



CONNECTICUT Consumer Protection

TO: Licensed Cannabis Establishments

FROM: Connecticut Consumer Protection, Drug Control Division

DATE: October 15, 2024

RE: Cannabis Secure Storage Requirements: Guidance for the Separate Locked Caged Area, Room, or Enclosure

The latest edition of the Department's [policies and procedures](#), which went into effect on September 15, 2024, added a definition for "approved secure location" which provides cannabis establishments with flexibility in the secure storing of cannabis.

To support cannabis establishments, the Department has developed a resource for licensees that are remodeling or building a new facility to include a secure location. In addition to the attached guidance, you are encouraged to work with your assigned representative from the Drug Control Division on how to best implement the guidance based on your particular circumstances.

The Department will also be hosting an informational session about secure locations. The session is open to all registrants and will be in-person only. Information for the session is as follows:

Secure Storage Information Session

State of Connecticut
450 Columbus Boulevard
Plaza Level, Rooms C and D
Hartford, CT 06103
November 8, 2024, 9:00-10:00 AM

To register for the information session, go to <https://forms.office.com/g/nM8quRDLWq>. If you are attending the session, please park on the street or at the Morgan Street Garage located at 155 Morgan Street located diagonally across the street from 450 Columbus Boulevard. Valid identification is required to enter the building.

Should you have questions, please contact the Department at DCP.cannabis@ct.gov.



Cannabis Secure Storage Requirements: Guidance for the Separate Locked Caged Area, Room, or Enclosure

This document is a resource for licensees that are remodeling or building a new facility that will include a secure location. There are many different ways to develop a secure location at a cannabis establishment. Each individual location will be evaluated based on the specific circumstances and factors at that particular location. Work with your assigned representative from the Department of Consumer Protection Drug Control Division on how to implement this guidance based on your particular circumstances. For the vault or safe requirements, please see the definitions in Section 21a-262-1 of the Regulations of CT State Agencies.

A “Secure Location” means: (1) An approved vault; (2) an approved safe equipped with a separate effective electrical alarm system; or (3) a separate secure locked caged area, room, or enclosure equipped with a separate effective electrical alarm system. If a caged area or enclosure is used, then (1) such caged area or enclosure must be completely enclosed; and (2) construction must be of heavy gauge wire mesh having openings smaller than the smallest controlled substance(s) containers stocked.¹

Considerations for Secure Locations where Cannabis is Stored

1. The Secure Location shall be a physically and visually distinct area within the cannabis establishment facility. Consideration should be given to the site of that Secure Location within the facility and any shared wall. For instance, if the shared wall is an external wall, additional reinforcement on that wall may be required.
2. The Secure Location is considered to have a least six (6) sides, each of which are evaluated individually. For instance, if the floor or ceiling have a space above or below, the licensee should review and inform the department of the following:
 - a. Who owns that space;
 - b. What is the access to that space during and outside of the hours of operation of the facility; and,
 - c. What security measures are in place to prevent and detect access during and outside of the cannabis establishment’s operating hours?
3. Whenever possible, the Secure Location should be located away from any entrance or exit point from the cannabis establishment facility. If the Secure Location is near an entrance or exit point, additional security measures against diversion should be developed.

¹ See Section 21a-262-4 of the Regulations of CT State Agencies and Public Act 24-76, Section 21.

4. The Department of Consumer Protection (DCP) will consider the physical footprint of the cannabis facility and the volume of cannabis anticipated for handling at such facility when determining the sufficiency of the Secure Location. Facilities handling large quantities of cannabis may warrant additional security to ensure authorized access and diversion prevention.
5. When determining the appropriate type of Secure Location, consideration should be given to any specific security concerns related to the location or layout of the cannabis establishment.
6. The Secure Location must be accessible to the fewest employees required to operate the cannabis establishment.
7. The inside of the Secure Location should not be visible, or must be limited to the greatest extent possible, from outside of the Secure Location to deter diversion or theft of product.
8. The Secure Location should be limited to one egress point, with no window access, unless otherwise approved by the DCP.
9. The Secure Location must be equipped with swipe access or other technology to log each individual's access into the Secure Location.
10. All entry points into the Secure Location, including any pass-through window, shall have a door that automatically closes and locks upon release, which may not be propped open during operation, but may act as a day gate.² All entry points, including any pass-through, must also be secured and separately alarmed overnight to sufficiently detect unauthorized entrance. Depending on the license type (e.g. retailer vs manufacturer) and operation of the cannabis establishment, there are numerous ways to adapt your build-out to accommodate this requirement. Work with your assigned Drug Control Agent to figure out what works best for your facility.
11. If installing a "pass-through" window, the following restrictions apply:
 - a. The pass-through window will be treated as an entry point.
 - b. The size of the pass-through window must be limited to the smallest area reasonably necessary to do business.
12. While "work in progress" material is encouraged to be stored in the Secure Location, the primary purpose of the Secure Location is to provide additional security for long-term and overnight storage of finished goods. Alternatively, solutions for the temporary storage of work in progress material, such as locked cabinets/refrigerators within a limited access room with full camera coverage, may be deemed acceptable, given the totality of the circumstances (i.e. other security features, quantity, desirability and likelihood for diversion, and special processing requirements).

Specific Considerations for Different Types of Secure Locations

U.S. Drug Enforcement Agency Wire Cages or Similar Free-standing Caged Areas/Enclosures

² A "day gate" is a door that requires swipe access and limits access to the secure location during the hours of operation to restrict access to the secure location while allowing for efficient operation. A day gate alone may not be sufficient for overnight storage.

- a) Sides of the cage or enclosure shall be constructed using 10-gauge wire mesh or thicker or, if using another material, the structural equivalent.
- b) As referenced in the regulation, the openings must be smaller than the smallest container stored within. Larger holes may be permitted, depending on placement of cage or additional security features. Ex: cage directly abuts four walls.
- c) All wire cage attachment points shall be secured to prevent disengagement. Acceptable methods include, but are not limited to, braising, pinning or another similar process or technology sufficient to limit disengagement of the attachment points.
- d) Steel posts no less than 1" in diameter and no farther than 10' apart.
- e) 1.5" steel horizontal reinforcement no farther than 5' apart.
- f) Either a ceiling constructed in the same manner, or the sides of the cage or enclosure extending all the way up to the structural ceiling of the building.

Custom-Built Secure Room

- g) The walls shall be fortified using 10-gauge wire mesh or thicker or, if using another material, the structural equivalent. The mesh or equivalent material must only be overlapping along a stud and must be affixed to the interior section of the wall.
- h) As referenced in the regulation, the openings must be smaller than the smallest container stored within. Larger holes may be permitted, depending on placement of cage or additional security features.
- i) All wire mesh attachment points shall be secured to prevent disengagement, which process shall meet or exceeds the manufacturer's recommendation. Acceptable methods include, but are not limited to, braising, pinning or another similar process or technology sufficient to limit disengagement of the attachment points.
- j) All studs should be at minimum 2" x 4" wood or 16-gauge steel, set 12" apart on center or less.

Relevant Statutes and Regulations

CT General Statutes Section 21a-4211 (b)

A cannabis establishment shall (1) store all cannabis in such a manner as to prevent diversion, theft or loss, (2) make cannabis accessible only to the minimum number of specifically authorized employees essential for efficient operation, and (3) return any cannabis to a secure location at the end of the scheduled business day. For the purposes of this subsection, a location shall be deemed to be secure if the location satisfies the requirements imposed in subsection (b) of section 21a-262-4 of the regulations of Connecticut state agencies for controlled substances listed in schedules III, IV and V of the Connecticut controlled substance scheduling regulations adopted pursuant to section 21a-243.

Regulations of Connecticut State Agencies Section 21a-262-4

(b) Schedule III, IV, V Stock shall be stored in an approved vault, approved safe equipped with a separate effective electrical alarm system, or separate secure locked caged area, room, or enclosure equipped with a separate effective electrical alarm system. If a caged area or enclosure is used, such caged area or enclosure must be completely enclosed. If a caged area is used, construction must be of heavy gauge wire mesh having openings smaller than the smallest controlled substance(s) containers stocked.