of not more than 0.3% in the flowers and leaves of the inflorescence. Consideration should be given to moving this level to not more than 1% total available Δ -9 THC, based on the proven safety of hemp at that threshold level produced and processed in other regions of the world (See Appendix, Table 1).

2. Regulations – Hempseed Food, Livestock Feed, and Pet Food Products

a. Hempseed-Derived Food

Food products derived from hempseed are a valuable source of protein, energy, digestible fiber, and a wide array of minerals and vitamins for human nutrition. In addition, when hempseed is mechanically crushed, its oil contains an optimal balance of omega 3-6-9 fatty acids.

Hempseed and its derivatives contain only low natural constituent cannabinoid levels. Intoxicating, toxic, or therapeutic cannabinoid levels can only be found in food products that have been supplemented or adulterated with concentrated, isolated, semi-synthetic, or synthetic cannabinoids. Specific regulatory requirements for phytocannabinoid extraction are required and presented in Section 3 below.

Hempseed-derived ingredients were subject to an extensive USDA Generally Recognized as Safe (GRAS) review in 2018. THC was the only phytocannabinoid identified in an upper threshold and reviewers indicated consumption of hempseed-derived ingredients is not capable of intoxicating consumers. This level was submitted due to an upper limit in Canada of 10 ppm, which has since then been eliminated due to existing controls in plant breeding, licensing of farmers and food processor input controls.

CHTA has developed a set of regulatory recommendations related to hempseed-derived foods, based on peer-reviewed global research and work completed by the Federation of International Hemp Organizations (FIHO).

Regulatory Recommendations for Hempseed-Derived Food:

- i. Food and food ingredients containing hemp ingredients may not contain concentrated or isolated phytocannabinoids, or semi-synthetic or synthetic cannabinoids. Any food product containing concentrated or isolated phytocannabinoids, or semi-synthetic or synthetic cannabinoids is not hemp;
- ii. No maximum total available Δ -9-THC (Δ -9 THC + 0.877 x THC-A) limits are required for hempseed-derived food ingredients if certified hemp cultivars proven to produce plants with total available Δ -9-THC less than the regulated maximum concentration at physiological maturity are exclusively used;
- iii. No maximum total available Δ -9-THC limits are required for foods or food ingredients derived from hemp roots, hemp stalks and branches, or hemp leaves outside of the inflorescence;

- iv. No maximum total available Δ -9-THC limits in foods containing hemp ingredients are required if included hemp-derived ingredients meet the provisions in subsections 2.a.i-iii above;
- v. No upper threshold limit for total available CBD ($\text{CBD} + 0.877 \times \text{CBD-A}$) in hemp food ingredients or foods containing hemp is required, as research indicates natural residual constituent CBD levels in hempseed, hemp roots, hemp stalks and branches, or hemp leaves outside of the inflorescence do not represent risks to human health or wellbeing;
- vi. A maximum total available Δ -9-THC limit of 20 ppm is required for hempseed-derived foods or food ingredients if certified hemp cultivars proven to produce plants with total available Δ -9-THC less than the regulated maximum concentration at physiological maturity are not exclusively used;
- vii. As the natural constituent levels of total available Δ -9-THC, CBD, and other phytocannabinoids are well below concentrations of concern for human health and wellbeing, no cannabinoid warning statements, cannabinoid content, or warning symbols are required on hemp food product packaging sold in wholesale or consumer markets; and,
- viii. As random testing for total available Δ -9-THC will identify adulterated product and requirements to identify all ingredients on food packaging exists, a limit on serving size or age restriction for food products derived from hempseed, hulled/dehulled hempseed, hemp protein, hempseed oil, hemp roots, hemp stalks and branches hemp leaves outside of the inflorescence, and their derivatives is not required.

Food processors produce additional byproducts that may be valuable as ingredients in animal supplements and feed. Hempseed-derived products are low-risk as they contain very low concentrations of natural constituent (i.e. residual) cannabinoids, and provide valued nutritional benefits for livestock and pets. Repurposing hempseed-derived products – rather than diverting them as food waste to landfills – support food processors' economic and environmental position. Thus, recommendations 2b. and 2c. are provided below to utilize product that would otherwise be waste. These products will assist food processor's product flow and represent a significant source of additional revenue which will be important for long-term growth and sustainability.

b. Hempseed-Derived Livestock Feed Ingredients

Since hempseed-derived livestock feed ingredients are not subject to high processing temperatures for a significant period of time, over 90% of the THC and CBD naturally present in livestock feed ingredients is in the precursor THC-A form – thus not readily absorbed in livestock tissues (e.g. meat, milk, and eggs) intended as food.

Hempseed grown from certified and compliant industrial hemp varieties/cultivars produces consistently low levels of Δ -9 THC in the flowering tops. This translates to extremely low/trace levels on the outer hempseed shell – which poses no processing, employee or animal safety concerns for hempseed-derived products.

Regulatory Recommendations for Hempseed-Derived Livestock Feed Products:

- i. Hemp feed ingredients and mixed feeds containing hemp ingredients may not contain concentrated or isolated phytocannabinoids, or semi-synthetic or synthetic cannabinoids. Any product containing concentrated or isolated phytocannabinoids, or semi-synthetic or synthetic cannabinoids is not hemp;
- ii. No maximum total available Δ -9-THC (Δ -9 THC + $0.877 \times \text{THC-A}$) limits are required for hempseed-derived livestock feed ingredients if certified hemp cultivars proven to

produce plants with total available Δ -9-THC less than the regulated maximum concentration at physiological maturity are exclusively used;

- iii. No maximum total available Δ -9-THC limits are required for livestock feed ingredients derived from hemp roots, hemp stalks and branches, or hemp leaves outside of the inflorescence;
- iv. No maximum total available Δ -9-THC limits in livestock feeds containing hemp ingredients are required if included hemp-derived ingredients meet the provisions in subsections 2.b.i-iii above;
- v. A maximum total available Δ -9-THC limit of 100 ppm is required for hempseed-derived livestock feed ingredients if certified hemp cultivars proven to produce plants with total available Δ -9-THC less than the regulated maximum concentration at physiological maturity are not exclusively used;
- vi. A maximum total available Δ -9-THC limit of 100 ppm is required for whole-plant hemp livestock feed ingredients consisting of whole hemp plants (grazing) or ground/shredded whole hemp plants;
- vii. No upper threshold limit for total available CBD ($\text{CBD} + 0.877 \times \text{CBD-A}$) is required, as research indicates natural residual constituent CBD levels in hempseed, hemp roots, hemp stalks and branches, or hemp leaves outside of the inflorescence do not represent risks to human or animal health or wellbeing;
- viii. Demonstration of hemp-derived feed ingredient efficacy (i.e. weight gain, palatability, and tolerance at various inclusion rates) may be provided by the application of animal nutrition science and, where necessary, literature reviews of credible livestock feeding trials completed in any jurisdiction;
- ix. Demonstration of food safety (i.e. cannabinoid concentration, and nutritional profile) of meat, milk, and eggs derived from livestock fed hemp feed ingredients may be provided by literature reviews of credible livestock feeding trials completed in any jurisdiction;
- x. As the natural constituent levels of total available Δ -9-THC, CBD, and other phytocannabinoids are well below concentrations of concern for animal health and wellbeing, no cannabinoid warning statements, cannabinoid content, or warning symbols are required on hemp livestock feed ingredient product packaging sold in wholesale or consumer markets;
- xi. As random testing for total available Δ -9-THC will identify adulterated product and requirements to identify all ingredients on livestock feed packaging exists, a limit on feed inclusion rates for feed products derived from hempseed, hulled/dehulled hempseed, hemp protein, hempseed oil, hemp roots, hemp stalks and branches, hemp leaves outside of the inflorescence, and their derivatives is not required; and,
- xii. Further regulatory provisions for feed ingredients derived from whole hempseed, dehulled/hulled hempseed, hempseed oil, hemp protein, hempseed hulls, hempseed meal (protein cake), hempseed screenings, and hempseed fines without added cannabinoids are not required.

c. Hempseed-Derived Non-Food-Animal Feed Ingredients

Since hempseed-derived pet food ingredients are not subject to high processing temperatures for a significant time period, over 90% of the THC naturally present in pet food ingredients is in the precursor THC-A form – thus not readily absorbed.

Hempseed grown from certified and compliant industrial hemp varieties/cultivars produces consistently low levels of Δ -9 THC in the flowering tops. This translates to

extremely low/trace levels on the outer hempseed shell – which poses no processing, employee or animal safety concerns for hempseed-derived products

Regulatory Recommendations for Non-Food Animal Hemp Feed Products:

- i. Non-Food Animal feed ingredients derived from hempseed including mixed feeds and nutritional supplements containing hemp ingredients may not contain concentrated or isolated phytocannabinoids, or semi-synthetic or synthetic cannabinoids. Any product containing concentrated or isolated phytocannabinoids, or semi-synthetic or synthetic cannabinoids is not hemp;
- ii. No maximum total available Δ -9-THC (Δ -9 THC + $0.877 \times$ THC-A) limits are required for non-food animal feed ingredients derived from hemp if certified hemp cultivars proven to produce plants with total available Δ -9-THC no more than the regulated maximum concentration at physiological maturity are exclusively used;
- iii. No maximum total available Δ -9-THC limits are required for non-food animal feed ingredients derived from hemp roots, hemp stalks and branches, or hemp leaves outside of the inflorescence;
- iv. No maximum total available Δ -9-THC limits in hempseed derived non-food animal feeds are required if included ingredients meet the provisions in subsections 2.c.i-iii above;
- v. A maximum total available Δ -9-THC limit of 100 ppm is required for hempseed-derived non-food animal feed ingredients if certified hemp cultivars proven to produce plants with total available Δ -9-THC less than the regulated maximum concentration at physiological maturity are not exclusively used;
- vi. A maximum total available Δ -9-THC limit of 100 ppm is required for non-food animal food/feed ingredients consisting of whole hemp plants (grazing) or ground/shredded whole hemp plants;
- vii. No upper threshold limit for total available CBD ($\text{CBD} + 0.877 \times \text{CBD-A}$) is required, as research indicates natural residual constituent CBD levels in hempseed, hemp roots, hemp stalks and branches, or hemp leaves outside of the inflorescence do not represent risks to human or animal health or wellbeing;
- viii. Demonstration of hempseed-derived feed ingredient efficacy (i.e. nutritional profile and feeding rates) may be provided by the application of animal nutrition science and, where necessary, literature reviews of credible feeding trials completed in any jurisdiction;
- ix. As the natural constituent levels of total available Δ -9-THC, CBD, and other phytocannabinoids are well below concentrations of concern for animal health and wellbeing, no cannabinoid warning statements, cannabinoid content, or warning symbols are required on hemp feed ingredient product packaging sold for non-food animals in wholesale or consumer markets;
- x. As random testing for total available Δ -9-THC will identify adulterated product and requirements to identify all ingredients on feed packaging for non-food animals exists, further limits on hempseed-derived products, hemp roots, leaves outside of the inflorescence or hemp stalks are not required. See section 4 for targeted cannabinoid products intended for pets or companion animals; and,
- xi. Further regulatory provisions for feed ingredients for non-food animals derived from whole hempseed, dehulled/hulled hempseed, hempseed oil, hemp protein, hempseed hulls, hempseed meal (protein cake), hempseed screenings, and hempseed fines without added cannabinoids are not required.

3. Regulations – Hemp Flowers and Leaves of the Inflorescence

Hemp flowers are contained in the inflorescence (flowering tops) of the hemp plant. Hemp flowers and leaves of the inflorescence, whether fresh or dried, contain higher concentrations of cannabinoids than other hemp plant tissues. Maximum total available Δ -9-THC concentration limits in the flowers and leaves of the inflorescence are established by authorities having jurisdiction, and are currently set at 0.3% (3,000 ppm) by national regulators in both Canada (Health Canada) and the USA (United States Department of Agriculture).

The majority of horticultural hemp grown for cannabinoid extraction is not pollinated. This allows the plant to increase resin production by focusing its energy on the trichome glands in flowers and leaves contained within the inflorescence. Unpollinated hemp plants do not produce hempseed.

Regulatory Recommendations for Hemp Flowers and Leaves of the Inflorescence:

- a. Hemp flowers and leaves of the inflorescence, when separated from the hemp plant and not having cannabinoids extracted, may be considered for sale in the consumer market as natural health product and non-prescription drug ingredients. Such products shall not contain concentrated, isolated, semi-synthetic, or synthetic cannabinoids. Disease reduction or therapeutic claims must be verified through credible peer-reviewed research;
- b. Hemp flowers and leaves of the inflorescence, when separated from the hemp plant and not having cannabinoids extracted, may be considered for sale in the consumer market as an infusion product (tea). Such products shall not contain concentrated, isolated, semi-synthetic, or synthetic cannabinoids;
- c. Hemp flowers and leaves of the inflorescence, when separated from the hemp plant and not having cannabinoids extracted, and prepared for inhalation are no longer a hemp product. Such products must be regulated uniquely in a manner aligned with tobacco products, and natural health and non-prescription drug products; and,
- d. Hemp flowers and leaves of the inflorescence, when separated from the hemp plant and not having cannabinoids extracted, are not recommended as a livestock feed ingredient or a feed/ ingredient for non-food animals until further safety research is available.

4. Regulations – Phytocannabinoid Extraction and Phytochemical Processing

Phytocannabinoids may be extracted, concentrated, isolated, or chemically altered (semi-synthesized) through post farmgate manufacturing processes. Extracted, concentrated, and isolated phytocannabinoids are not hemp products⁴ and may represent risks not associated with the hemp plant or processed hempseed products. Semi-synthesized and synthesized cannabinoids may include cannabinoid isomers that are intoxicating and/or contaminants that are harmful to humans or animals.

Food and livestock feed ingredients derived from hemp roots, hemp stalks, or hempseed can be rendered unsafe if supplemented with or adulterated by concentrated or isolated phytocannabinoids, chemically altered phytocannabinoids, or synthesized cannabinoids. Products containing concentrated or isolated phytocannabinoids, or semi-synthetic or synthetic cannabinoids are not hemp – and should be regulated separately as medical or adult use/recreational cannabis, natural health products, non-prescription drugs. Those

⁴ Hemp plant components from primary production may be hemp products, but if additives or processing changes occur, they are not known as hemp in most countries. This assists management of fraudulent or illegal product in post-farm manufacturing.

sectors have unique value chains, regulatory systems, and customers that are separate and distinct from industrial hemp.

Notwithstanding the above, the World Health Organization's Expert Committee on Drug Dependence (ECDD) determined that the safe threshold for Δ -9-THC in unregulated tinctures is 1,500 ppm (1.5%). As the ECDD noted that member states may have difficulty measuring Δ -9-THC concentrations less than 2,000 ppm (2.0%), they recommended that:

A footnote be added to Schedule I of the 1961 Single Convention on Narcotic Drugs to read: "Preparations containing predominantly cannabidiol and not more than 0.2 per cent [2,000 ppm] of delta-9-tetrahydrocannabinol are not under international control."⁵

Regulatory Recommendations for Cannabinoid Extraction and Phytochemical Processing:

- a. Separate and unique regulatory actions are required to appropriately address intoxication, addiction, habituation, therapeutic potential, toxicity, and contamination risks associated with the extraction, concentration, isolation, and chemical alteration of hemp-flower-derived phytocannabinoids;
- b. Such regulation should include risk-based approaches that consider consumer age, cannabinoid concentration, and daily dose limits to address safety concerns for natural health and non-prescription drugs (e.g. supplements), inhalation products (e.g. dried flowers and vapes), topical products (transdermal and emollients), oral products (supplemented foods and beverages), sublingual products, and other dosage mechanisms;
- c. Research licenses should be made available to study concentrated and isolated phytocannabinoids and semi-synthesized and synthesized cannabinoids that may provide beneficial factors to positively and safely influence health outcomes in humans and animals;
- d. Regulatory exemptions for "Low-THC cannabis" products that do not contain semi-synthetic or synthetic cannabinoids may be considered to allow sale of safe food products containing extracted (concentrated or isolated) phytocannabinoids in the consumer market. Based on the ECDD finding that the minimum intoxicating Δ -9-THC dose is 1.5 mg, the following maximum Δ -9-THC concentrations of eligible low-THC tinctures, supplemented foods, and supplemented beverages are recommended:
 - i. Tinctures – 750 ppm – 2 servings x 1 ml/serving = 2 ml consumption x 750 μ g/mg (750 ppm) THC = 1,500 μ g THC = 1.5 mg THC consumed;
 - ii. Supplemented Foods – 15 ppm – 2 servings x 50 grams/serving = 100 grams consumption x 15 μ g/mg = 1,500 μ g THC = 1.5 mg THC consumed;
 - iii. Supplemented Beverages – 2 ppm – 2 servings x 350 ml/serving = 700 ml consumption = 700 mg consumption x 2 μ g/mg (2 ppm) THC = 1,400 μ g THC = 1.4 mg THC consumed;
 - iv. Companion dogs – CBD administered at between 0.2-2mg/kg orally twice daily.⁶ If administering to assist managing osteoarthritis, pet owners should consult a veterinarian for use instructions prior to administering CBD; and,

⁵ WHO Expert Committee on Drug Dependence, 2019, [Forty-first report WHO Technical Report Series, No. 1018](#), Section 7.5 Cannabidiol preparations (pp. 53-54), ISBN 978-92-4-121027-0 (68 pages)

⁶ Health Canada, 2022, [Review of cannabidiol: Report of the Science Advisory Committee on Health Products Containing Cannabis](#), Recommendation G, ISBN 978-0-660-43616-6

- v. Further advisement on targeted use of phytocannabinoids to companion animals to become available as objective, peer-reviewed research becomes available; and,
- e. The distribution and sale of safe products containing non-phytocannabinoid compounds (e.g. terpenes, flavonoids, sterols, fatty acids, polysaccharides, and polyphenols) in the consumer market without specific industrial hemp or high-THC (marijuana) licensing or regulation. These compounds are found and produced from a wide range of agriculture and horticulture crops. Existing food, supplements, and non-prescription drug regulations – as applied to products produced from other plants – exist and should be used to regulate non-phytocannabinoid products extracted from industrial hemp or high-THC cannabis flowers.

5. Regulations – Post-Extraction Cannabinoid Biomass

Hemp flowers and leaves of the inflorescence can be processed to extract phytocannabinoids, terpenes, flavonoids, phenolics, and other bio-active compounds. Regardless of the solvent extraction (e.g. alcohol, hexane, critical CO₂, and water) or solventless extraction (e.g. ultrasonic, microwave, hydrodynamic cavitation, heat, and microwave) technology used, the post-extraction biomass represents a valuable livestock and pet feed ingredient.

Regulatory Recommendations for Post-Extraction Cannabinoid Biomass

- a. Where a solvent extraction technology is used, solvent residues must be no higher than allowable solvent residues in other livestock feed ingredients (e.g. avocado meal, canola meal, coconut meal, corn meal, cottonseed meal, olive meal, peanut meal, safflower meal, soybean meal, or sunflower meal);
- b. A maximum total available Δ -9-THC (Δ -9 THC + 0.877 x THC-A) limit of 100 ppm is required for post-extraction cannabinoid biomass livestock feed ingredients and non-food animal feed ingredients (excluding dogs and cats); and,
- c. No upper threshold limit for total available CBD (CBD + 0.877 x CBD-A) is required for post-extraction cannabinoid biomass livestock feed ingredients and non-food animal food/feed ingredients.

APPENDIX

References

1. USDA *Generally Recognized as Safe (GRAS)* reviews of dehulled hempseed , hempseed protein, and hempseed oil in 2018. These reviews confirmed food safety for hempseed products:
 - a. [Agency Response Letter GRAS Notice No. GRN 000765](#)
 - b. [Agency Response Letter GRAS Notice No. GRN 000771](#)
 - c. [Agency Response Letter GRAS Notice No. GRN 000778](#)
2. AOSCA, Association of Official Seed Certifying Agencies is a trade organization with standards on production, identification, distribution and promotion of certified classes of seed and other crop propagation materials. Founded in 1919 it is based in Moline, Illinois USA with member agencies across the world (www.aosca.org).
3. CSGA, Canadian Seed Growers Association is an industry association that delivers an inclusive and transparent national seed crop certification. It's standards system advances collaboration and innovation while upholding quality, trust, and excellence in seed production for the benefit of Canadian agriculture (<https://seedgrowers.ca/>).
4. OECD, Organization for Economic Co-operation and Development, is an intergovernmental organization with standards for agricultural seed quality. Many commonwealth and European countries base seed certification on OECD standards, similar to AOSCA standards with equivalent outcomes. Founded in 1948 it is headquartered in Paris France with major offices in Berlin, Mexico City, Tokyo and Washington DC
<https://www.oecd.org/agriculture/seeds/>).
5. World Health Organization's Expert Committee on Drug Dependence (ECDD) expert reviews:
 - a. [ECDD – 34th Session Report 942](#) – Dronabinol Critical Review (2.1.1) Recommendation to Schedule III
 - b. [ECDD – 39th Session Report 1009](#) – Cannabidiol (5.15) and Pre-Review Update (6) (2017-11)
 - i. [ECDD – 39th Session - Cannabidiol \(CBD\) Pre-Review Report - Agenda Item 5.2](#) (2017-11).
 - c. [WHO ECDD 40th Session Report 1013](#) - Cannabidiol (6), Cannabis and cannabis resin (7), and Extracts and tinctures of cannabis (8). Section 6 – Cannabidiol (pp 13-17) (2018-06).
 - i. [ECDD – 40th Session - Critical Review – Cannabinol \(CBD\) Report](#) (2018-06).
 - d. [ECDD – 41st Session Report 1018](#), Cannabis and cannabis-related substances (Section 7), ISBN 978-92-4-121027-0
 - i. [ECDD – WHO ECDD 41st Session – Critical Review – Extracts and Tinctures of Cannabis](#) (2018-11)
 - ii. [ECDD – 41st Session – Critical Review – Cannabis and cannabis resin](#) (2018-11)
 - iii. [ECDD 41st Session – Critical Review – Delta-9-tetrahydrocannabinol](#) (2018-11)
 - iv. [WHO ECDD 41st Session – Critical Review – Isomers of THC](#)

Table 1: Global THC and CBD Threshold Levels in Hemp Food Products				
Jurisdiction	Maximum Δ -9 THC Limit			Maximum CBD Limit
	Hemp Plant Definition	Hempseed for Food	Hempseed Oil for Food	Hempseed for Food
Switzerland	1.0%	10 ppm	20 ppm	No maximum threshold
Australia	1.0%	5 ppm	10 ppm	75 ppm
New Zealand	1.0%	5 ppm; 0.2 ppm(beverages)	10 ppm	75 ppm
European Union	0.3%	3 ppm +50% variance	7.5 ppm + 50% variance	No maximum threshold
Canada	0.3% (0.5% compliance)	No maximum threshold	No maximum threshold	No maximum threshold
United States	0.3 % (0.5% compliance)	10 ppm (GRAS)	10 ppm (GRAS)	No maximum threshold
Hemp Plant Definition: Total available Δ -9 THC (Δ -9 THC + 0.877 x THC-A) in flowering tops				

Table 2: Hempseed product standards – THC and CBD Upper Thresholds				
Agency	Comments	THC in hemp food products	THC in hempseed oil	CBD in hemp food products
ASTM Standards International D8440 ¹	Consensus Standard	Total Δ -9 THC of 20 ppm	Total Δ -9 THC of 20 ppm	No maximum threshold
USA GRAS 2018 Notices GRN 771, GRN 778, GRN 765	Significant assessment of potential human toxicity	Total Δ -9 THC of 10 ppm (dehulled hempseed, hempseed protein)	Total Δ -9 THC of 10 ppm	No maximum threshold
Food Chemicals Codex , USA ²	Consensus standard / monograph	Total Δ -9 THC of 10 ppm	Total Δ -9 THC of 10 ppm	Total CBD of not more than 75 ppm. Purpose: identify non- adulterated product
Source: standard setting bodies, and national regulatory agencies				
Notes:				
1. D8440 Specification for Food Safety and Quality of Hempseed Protein Products Intended for Human Consumption (2022) available at www.astm.org The standard identifies thresholds for food safety and quality in hempseed and its byproducts. ASTM International, 100 Barr Harbor Drive, PO Box C700, West Conshohocken, PA USA				
2. Food Chemicals Codex (USA) 2021 food identity monographs for hempseed oil and hempseed protein are available at https://www.foodchemicalscodex.org/ US Pharmacopeia,12601 Twinbrook Parkway, Rockville, MD USA				

