

Dear Chair and Members of the House Government Operations Committee,

Thank you for taking testimony on S.278 and for continuing to engage with Vermont's cannabis industry as the market evolves.

My family and I operate Zenbarn Farms and Vermont Patients Alliance, one of the original medical cannabis dispensaries in Vermont. Vermont Patients Alliance was one of the first dispensaries to open in the State, and we were proud to acquire the business from Curaleaf and bring it back into the hands of a locally owned Vermont family business. Today, we operate a Tier 5 indoor cultivation facility, manufacturing operations, and retail dispensaries here in Vermont as well as a music and events venue in Waterbury.

As operators with cultivation, manufacturing, retail, and event experience, we strongly support several provisions in S.278 that will help move consumers from the illicit market into the regulated market while supporting sustainable long-term growth for Vermont businesses.

First, I strongly support increasing the THC package limit from 100mg to 200mg. Vermont's current limits are out of step with consumer demand and neighboring markets. Higher potency limits will reduce packaging waste, improve consumer value, and help legal operators compete more effectively with the illicit market.

Second, I strongly support increasing transaction limits from one ounce to two ounces. Consumers should not be forced into multiple transactions or pushed back toward illicit channels simply because current purchase limits are too restrictive.

Third, I strongly support the creation of cannabis event permits and on-site consumption opportunities. This is one of the most exciting and important opportunities in the bill.

Vermont is uniquely positioned to become a leader in cannabis tourism and cannabis hospitality. Our State already has a strong culture around local agriculture, craft products, live music, food, wellness, tourism, and community events. Cannabis events fit naturally into that ecosystem and can create meaningful economic activity for local businesses, artists, venues, farms, and municipalities.

Importantly, regulated cannabis events create safe and controlled environments for adult consumers. Rather than pushing cannabis consumption into unregulated spaces, this framework allows the State to establish security requirements, age verification, product controls, and responsible oversight.

I would also strongly encourage the Committee to consider expanding the event framework beyond the currently proposed caps of 10 public and 10 private permits annually.

Other legal cannabis markets, including New York, have already demonstrated that cannabis events and consumption experiences can operate successfully and responsibly when properly regulated. These events help normalize the legal market, attract tourism, educate consumers, and create opportunities for licensed operators to engage directly with the public in safe environments.

Vermont should not be overly restrictive at launch. The current proposed limits may unintentionally constrain innovation and economic opportunity before the market

has a chance to develop. A more flexible pilot structure or a pathway for additional permits based on successful compliance outcomes would better support long-term success.

I also urge the legislature to consider broader reductions in cannabis license fees across all license categories — not just outdoor cultivators. Vermont should reward efficiency, sustainability, and operational excellence regardless of cultivation style or scale.

Our company operates a highly sustainable mixed-light cultivation facility using state-of-the-art LED lighting, environmental controls, and energy-efficient systems. We have invested heavily in sustainability and infrastructure improvements that align with Vermont's environmental values. Policies should encourage innovation and efficiency across the entire regulated market, not unintentionally favor one cultivation method over another.

I also think it is important to address the perception underlying parts of the delivery proposal that Tier 1 and Tier 2 cultivators represent “small farmers” while larger tier cultivators do not.

The reality is that essentially all Vermont cannabis cultivators are small businesses and small farmers relative to the broader national cannabis industry. Even Vermont's highest cultivation tiers would still be considered small craft operations in nearly every other legal market in the country.

Many larger-tier Vermont cultivators have made substantial investments into infrastructure, environmental controls, compliance systems, energy efficiency, staffing, and long-term operational stability. These businesses often employ significantly more Vermonters, carry much higher overhead, and are deeply committed to building sustainable long-term operations within the State. Meanwhile, many smaller cultivators may have minimal infrastructure investment, little or no staff, outside sources of income, and the flexibility to pause operations entirely if market conditions become difficult.

Supporting “small business” in Vermont cannabis should not mean excluding operators who have taken on greater risk, created more jobs, invested heavily in sustainability and compliance, and are producing equally craft-focused, high-quality products.

For that reason, I have significant concerns regarding the proposed delivery permit structure. While delivery is an important service that should absolutely be explored for Vermont consumers, I oppose limiting delivery access exclusively to Tier 1 and Tier 2 cultivators and manufacturers that do not hold retail licenses.

Retailers across Vermont are already struggling in a difficult market environment. Creating a delivery structure that bypasses retailers risks further destabilizing an already fragile retail ecosystem. Customers build trusted relationships with dispensaries and retail staff, and retailers play an important role in education, compliance, and responsible sales.

Delivery should be viewed first and foremost as a consumer service — not as a mechanism to selectively prop up certain segments of the industry.

If Vermont moves forward with delivery, I would encourage lawmakers to consider a framework that is accessible to all compliant operators or potentially a standalone statewide delivery model that could integrate with existing logistics infrastructure and delivery platforms. There is no need to reinvent the wheel when scalable delivery systems already exist.

Thank you again for your consideration and for your continued work to improve Vermont's cannabis marketplace in a thoughtful and sustainable way.

Sincerely,

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