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March 24, 2026

Re: Cannabis Bills  
House Commerce Finance and Policy Committee  
March 25, 2026 Hearing

Chairs Koegel and O'Driscoll, and members of the committee,

My name is Kyle Marinkovich, and I am the CEO of Northern Diversified Solutions, a Minnesota-based hemp processor and lower-potency hemp edible manufacturer. Additionally, I serve on the Cannabis Advisory Council as the cannabis manufacturing expert.

Thank you for providing the opportunity to provide feedback on House Files 4201 and 4397. I appreciate Representative Hanson's willingness to engage in discussions on these bills.

### **House File 4201**

We strongly support several provisions in this bill, particularly the allowance of QR codes for certain labeling disclosures, which will give consumers access to detailed product information while addressing the real limitations of label space. We also support provisions that allow hemp businesses to participate in the broader cannabis licensing framework, which will help experienced operators transition into the cannabis market, especially during a time when the future of hemp is uncertain.

I want to highlight one technical issue in the current bill language related to labeling. House File 4201 removes the requirement to disclose cultivator identities for adult use and medical cannabinoid products, but retains that requirement for lower-potency hemp edibles.

In practice, this requirement is extremely difficult for hemp products to meet because hemp ingredients are often sourced from multiple cultivators and

combined into larger batches before final manufacturing. Unlike cannabis products, hemp products are not tracked through a statewide seed-to-sale system, and many hemp inputs come from a national marketplace. Requiring cultivator disclosure in these circumstances creates a compliance obligation that is often impossible to satisfy and does not meaningfully improve consumer safety.

The recommendation from the Cannabis Advisory Council's Industry Health Workgroup discussed and addressed this issue in its [recommendations to the Cannabis Advisory Council](#), which were adopted by the full Council. Specifically, I would like to highlight from the "problem" section of recommendation no. 2:

*"Manufactured products can also come from multiple sources and/or stop using a source, therefore **adding farms and their respective license numbers to labels will be cumbersome and inefficient.**"*

While the current legislation, in its current form, addresses this particular issue for cannabinoid products, it leaves out that consideration for the lower-potency hemp edible products that are more cumbersome to track, and therefore disclose. We look forward to continued engagement with the legislature on OCM to address this issue.

## House File 4397

Northern Diversified Solutions strongly supports the plan to streamline Minnesota's cannabis supply chain, but we do want to highlight one issue that could be better addressed as this bill moves through the legislature.

Despite primarily operating in the lower-potency hemp edible space, Northern Diversified Solutions is proud of our partnership with Minnesota's medical cannabis industry, where we provide hemp concentrate for medical cannabinoid products that contain higher concentrations of CBD, CBG, and other non-intoxicating, hemp derived cannabinoids.

**Current law does not clearly authorize the use of hemp-derived non-intoxicating cannabinoids in cannabinoid products, creating unnecessary barriers to producing balanced "ratio products." HF 4397 addresses this barrier for medical cannabinoid products, but does not extend their use to adult use products.** We are grateful the legislation addresses medical cannabinoid products, which we

wholly agree are priority, however, NDS hopes to see this extended to adult use products, as well.

CBD and other non-intoxicating cannabinoids reduce the psychoactive effects of THC and are widely used to create “ratio products,” such as 1:1 THC: CBD formulations, that provide a more balanced experience for consumers. These products are commonly available in forms such as edibles, tinctures, and vaporized oils, and are often preferred by patients and consumers seeking reduced psychoactivity.

While older, data from the Office of Medical Cannabis<sup>1</sup> (now the Division of Medical Cannabis) looked at use patterns of medical cannabis patients enrolled in the first two years of the medical cannabis program (July 2015 - June 2017). The data showed that “Very High THC”<sup>2</sup> products made up only about 50% of medical cannabis sales, with ratio products making up the remainder:

Product Type	THC:CBD Ratio	Percent of Sales
High THC to CBD	>4:1 up to 99:1	6%
Balanced	1:1 up to 4:1	34%
High CBD to THC	>1:1 up to 1:99	9%
Very High CBD to THC	1:100 or higher	<1%

[Source: Medical Cannabis Use Patterns: Patients with First Enrollment July 2015-June 2017, Figure 1](#)

These products are not niche – they represent a substantial share of patient use and reflect a clear demand for balanced cannabinoid formulations.

In addition to the medical cannabis market, these products are popular in the lower-potency hemp edible market, as well. Northern Diversified Solutions helps brands formulate these products throughout the country. We estimate that more than half the ingredients we produce are for ratio products.

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<sup>1</sup> [Medical Cannabis Use Patterns: Patients with First Enrollment July 2015-June 2017](#)

<sup>2</sup> Very High THC = 100:1 THC:CBD or higher

Chapter 342 does not clearly authorize the use of hemp concentrate or hemp-derived cannabinoids in cannabis products, which led the Office of Cannabis Management (OCM) to temporarily halt medical cannabis products containing hemp-derived cannabinoids this past fall—putting nearly 80,000 patients at risk of losing access to products they rely on.

Ultimately, OCM reversed course and has allowed the use of hemp concentrate in medical cannabinoid products. However, we believe the explicit inclusion of hemp concentrate in the statutory definition of “medical cannabinoid product” (lines 3.16 to 3.17) will prevent future disruptions and provide needed clarity to both regulators and manufacturers.

Where HF 4397 falls short is in failing to extend this clarity to adult-use cannabis products.

OCM’s current position, in the absence of clear statutory direction, is that hemp concentrate may not be used to create adult-use cannabis products. Northern Diversified Solutions respectfully requests that the legislature explicitly authorize cannabis businesses to use hemp-derived non-intoxicating cannabinoids in the manufacture of both medical and adult-use cannabis products.

Providing access to these “ratio products” across both markets will give consumers lower-psychoactivity options, support safer consumption, and align with broader public health and harm reduction goals.

We appreciate Representatives Hanson and West continuing to engage with us on this issue and hope to see an amendment to HF 4397, prior to final passage and the end of the legislative session.

Thank you for your time and for your work on this important legislation. Please feel free to reach out to me with any questions.

Sincerely,

Kyle Marinkovich