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March 23, 2026

Re: SF 4541 – Streamlining,
Senate Commerce and Consumer Protection Committee
March 24, 2026 Hearing

Chair Klein 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 comment on SF 4541, the supply chain streamlining plan. 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." SF 4541 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[1] (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"[2] 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.

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

[1] Medical Cannabis Use Patterns: Patients with First Enrollment July 2015-June 2017

[2] Very High THC = 100:1 THC:CBD or higher

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 SF 4541 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 Senator Dibble’s engagement with NDS on this issue and hope to see an amendment to SF 4541, either during the March 24th hearing or during mark-up, to address this issue.

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