



Office of the Attorney General

Amendments to Conn. Gen. Stat. § 21a-420c

Effective October 1, 2024

Granting municipal officials broad new powers
to combat the sale of illicit cannabis



Powerful New Tools to Combat Illicit Cannabis Sales within Cities and Towns Conn. Gen. Stat. § 21a-420c (as amended)

- The sale of cannabis without a license is now a per se violation of the Connecticut Unfair Trade Practices Act, which allows municipalities to bring an action in court;
- If the chief executive officer of a municipality determines that a business is operating in violation of the law or poses an immediate threat to public health and safety, you may apply to the superior court for an order to take possession of prohibited merchandise;
- Any municipality may, by vote of its legislative body, prohibit the operation of any business within such municipality that is found to be in violation or if such operation poses an immediate threat to public health and safety.



Penalties & Costs

- Imposes liability upon any person who aids or abets a violation of the statute and imposes a civil penalty of \$30k for each violation;
- Imposes liability on commercial landlords who knowingly rent or lease property to a business selling cannabis products and imposes a civil penalty of \$10k for each violation;
- **Municipalities may recover their costs** in instituting an action, and **one half the remainder of the civil penalty** shall be **payable to the municipality** itself, while the other half shall go to the General Fund.



Packaging and Labeling

Cannabis and high-THC hemp products must meet strict packaging and labeling guidelines:

Labels must clearly indicate:

- Brand name
- Presence of THC or CBD
- Serving size, dosing and other information
- Plain contrasting color with Times New Roman font

Packaging must be:

- Child-, tamper-, and light-resistant
- Uniformly one color
- Packaging for edible products must be white



Signs of Illicit Products



- Brightly colored packaging
- Not labeled with required information
- Not child- or tamper-resistant





What to Look For

Is the packaging child-, tamper-, and light-resistant?

Is it packaged in a single color?

Does it look like another product like candy or chips?

How much THC does it have?
Does it exceed the total THC allowed for a hemp product?



Does the packaging or labeling use images or names that appeal to children or people under 21?

Does it have the required symbols?



Does the packaging or labeling contain explicit or inappropriate language or images?



What to Look For

Colorful packaging

Multi-colored label

Clear container
(not light-resistant)

Not child- or
tamper-resistant

Exceeds the limit for total
THC allowed in a hemp
product (1mg/serving for
edibles)



Exceeds the limit for total
THC allowed in a hemp
product (5mg/container
for edibles)

No required warning
statement outlined in
a red box

Appeals to children

Does not
have the
required
symbols





What to Look For

Holographic label

Clear container
(not light-resistant)

Not child- or
tamper-resistant



No required warning
statement outlined in
a red box

Contains synthetic
cannabinoids (THCP)

Name is confusingly
similar to an existing
product and can
appeal to children

Does not
have the
required
symbols





Hemp Product Restrictions

Cannot mislead a consumer by incorporating any statement, brand, design, representation, picture, illustration or other depiction that bears a reasonable resemblance to trademarked or characteristic packaging of another cannabis or non-cannabis product.





Licensed Cannabis Establishments

Cannabis and high-THC hemp products can only be sold at the following licensed cannabis establishment types:

- **Dispensary facilities** – Medical marijuana patients only
- **Hybrid retailers** – Medical marijuana patients and adult-use consumers
- **Retailers** – Adult-use consumers only

Licensed cannabis establishments require security and age verification to enter. If you can walk right in without showing your identification, it's likely not licensed.



If You Find Illegal Cannabis

- If local or state police find cannabis at a business establishment, we recommend looking up to see whether or not the business holds a credential with DCP.
 - <http://ct.gov/cannabis>
 - <http://elicense.ct.gov>
- If the business holds a cannabis dispensary, hybrid retailer, retailer or delivery service license from DCP, they may legally sell cannabis products. If there is an issue at a licensed cannabis facility, contact DCP at dcp.cannabis@ct.gov immediately.



Why This is Important

- Studies show that since 2002 there has been a general increase in cannabis use among individuals ages 12 and older.
- Adolescent use is trending toward more potent products and delivery methods.
- Cannabis use during adolescence is associated with greater risk of poor educational outcomes, cannabis dependence, psychotic symptoms, anxiety and suicide attempts.
- We do not believe that minors are purchasing cannabis in the legal market.
- The uptick in youth use is occurring because these illicit cannabis products are available at convenience stores, gas stations, bodegas, and other stores where youth have access.



Going Forward

- Our office will continue to devote considerable resources into combatting illicit cannabis sales, particularly when it comes to products that target youth.
- We do not intend to stop bringing enforcement actions, but this is a public health concern that requires a full court press.
- Our office is happy to act as a resource and to answer any questions you may have.
 - We would also welcome a chance to meet with your police chiefs or town attorney.