

To the Vermont Cannabis Control Board,

I'm writing because I believe Vermont's cannabis market is beyond a point that deserves immediate attention—specifically around retail shelf access for cultivators without retail licenses.

On paper, Vermont has around 110 retailers. But roughly half of those retailers also cultivate their own products. And while I completely understand why a retailer would prioritize cannabis they produce themselves, I think we need to be honest about what that means for the rest of the market.

When you start looking closely at menus across the state, a pattern becomes hard to ignore. Many vertically integrated retailers are primarily carrying house products, a handful of partner brands—often other businesses with retail access—and maybe one or two smaller producers.

No one is doing anything irrational here. Retailers are trying to survive in a difficult market. But the outcome of that reality matters.

If roughly 54 retailers are largely stocking their own products, the practical retail market for independent cultivators becomes dramatically smaller than licensing numbers suggest. Meanwhile, Vermont has roughly 300 cultivators all competing for access to a shrinking amount of shelf space.

And people are feeling this already.

More and more cultivators are struggling to move product—not because quality suddenly disappeared, but because meaningful access to consumers is becoming harder to secure. For businesses without retail licenses, success increasingly depends on relationships, reciprocity, and simply finding somewhere willing to make room.

That may not have been the intention of legalization, but it is becoming the reality many small cultivators are navigating.

I want to be clear that this is not about blaming retailers for carrying their own products. Most of us would likely make similar business decisions in the same position. The concern is that the current system appears to be concentrating market access in ways that make independence increasingly difficult to sustain.

And the longer this goes unaddressed, the harder it becomes to reverse.

Small cultivators are not just businesses on paper. Many are family-run operations that invested heavily, took on debt, hired employees, bought buildings, and entered this market believing there would be a viable path forward. If shelf access continues to narrow while cultivation capacity remains high, I worry we will continue to see more closures, more financial strain, and fewer independent operators left standing.

I also believe there is a practical way to help relieve some of this pressure: reopening retail licensing.

Right now, a relatively small number of retailers control access to consumers in a market with hundreds of cultivators competing for shelf space. When retail access is limited, the influence of vertically integrated operators naturally grows—not because anyone is doing something wrong, but because the system incentivizes it.

Reopening retail would not solve every challenge facing Vermont's cannabis market, but it would create more pathways for cultivators to reach consumers, reduce dependence on an increasingly limited number of buyers, and help restore some balance to a market that feels increasingly difficult for independent cultivators to access.

Importantly, this is not about taking anything away from existing retailers. Strong retailers with good customer relationships and thoughtfully curated menus will continue to succeed. But if Vermont wants independent cultivation to remain viable, there have to be enough meaningful pathways to market for those businesses to realistically survive.

Vermont still has an opportunity to address this before the market becomes even more concentrated than it already is.

I hope the Board takes a serious look at how vertical integration and shelf access are shaping the wholesale market—not to punish anyone, but to better understand whether the current system is functioning in a way that gives independent cultivators a realistic chance to survive.

Because from where many of us sit, this no longer feels like a future concern. It feels like something already happening.

Thank you for your time and consideration,

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