



# Vermont Cannabis Control Board

December 20, 2023  
Board Meeting  
Executive Director Report

# Public Engagement

## **PRIOR MONTH**

- 8am 12/7 – [Medical Program Study Committee Meeting 4 of 4](#)
- 10am 12/13 – [Pre- Qualification Networking Event](#)

## **UPCOMING**

- 10am 12/29 – Lab Testing Requirements Networking event

# New Guidance Documents

## Lab Testing Action Limits and Parameters

## Lab Testing Requirements Summary



**LABORATORY TESTING ACTION LIMITS  
AND PARAMETERS GUIDANCE:  
WATER ACTIVITY  
PATHOGENS  
PESTICIDES  
TERPENES  
HEAVY METALS  
RESIDUAL SOLVENTS**

**DECEMBER 2023**

JAMES PEPPER, CHAIR  
JULIE HULBURD, COMMISSIONER  
KYLE HARRIS, COMMISSIONER  
BRYNN HARE, EXECUTIVE DIRECTOR

**CANNABIS TESTING REQUIREMENTS**  
CCB RULE 2.9.1

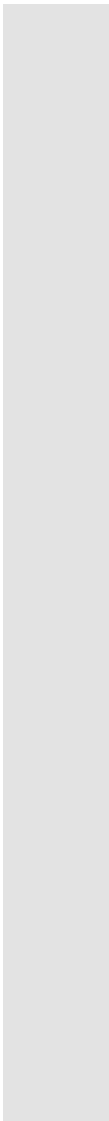
CANNABIS FLOWER	SOLVENT-EXTRACTED CONCENTRATES	TOPICAL PRODUCTS	MECHANICALLY EXTRACTED CONCENTRATES	CONSUMABLE PRODUCTS AND TINCTURES
<p><b>SMOKEABLE:</b></p> <ul style="list-style-type: none"> <li>• Potency</li> <li>• Pathogens</li> <li>• Pesticides</li> <li>• Water Activity</li> </ul> <p>Soil must be tested for heavy metals every three years.</p>	<p><b>FRESH FROZEN BIOMASS:</b></p> <ul style="list-style-type: none"> <li>• Pathogens</li> <li>• Pesticides</li> </ul>	<ul style="list-style-type: none"> <li>• Potency</li> </ul>	<ul style="list-style-type: none"> <li>• Terpene Testing *</li> <li>• Potency</li> <li>• Pathogens</li> </ul> <p>Pesticide and pathogen COAs on the underlying harvest lots must accompany extracts through supply chain. See Board Rule 2.9.1(b).</p>	<ul style="list-style-type: none"> <li>• Potency</li> <li>• Consistency Testing</li> </ul>
<p>Individual cultivars must be submitted separately for all lab tests.</p> <p>For pesticide testing only, licensees may opt to test up to five cultivar samples per harvest lot together, provided that samples must be submitted to the testing lab individually for the lab to co-mingle. See Board Rule 2.9.1(a).</p>	<p>For all Cannabis Products: Certificates of Analysis (COAs) from flower used to produce the cannabis product must follow the product through the manufacturing chain.</p> <p>This will be completed through inventory tracking - please upload the flower COA to the product transfer form when completing required inventory tracking.</p>	<p>*Terpene testing only required for products intended for inhalation or vaporization. See link to full <a href="#">Lab Testing Guidance</a> for details.</p>	<p>Intra-batch consistency testing (beginning, middle, and end) must be completed for manufacturers on the following schedule, based on license tier:</p> <ul style="list-style-type: none"> <li>• Tier 1: Every 6 months per product</li> <li>• Tier 2: Every 3 months per product</li> <li>• Tier 3: Every month per product</li> </ul>	

Aspergillus positive flower may be remediated. See link to full [Lab Testing Guidance](#) See [Rule 2.1.3\(g\)](#) for definition of Harvest Lot



# Adult-Use Program Licensing Data

Data as of  
12/11/23



# ADULT USE PROGRAM

Number of issued cultivation licenses by type and tier

License Type	Issued	
Indoor Cultivator Tier 1	99	<b>120 indoor licenses</b>
Indoor Cultivator Tier 2	12	
Indoor Cultivator Tier 3	8	
Indoor Cultivation Tier 4	0	
Indoor Cultivator Tier 5	1	
Mixed Cultivator Tier 1	97	<b>119 mixed licenses</b>
Mixed Cultivator Tier 2	16	
Mixed Cultivator Tier 3	3	
Mixed Cultivator Tier 4	0	
Mixed Cultivator Tier 5	3	
Outdoor Cultivator Tier 1	110	<b>150 outdoor licenses</b>
Outdoor Cultivator Tier 2	24	
Outdoor Cultivator Tier 3	8	
Outdoor Cultivator Tier 4	3	
Outdoor Cultivator Tier 5	5	

# ADULT USE PROGRAM

Number of issued manufacturer licenses by tier

License Type	Issued
Manufacturer Tier 1	10
Manufacturer Tier 2	56
Manufacturer Tier 3	10

# ADULT USE PROGRAM

Number of issued other licenses by type

License Type	Issued
Retailers	72
Testing Labs	2
Wholesalers	8
Integrated	3

# ADULT USE PROGRAM

Number of cultivation renewals by type and tier

License Type	Renewals issued
Indoor Cultivator Tier 1	22
Indoor Cultivator Tier 2	2
Indoor Cultivator Tier 3	1
Mixed Cultivator Tier 1	21
Mixed Cultivator Tier 2	4
Mixed Cultivator Tier 3	4
Mixed Cultivator Tier 4	1
Outdoor Cultivator Tier 1	41
Outdoor Cultivator Tier 2	4
Outdoor Cultivator Tier 3	5
Outdoor Cultivator Tier 4	2



# ADULT USE PROGRAM

Number of other renewals by type and tier

License Type	Renewals Issued
Retailers	5
Testing Labs	0
Wholesalers	2
Integrated	2
Manufacturers Tier 2	4
Manufacturers Tier 3	1

# ADULT USE PROGRAM

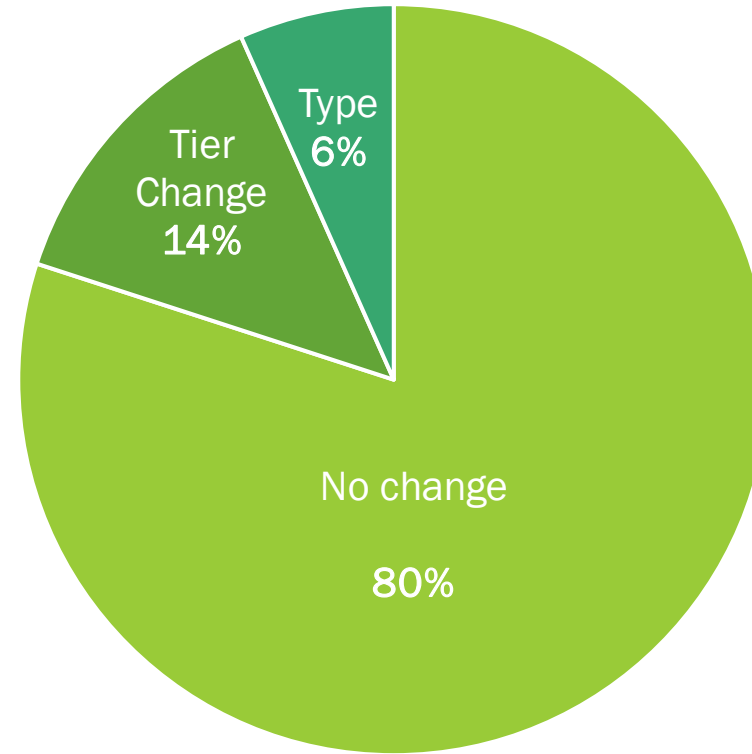
Renewal applications in process

Pending	Applying For
23	Indoor Cultivator Tier 1
7	Indoor Cultivator Tier 2
5	Indoor Cultivator Tier 3
22	Mixed Cultivator Tier 1
7	Mixed Cultivator Tier 2
2	Mixed Cultivator Tier 3
1	Mixed Cultivator Tier 5
1	Integrated
2	Manufacturers Tier 1
12	Manufacturers Tier 2
2	Manufacturers Tier 3
30	Outdoor Cultivator Tier 1
6	Outdoor Cultivator Tier 2
1	Outdoor Cultivator Tier 3
2	Outdoor Cultivator Tier 5
28	Retail
2	Testing Labs
3	Wholesale
<b>156</b>	<b>TOTAL</b>

# ADULT USE PROGRAM

Issued renewals:  
cultivators and  
manufacturers

## Renewal Changes by Type and Tier

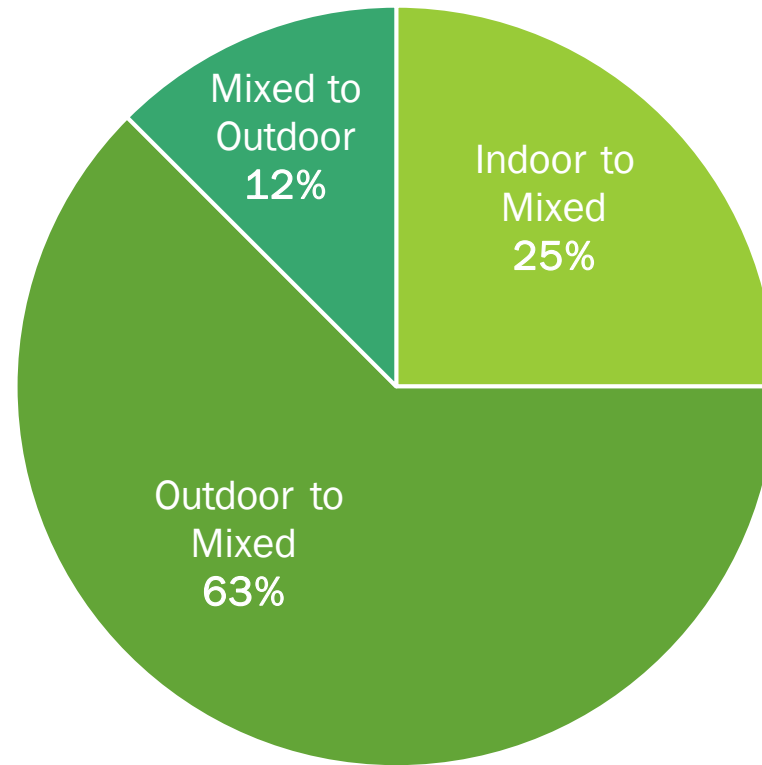


■ No change   ■ Tier Change   ■ Type Change

# ADULT USE PROGRAM

Issued renewals: cultivators and manufacturers

## License Type Change Upon Renewal

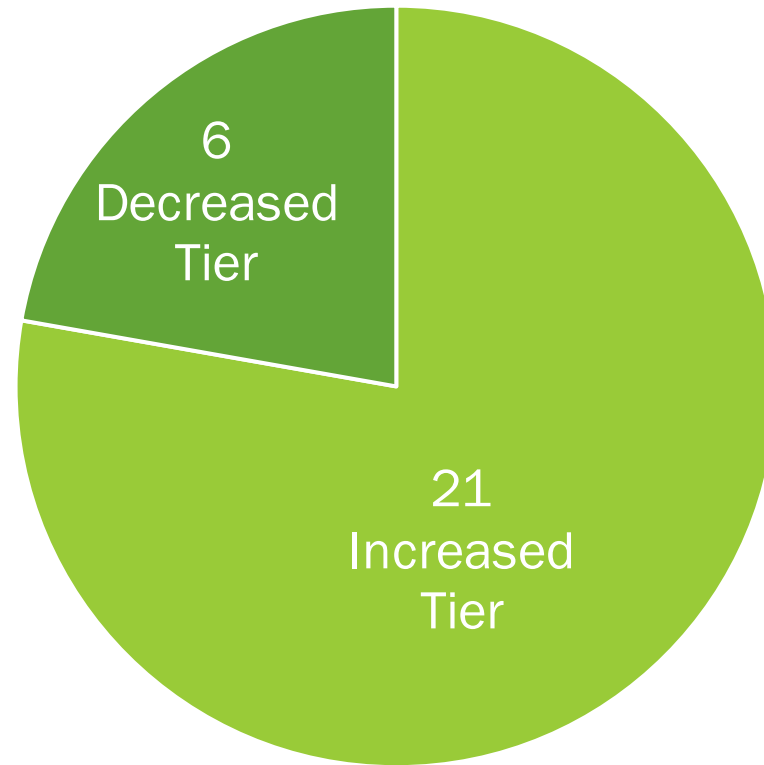


- Indoor to Mixed
- Outdoor to Mixed
- Mixed to Outdoor

# ADULT USE PROGRAM

Issued renewals:  
cultivators and  
manufacturers

## License Tier Change Upon Renewal



■ Increased Tier Size    ■ Decreased Tier Size

# ADULT USE PROGRAM

Retail locations: areas of density (2 or more locations)

	Licensed Retailers (and Integrated)	Retail initial applications in the queue
Barre	1	1
Barton	2	
Bennington	2	
Brandon	3	
Brattleboro/ West Brattleboro	3	
Burlington	10	3
Derby	3	
Essex/Essex Junction	2	1
Fair Haven	2	

# ADULT USE PROGRAM

Retail locations: areas of density with 2 or more locations

	Licensed Retailers (and Integrated)	Retail initial applications in the queue
Manchester Center	1	1
Montpelier	3	
Morrisville	4	
Rutland	3	2
St. Albans/ St. Albans City	2	
St. Johnsbury/ St. Johnsbury Ctr.	2	
Waitsfield	2	
Waterbury/ Waterbury Center	3	
White River/ White River Junction	2	1
Windsor	2	
Wilmington	2	

# ADULT USE PROGRAM

Licensees confirmed not renewing as of 12/18/23

License Type	Priority Status	Total
Outdoor Tier 1	Standard	9
Outdoor Tier 1	Economic Empowerment	4
Outdoor Tier 2	Standard	2
Outdoor Tier 3	Standard	2
Outdoor Tier 4	Standard	1
Indoor Tier 1	Standard	4
Indoor Tier 1	Social Equity	1
Indoor Tier 1	Economic Empowerment	2
Indoor Tier 2	Social Equity	1
Indoor Tier 2	Standard	1
Mixed Tier 1	Standard	2
Mixed Tier 1	Economic Empowerment	1
Mixed Tier 1	Social Equity	1



# ADULT USE PROGRAM

Licensees confirmed not renewing as of 12/18/23

License Type	Priority Status	Total
Wholesalers	Standard	2
Manufacturers Tier 1	Social Equity	2
Manufacturers Tier 2	Economic Empowerment	1
<b>Total</b>		<b>36</b>

# ADULT USE PROGRAM

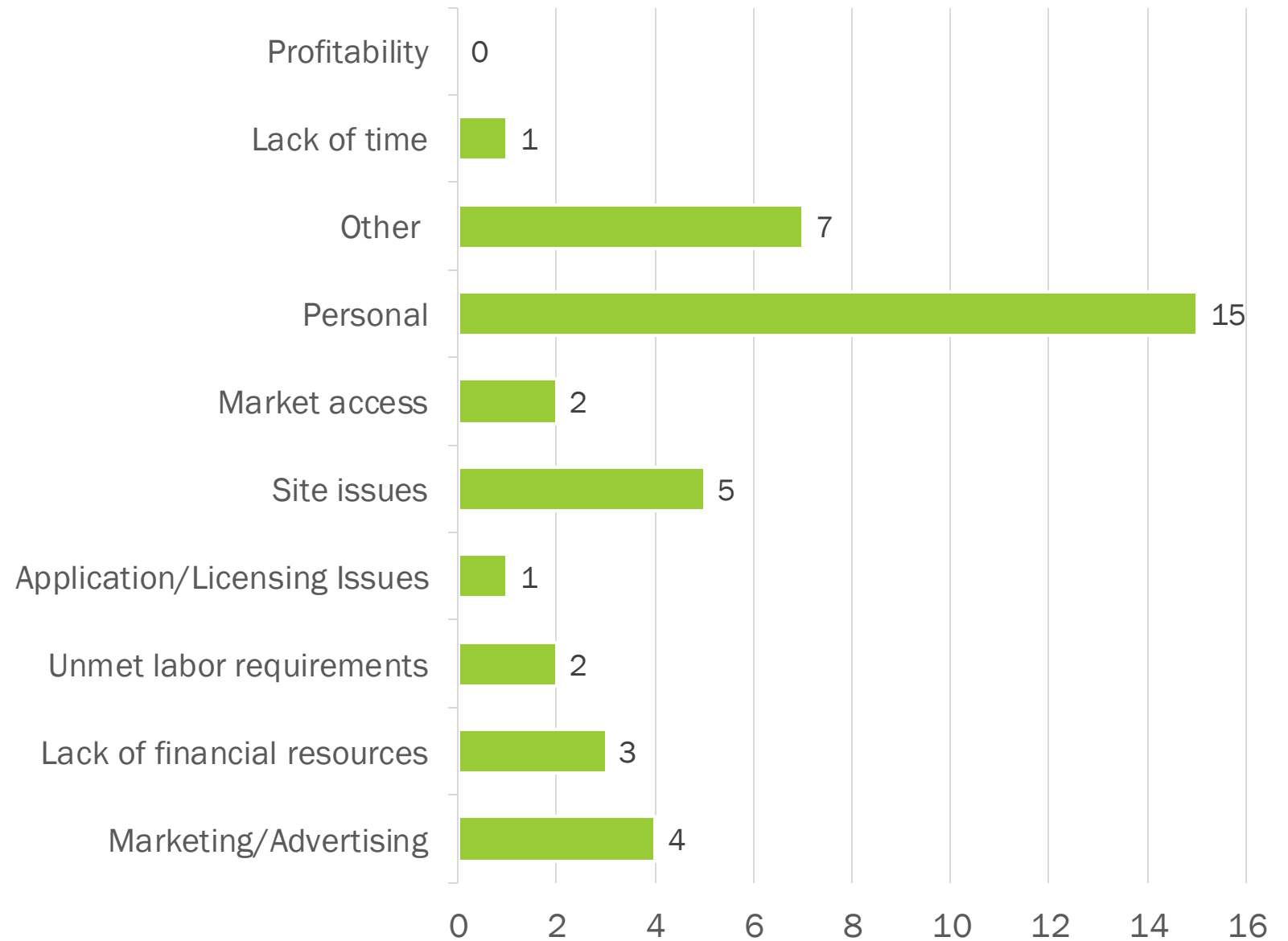
New initial applications since last Board meeting

Pending	Applying For
1	Indoor Cultivator Tier 1
1	Manufactures Tier 1
1	Manufactures Tier 2
1	Retail

# ADULT USE PROGRAM

Licensees confirmed not renewing as of 12/18/23

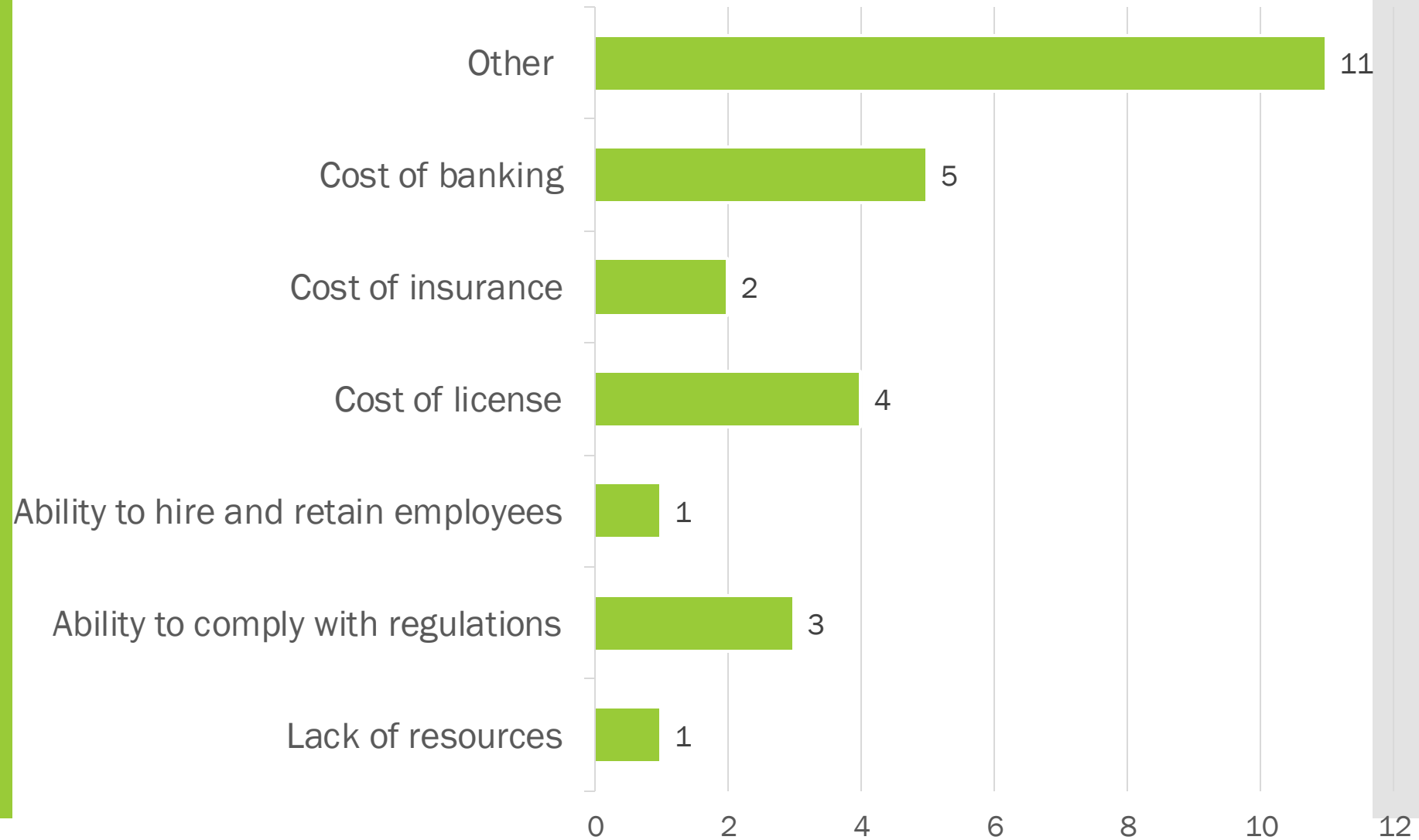
### Reason(s) for relinquishing license



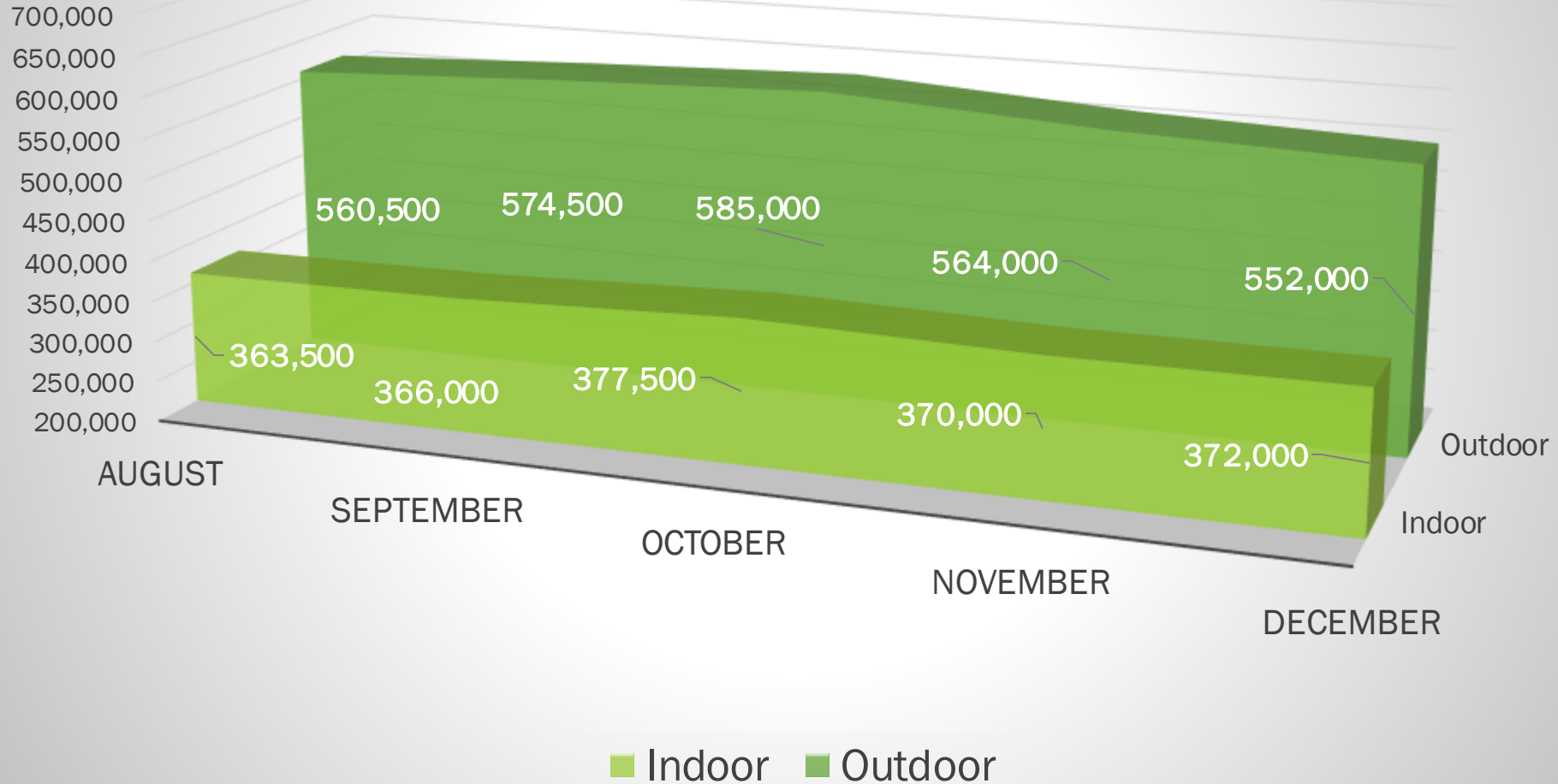
# ADULT USE PROGRAM

Licensees confirmed not renewing as of 12/18/23

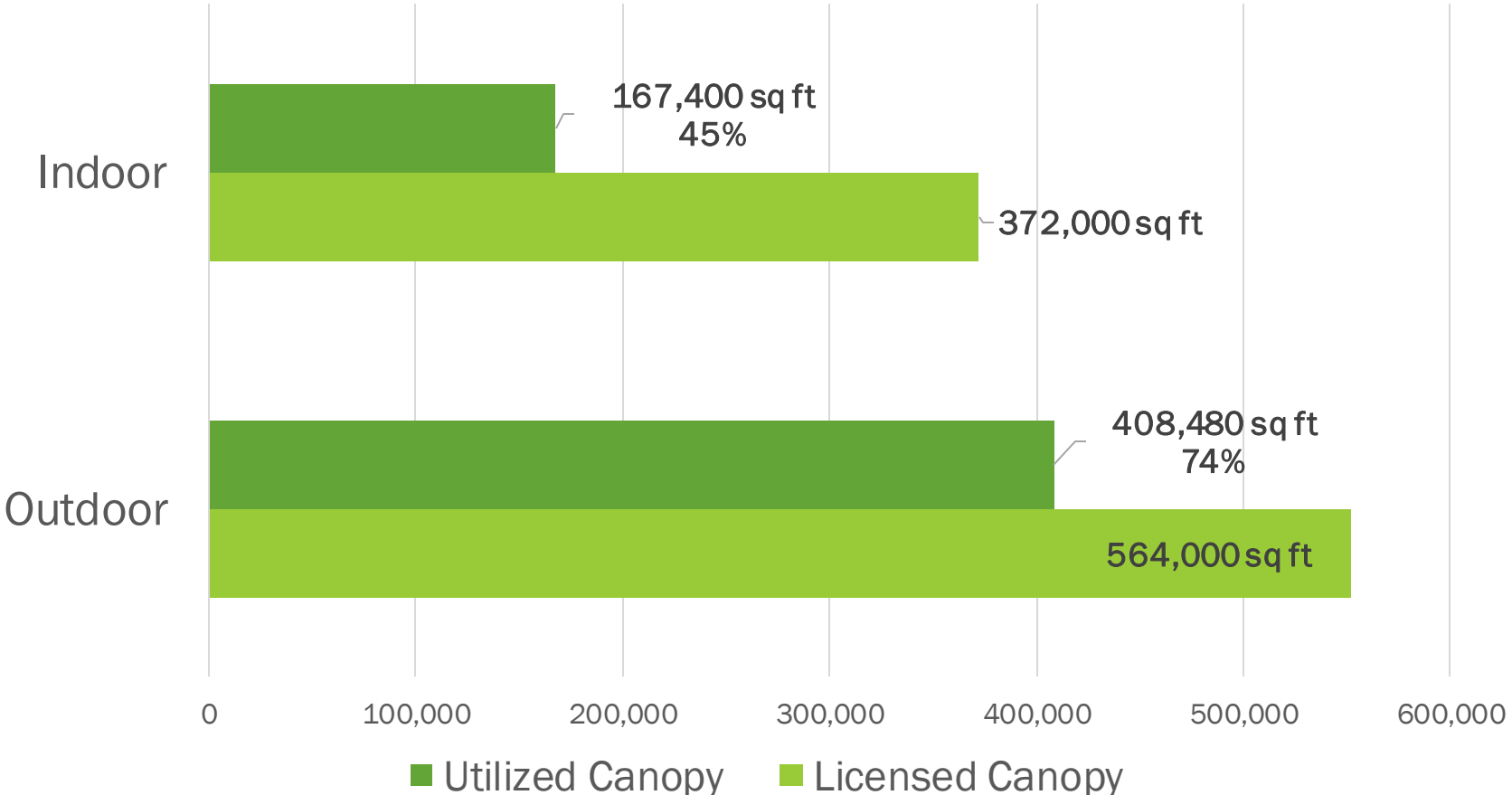
## Factors contributing to decision to relinquish license



# Licensed Canopy Capacity Square Footage



# Licensed Canopy Square Footage Capacity vs. Utilization



# Adult use program: compliance data

Data as of  
11/27/23

# ADULT USE PROGRAM

Summary of  
compliance  
work from  
11/28/23 –  
12/15/23

- **New complaints received: 10**
- **Total new investigations: 4**
  - Operating without a license
  - Compliance with Department of Fire Safety regulations
  - Compliance with employee ID card requirements
  - General compliance
- **Observation of product destruction due to license relinquishment: 2**
- **Notices of Violation issued: 5**
  - Inversion
  - Unlicensed retail sales
  - Failure to comply with Department of Fire Safety regulations
  - Operating without a license: failure to renew upon license expiration
  - Operating without a license: transitioning business ownership without a renewal
- **Corrective Action Plan issued: 2**
  - Compliance with Division of Fire Safety requirements
  - Compliance with insurance requirements for licensure



# Adult-Use Program: Staff Recommendations for Licensure

The following applicants have demonstrated compliance with all requirements for their license contained in CCB Rules 1.4 and 1.5 and 7 V.S.A. chapter 33.

# ADULT USE PROGRAM

Staff  
recommendations for  
initial licensure

Business Name	Priority Status	Applying For
Verdant Wisdom	Approved	Indoor Cultivator Tier 1 Small Cultivator
The Hidden Grove LLC	Economic Empowerment	Retailers

# ADULT USE PROGRAM

Staff recommendations for license renewal

Business Name	Priority Status	Applying For
Mr. Z Craft Cannabis Inc.	Approved	Indoor Cultivator Tier 3 Renewal
Vermont Medicine Man Botanicals	Approved	Mixed Cultivator Tier 1 Small Cultivator Renewal
OnlyinVT LLC, OnlyinVT, Only in VT	Approved	Outdoor Cultivator Tier 1 Small Cultivator Renewal
Crystal Mountain LLC	Standard	Outdoor Cultivator Tier 1 Small Cultivator Renewal
Stone Leaf Grow LLC	Standard	Mixed Cultivator Tier 2 Renewal
frank farm LLC	Standard	Outdoor Cultivator Tier 2 Renewal
Dalen Ltd.	Standard	Manufacturers Tier 2 Renewal
Tree Frog Farms, LLC; Tree Frog Farms	Standard	Outdoor Cultivator Tier 1 Small Cultivator Renewal
One Love Cannabis Collective, LLC	Standard	Outdoor Cultivator Tier 1 Small Cultivator Renewal
Cann Able Farms, LLC	Standard	Indoor Cultivator Tier 2 Renewal
ZsGreenZ LLC	Standard	Mixed Cultivator Tier 1 Small Cultivator Renewal
Vermont Hemp Craft LLC, d.b.a. Green Leaf Central	Standard	Retailers Renewal

# ADULT USE PROGRAM

Staff recommendations for license renewal

Business Name	Priority Status	Applying For
Emeraldrose Retail LLC	Standard	Retailers Renewal
Island Craft Cannabis, LLC; Island Craft Cannabis	Economic Empowerment	Mixed Cultivator Tier 1 Small Cultivator Renewal
Mad Hatter Cannabis and Hemp LLC	Economic Empowerment	Mixed Cultivator Tier 1 Small Cultivator Renewal
Sugarleaf LLC	Standard	Mixed Cultivator Tier 1 Small Cultivator Renewal
Green Valley Cannabis LLC	Standard	Mixed Cultivator Tier 1 Small Cultivator Renewal
First Light Flowers LLC	Economic Empowerment	Outdoor Cultivator Tier 2 Renewal
Snug Farm L.L.C.	Economic Empowerment	Outdoor Cultivator Tier 1 Small Cultivator Renewal
Somewhere On The Mountain	Standard	Retailers Renewal
District 802, LLC	Standard	Indoor Cultivator Tier 1 Small Cultivator Renewal
The Clean Cannabis Company	Standard	Indoor Cultivator Tier 3 Renewal
Overton's View Farm LLC	Standard	Mixed Cultivator Tier 1 Small Cultivator Renewal
The Green Man, LLC	Standard	Retailers Renewal
The High Country	Standard	Retailers Renewal

# ADULT USE PROGRAM

Staff recommendations for license renewal

Business Name	Priority Status	Applying For
Weed Connections	Standard	Indoor Cultivator Tier 1 Small Cultivator Renewal
Cabot Cannabis Cooperative	Pending	Outdoor Cultivator Tier 1 Small Cultivator Renewal
Lindie's Kitchen	Standard	Manufactures Tier 2
Lamoile County Cannabis	Standard	Retail

## ADULT USE PROGRAM

Recommendation for renewal of licensure contingent upon CCB staff issuing directives to the licensee pursuant to paragraph (d) of the licensee's active Corrective Action Plan

Business Name	Priority Status	Applying For
Rebel East VT LLC	Standard	Mixed Cultivator Tier 5