

Thursday, March 12, 2026

The Honorable Matthew L. LaMountain
Chairman, Senate Judiciary Committee
Rhode Island Senate
82 Smith Street
Providence, RI 02903

Subject: S2961 – An Act Relating to Food and Drugs – The Rhode Island Cannabis Act

Dear Chair LaMountain,

The Cannabis Control Commission (Commission) submits this letter of support to provide educational context regarding S 2961 – An Act Relating to Food and Drugs – The Rhode Island Cannabis Act. This legislation was introduced at the request of the Commission and would amend the Rhode Island Cannabis Act to remove the requirement that cannabinoids be expressed as dry-weight percentages and instead allow testing and reporting of cannabis products “as is,” a change the Commission supports as it aligns the statute with current testing practices.

Under current statute, cannabinoid profiles are defined using dry-weight percentages. In practice, this approach is inconsistent with how cannabis products are consumed and has raised concerns nationally regarding the inflation and comparability of THC potency results. Most states, including neighboring jurisdictions, require cannabis to be tested and labeled in its consumable form rather than recalculated to a dry-weight basis.

Massachusetts, for example, determined early in its regulatory process that dry-weight reporting could lead to inaccurate and misleading potency information and therefore never implemented such a requirement. National best practices have continued to move toward “as is” testing to promote transparency, consumer understanding, and consistency across product categories.

In Rhode Island, the current operational standard remains “as is” testing, as the dry-weight requirement has not yet been implemented. The proposed amendment would align statute with existing practice and regional norms, reducing the risk of consumer confusion and preserving the integrity of product labeling without altering dosage limits, enforcement authority, or public health safeguards.

The Commission notes that any statutory change would require corresponding updates to regulatory definitions to ensure clarity and consistency across testing, labeling, and compliance frameworks. The Commission works closely with the Rhode Island Department of Health and licensed testing laboratories and would continue to do so to ensure that any statutory updates are implemented accurately and responsibly.



The Commission offers this context to support the General Assembly's consideration of the issue and remains available to provide technical expertise, data, and operational insight as legislative discussions move forward.

Thank you for your thoughtful consideration.

Sincerely,

Michelle A. Reddish, MS, MPH
Cannabis Office Administrator

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