Kyle Marinkovich
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12272 Nicollet Ave.
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March 16, 2026

Re: SF 4429 – Labeling Provisions
Senate Commerce and Consumer Protection Committee
March 17, 2026 Hearing

Chair Klein and members of the committee,

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

First, I want to thank the committee for considering SF 4429. 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. SF 4429 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.

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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 appreciate Senator Port's willingness to engage around updating this language to remove the cultivator disclosure from lower-potency hemp products to bring parity with cannabinoid products.

Thank you for your time and for your work on this important legislation.

Sincerely,

Kyle Marinkovich
CC: Maren Schroeder
Carol Moss