

Madame Chair:

The Department concurs with Cannabis Control Board in eliminating the cap for a variety of reasons. The primary reason is that there is a likely significant market for high-THC concentrates, and it is more dangerous for people to buy unregulated versions of these products as opposed to buying products that are regulated and tested in accordance with Board rules. Regulating instead of banning THC substances is in line with one of the purposes of creating a regulated market as envisioned by the General Assembly.

In addition, a complete ban on concentrates above 60% requires manufacturers to keep products below that limit at all times during the manufacturing process. Doing so will require the addition of additives to dilute the product down to a 60% concentrate or below. You may recall that there were recent illnesses and deaths that appeared to be associated with the ingestion of such additives.

Best,
David

David C. Englander ([he/him](#))
Senior Policy and Legal Advisor – Department of Health
Office of the Commissioner
108 Cherry Street, Suite 301, Burlington, VT 05402
Direct: 802.863.7282 |

