



Cannabis Display Guidance

January 8, 2025

Pursuant to the Department's Cannabis Policies and Procedures effective September 15, 2024, Cannabis Dispensary Facilities, Hybrid Retailers and Retailers may now display cannabis in their establishment, provided the secure display and handling of cannabis complies with the restrictions set forth in section 21a-421j-14 of the Department's Cannabis Policies and Procedures. The guidance below is intended to clarify the guiding principles that the Department will use in evaluating display compliance. This guidance does not cover every scenario, and issues of compliance will depend on the unique factual circumstances at hand. It is the sole responsibility of each licensee to ensure their cannabis display complies with all applicable laws.

SETTING UP YOUR CANNABIS DISPLAY

- Only a key employee or licensed pharmacist employed by the cannabis establishment may remove cannabis from its original packaging. The removal and display of cannabis shall be performed in a manner consistent with the Department's security requirements for the establishment, including direct camera coverage. Cannabis removed from its original packaging must be immediately transferred into display containers that prevent the following:
 - Physical contact, such as touching, tasting, or any access by any individual;
 - Diversion, loss, theft, or misplacement;
 - Adulteration, including contamination and degradation; and
 - Unauthorized use, such as selling or inappropriately disposing of display cannabis.
- Once display cannabis is removed from its original packaging, the packaging must be retained for as long as the cannabis is on display. The display packaging must be marked as "FOR DISPLAY ONLY", and include a separate Unique Identifier (UID) generated by BioTrack for the display cannabis.

Q: Can I select products from my inventory for display or must I receive them from the originating establishment already designated as a display product?

A: You can either receive a specific UID designated for display or sublot a quantity from your purchased inventory. The display product should be labeled with a unique UID and "FOR DISPLAY ONLY". It should also accurately represent the cannabis for which it is being displayed, meaning that it is consistent with what would ultimately be received by a consumer. If a display product is sub-lotted from a quantity received into inventory, it must be destroyed by the establishment displaying the cannabis. Otherwise, the display cannabis may be returned to the originating cannabis establishment for destruction. Regardless, all display products must ultimately be marked for destruction, in accordance with the licensee's approved standard operating procedure (SOP).

CANNABIS DISPLAY CONTAINERS

- Display containers must be immediately transferred to and maintained in a locked and secure display case, and, in the Cannabis Analytic Tracking System, the display cannabis must be segregated from saleable inventory.
- Display containers must remain in a: (1) locked and secure display case when it is not actively being displayed by an authorized employee, and (2) a Department-approved secure location whenever the establishment is closed to the public.
- The total amount of cannabis removed from its packaging for display at an establishment may not exceed one (1) pound of raw cannabis or the equivalent in extract, in aggregate, at any time.
- The cannabis in a display container must be representative of the cannabis for which it is on display.
- Cannabis must not be displayed beyond the expiration date listed on its label.

Q: Can I use a tether system to display cannabis products?

A: Display containers may incorporate a tether feature, but display cannabis must still be in a locked and secure display case when it is not actively being displayed by an authorized employee.

CANNABIS ON DISPLAY

Display cannabis must be maintained and tracked separately in the following manner:

- It must be provided a separate UID in the Cannabis Analytic Tracking System;
- It must not be sold or gifted and must be segregated both physically and in the CT Cannabis Analytic Tracking System from saleable products; and
- Upon the earlier of expiration or discontinuation of display, it must be disposed of in accordance with section 21a-421j-3 of the Department's Cannabis Policies and Procedures.

Q: Can I include non-compliant, colorful packaging as part of the display for a product?

A: Product displays are considered advertisements and are subject to advertising requirements and restrictions set forth in the Department's cannabis laws, such as the prohibitions on appealing to children, as well as Connecticut's Unfair Trade Practices Act. It is also important to note that the cannabis in a display container must be representative of the cannabis for which it is on display.

Q: Can my display include items other than cannabis?

A: Yes, provided the contents of your display are compliant with the advertising rules for cannabis.

Q: Can medical patients, caregivers or consumers handle the display cannabis?

A: Cannabis display containers can be handled, provided (1) the cannabis display container was removed from the locked and secure display case by an authorized employee, (2) the cannabis remains in its display container, (3) handling must be done under the direct supervision of an authorized employee, and (4) the display container for that display cannabis must be immediately returned to the locked and secure display case when the authorized employee is done displaying it.