

Tuesday, June 2, 2026

The Honorable Louis P. DiPalma  
Chairman, Senate Finance Committee  
Rhode Island Senate  
82 Smith Street  
Providence, RI 02903

**RE: S 3215 – An Act Relating to Agriculture and Forestry – Rhode Island Hemp THC Beverage Act**

Dear Chairman DiPalma,

The Cannabis Control Commission submits this letter regarding S 3215 – Rhode Island Hemp THC Beverage Act – to provide technical feedback and highlight considerations related to implementation, public health, and alignment with the Commission’s prior recommendations issued in the Study on Hemp-Derived Beverages, prepared pursuant to Joint Resolution 2025 R388, enacted on July 5, 2025.

The Commission recognizes the intent of this legislation is to establish a regulated framework for hemp-derived THC-infused beverages, which aligns with its statutory responsibilities to ensure product safety and prevent youth access.

In March 2026, the Commission submitted a comprehensive study to the General Assembly outlining a recommended regulatory framework for these products. That framework emphasized key components including low-dose products, clear labeling, controlled retail access, defined licensing structures, and administratively feasible enforcement. While this legislation reflects several of these principles, it diverges from the Commission’s recommendations in several important areas.

Specifically, the bill establishes a limit of five (5) milligrams of THC per container, whereas the Commission recommended a more conservative one (1) milligram standard and advised against multi-serving formats to reduce overconsumption risk and support clearer consumer understanding.

The legislation also authorizes broad retail participation and permits on-premise consumption in certain settings. The Commission’s recommendations contemplated a more limited retail structure and did not include on-premise consumption due to considerations related to impairment, monitoring, and public safety.

The Commission also notes that the legislation introduces new licensing and endorsement structures, including manufacturing facilities and infused-beverage endorsements, which expand beyond the Commission’s recommended framework and may create additional regulatory complexity.



Further, provisions allowing the production, possession, and storage of products that are not compliant with Rhode Island law for the purpose of out-of-state sale raise significant enforcement and diversion concerns. Allowing non-compliant products to be manufactured and stored within the state presents operational challenges and represents a substantial departure from existing regulatory standards.

The Commission also notes that the bill includes changes to the regulatory authority structure, including provisions that shift oversight responsibilities and modify the composition of the Cannabis Advisory Board. These changes may create inconsistencies with existing statutory authority and conflict with ongoing legislative proposals related to the Board's structure.

Finally, while the Commission supports strong testing standards, alignment with existing cannabis and hemp regulatory frameworks may provide a more practical and scalable approach.

The Commission remains committed to working collaboratively with the General Assembly to ensure any adopted framework is clear, enforceable, and aligned with public health and safety objectives.

Thank you for your consideration.

Sincerely,

Michelle A. Reddish, MS, MPH  
Cannabis Office Administrator

CC: Honorable Members of the Senate Finance Committee  
Kristen Silvia, Director of Legislation and Deputy Chief of Staff  
Patricia Resende, Director of Senate Policy