

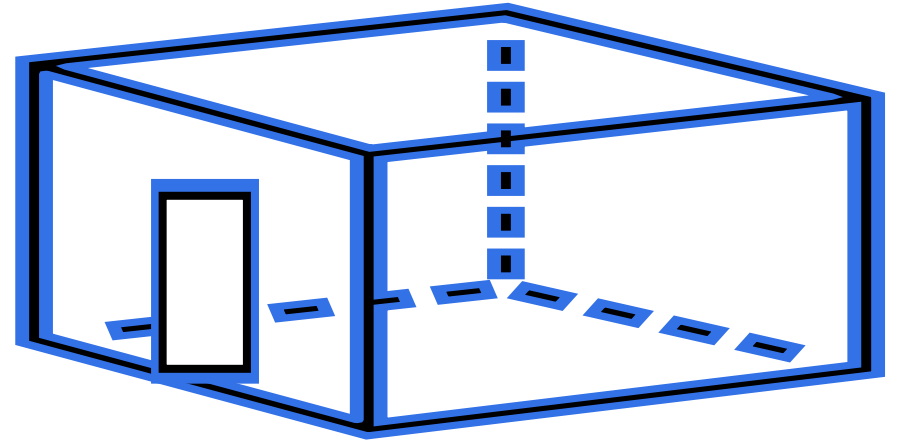


Guidance on Secure Locations

November 8, 2024

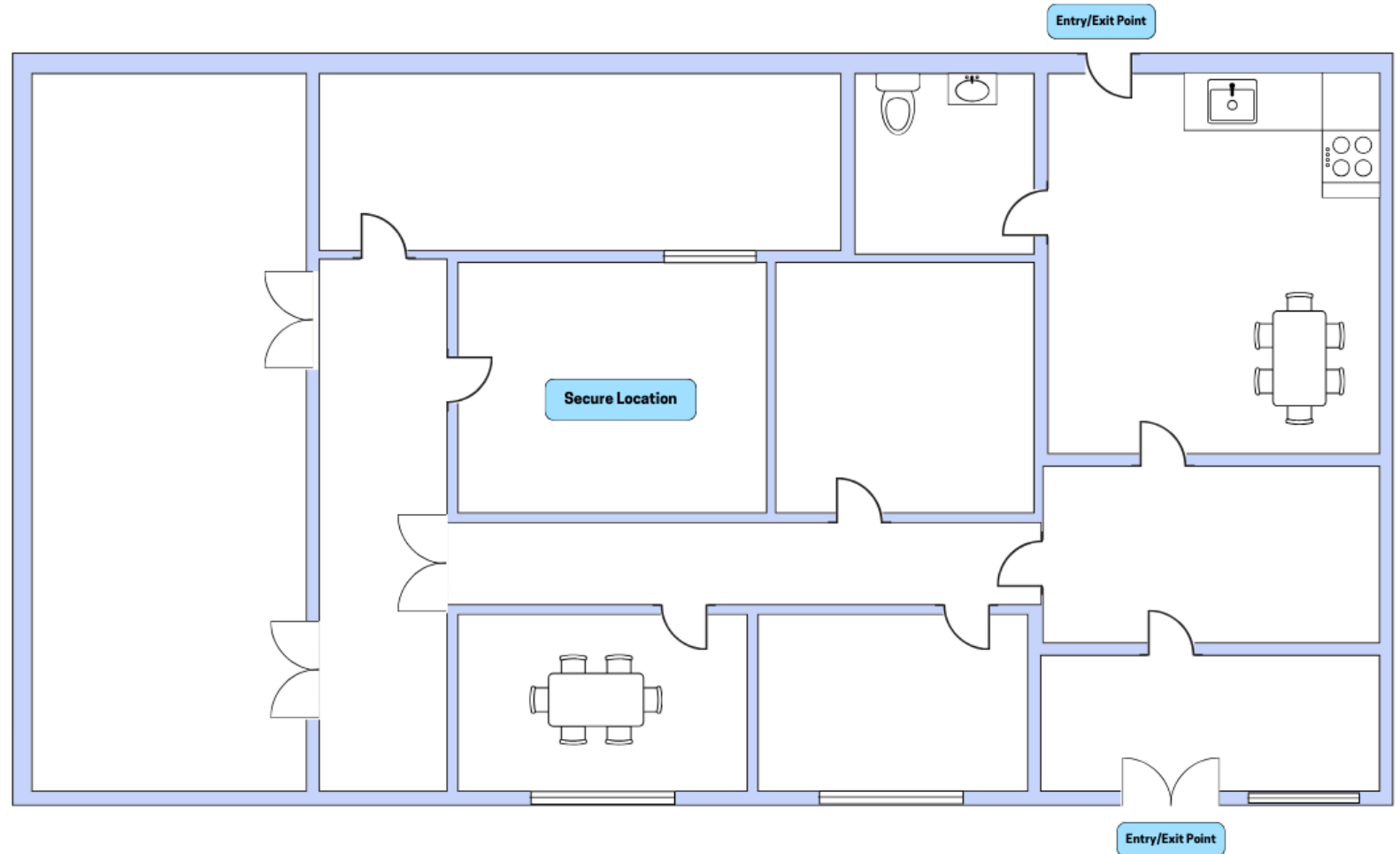
SECURE LOCATION

- At least six sides
 - Each individually evaluated
- Floor and ceilings evaluate for:
 - Who owns the space above and/or below
 - What is access to the space during and outside of business hours
 - What security measures are in place to prevent and detect access



SECURE LOCATION

- Physically and visually distinct area within facility
- Located away from entry or entry point when possible
- External or shared walls may require additional security measures

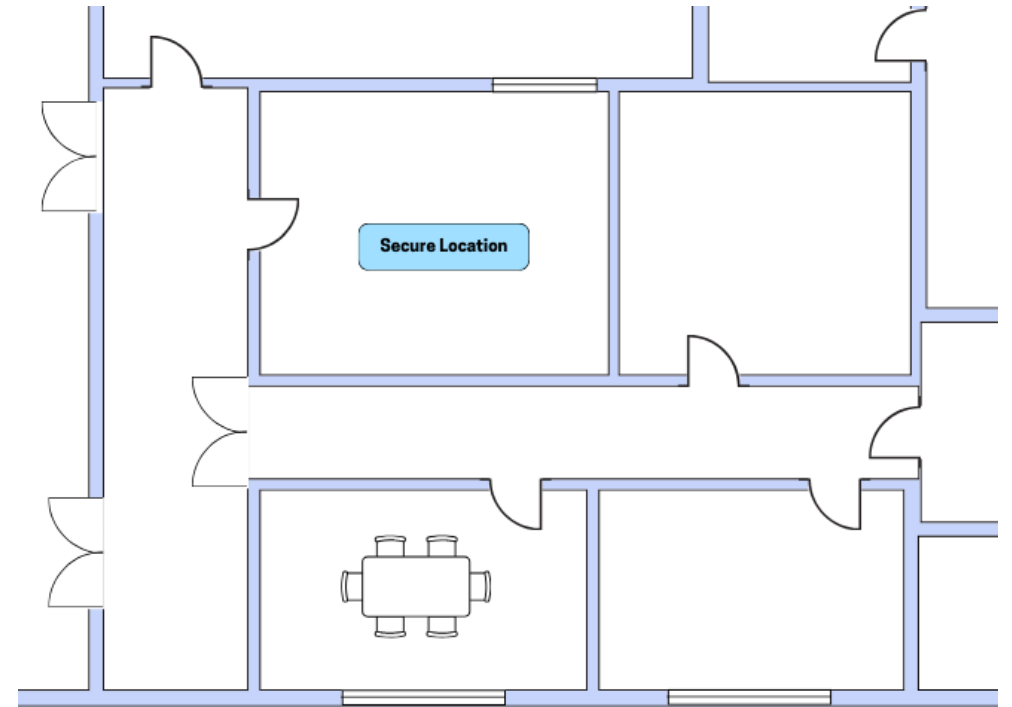


CONSIDERATIONS

- Physical footprint of facility
- Volume of cannabis projected to be handled
 - Large quantities may warrant additional security measures
- Specific security concerns related to the location or layout of facility

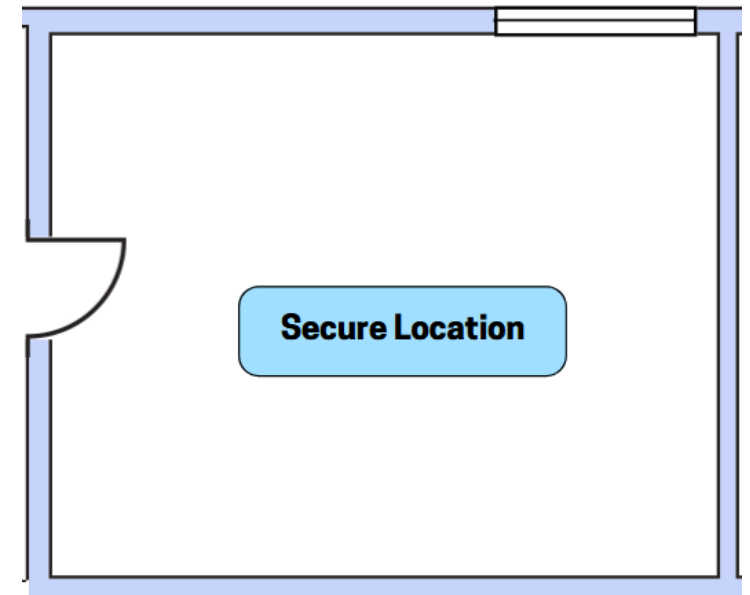
ACCESS TO SECURE LOCATION

- Accessible to the fewest employees required to operate
- Inside of 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
- Equipped with swipe access or other technology to log each individual's access into the Secure Location



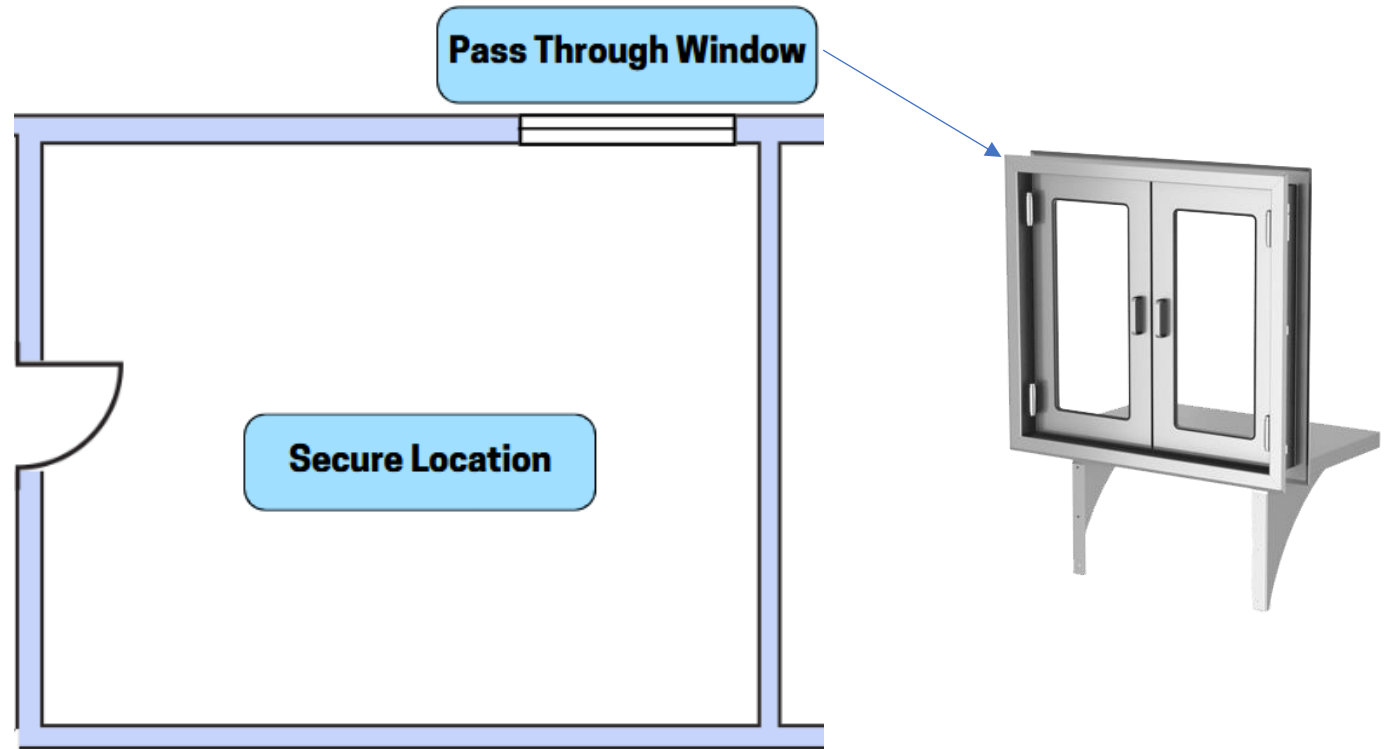
ENTRY POINTS

- Limited to one egress point, with no window access, unless otherwise approved by the DCP
- 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
 - 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.
 - Be secured and separately alarmed overnight to detect unauthorized entrance



PASS THROUGH WINDOW

- Treated as an entry point
- Size of the pass-through window must be limited to the smallest area reasonably necessary to do business



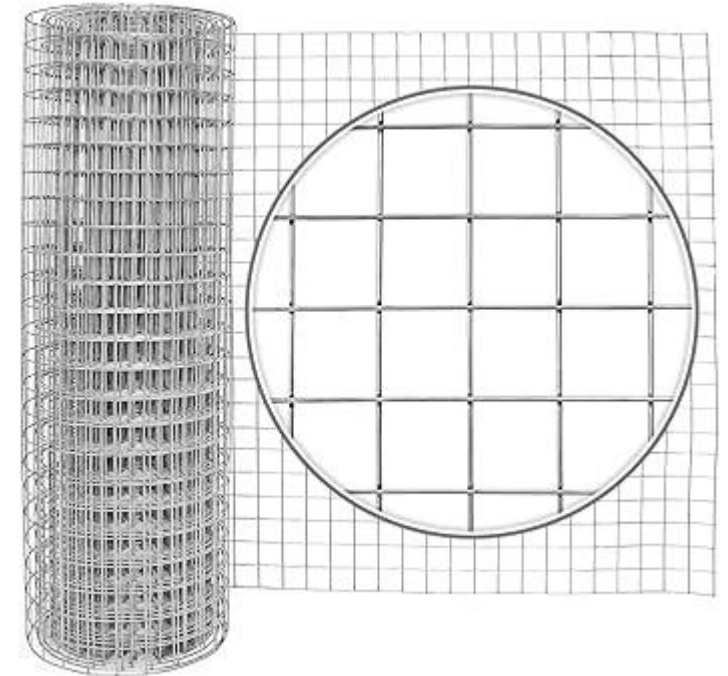
PURPOSE OF SECURE LOCATION

- Provide additional security for long-term and overnight storage of finished goods
- Use of Secure Location to store “work in progress” material is encouraged
 - 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 acceptable, given the totality of the circumstances (i.e. other security features, quantity, desirability and likelihood for diversion, and special processing requirements)
 - Products in their final form, even if not labeled, must be stored in the secure location

Considerations for Different Types of Secure Locations

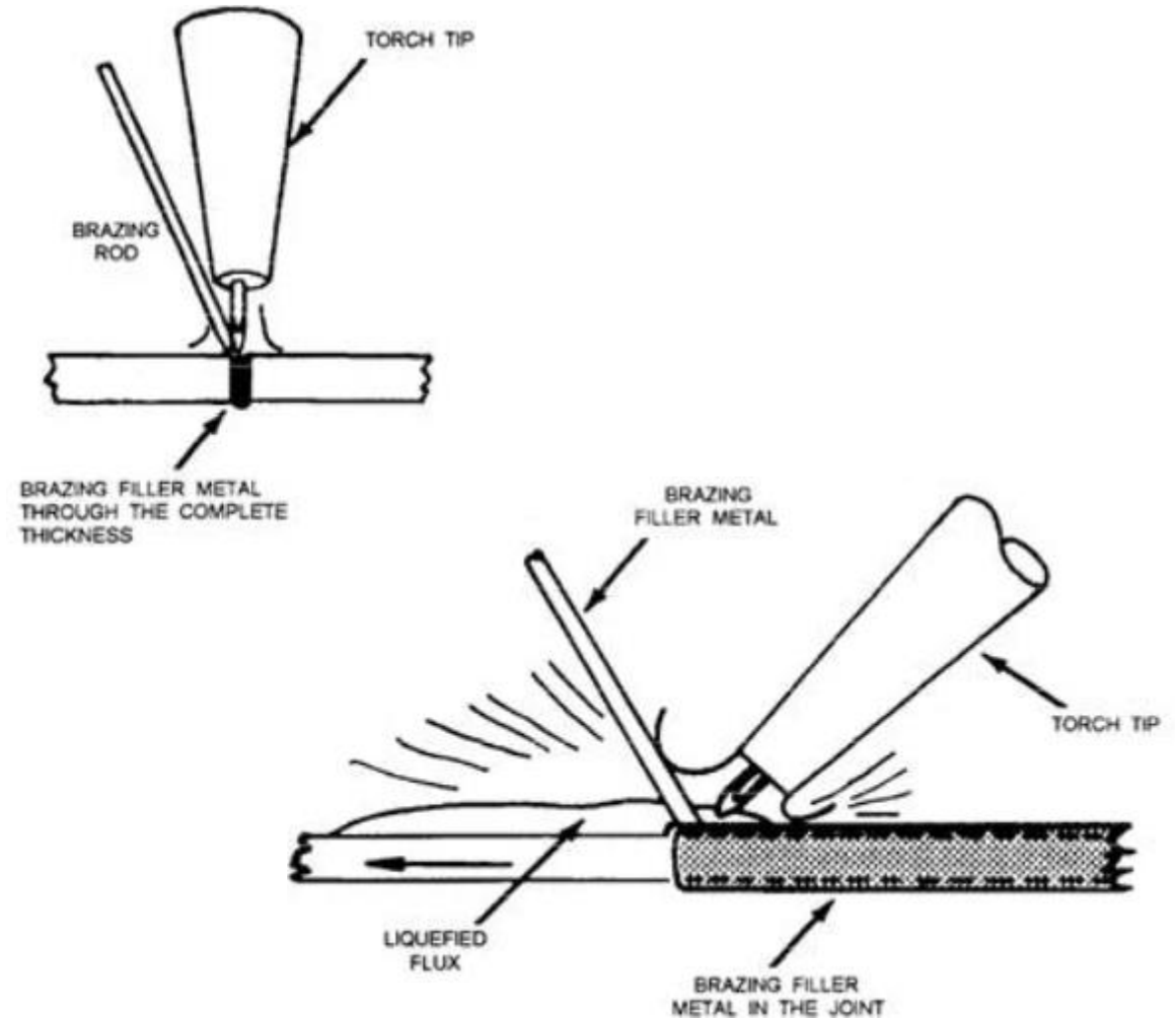
WIRE CAGES OR FREE-STANDING CAGED AREAS/ENCLOSURES

- Sides of the cage or enclosure shall be constructed using 10-gauge wire mesh or thicker or, if using another material, the structural equivalent.
- 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.



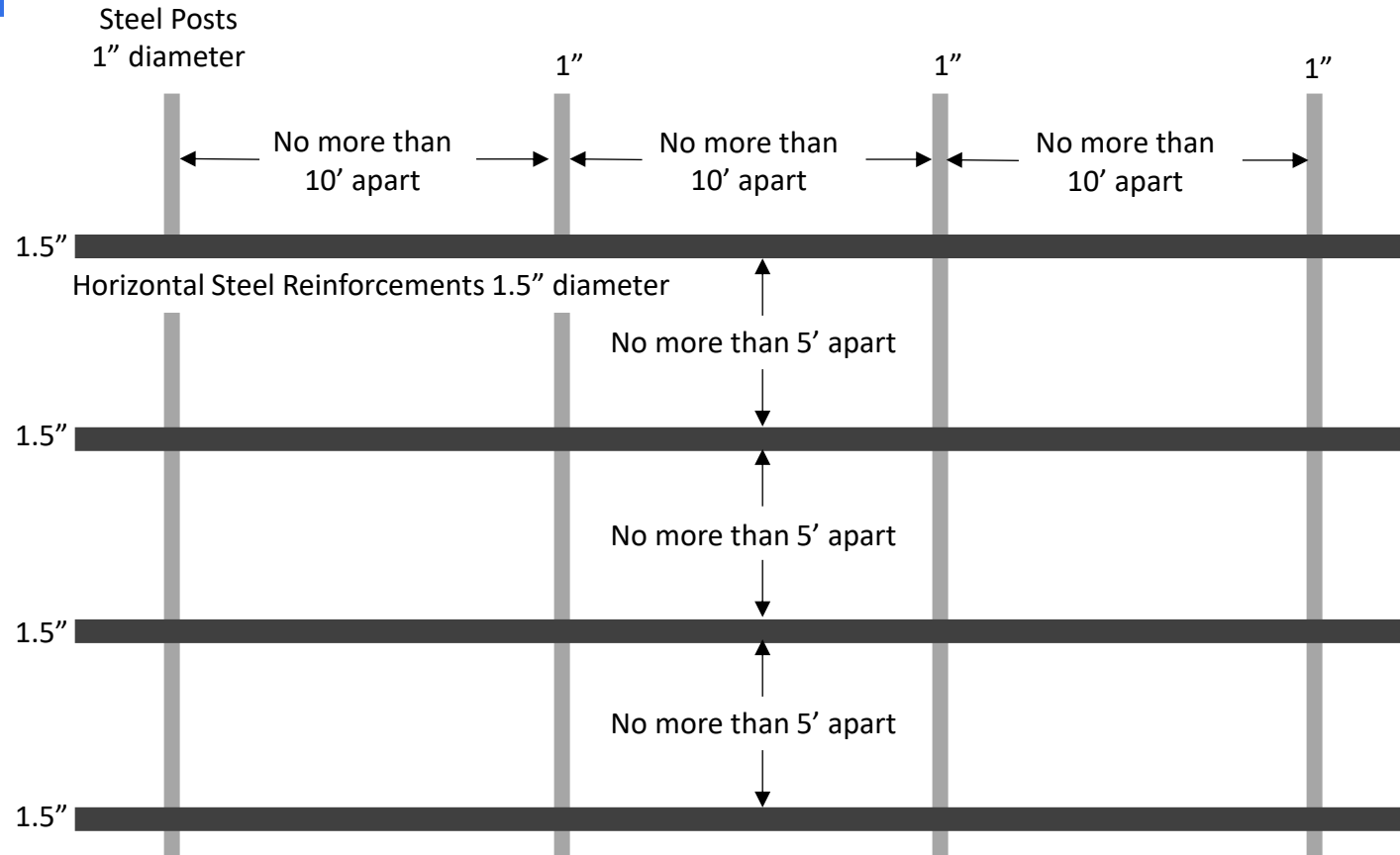
WIRE CAGES OR FREE-STANDING CAGED AREAS/ENCLOSURES

- All wire cage attachment points shall be secured to prevent disengagement. Acceptable methods include, but are not limited to, brazing, pinning or another similar process or technology sufficient to limit disengagement of the attachment points.



WIRE CAGES OR FREE-STANDING CAGED AREAS/ENCLOSURES

- Steel posts no less than 1" in diameter and no farther than 10' apart.
- 1.5" steel horizontal reinforcement no farther than 5' apart.
- 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

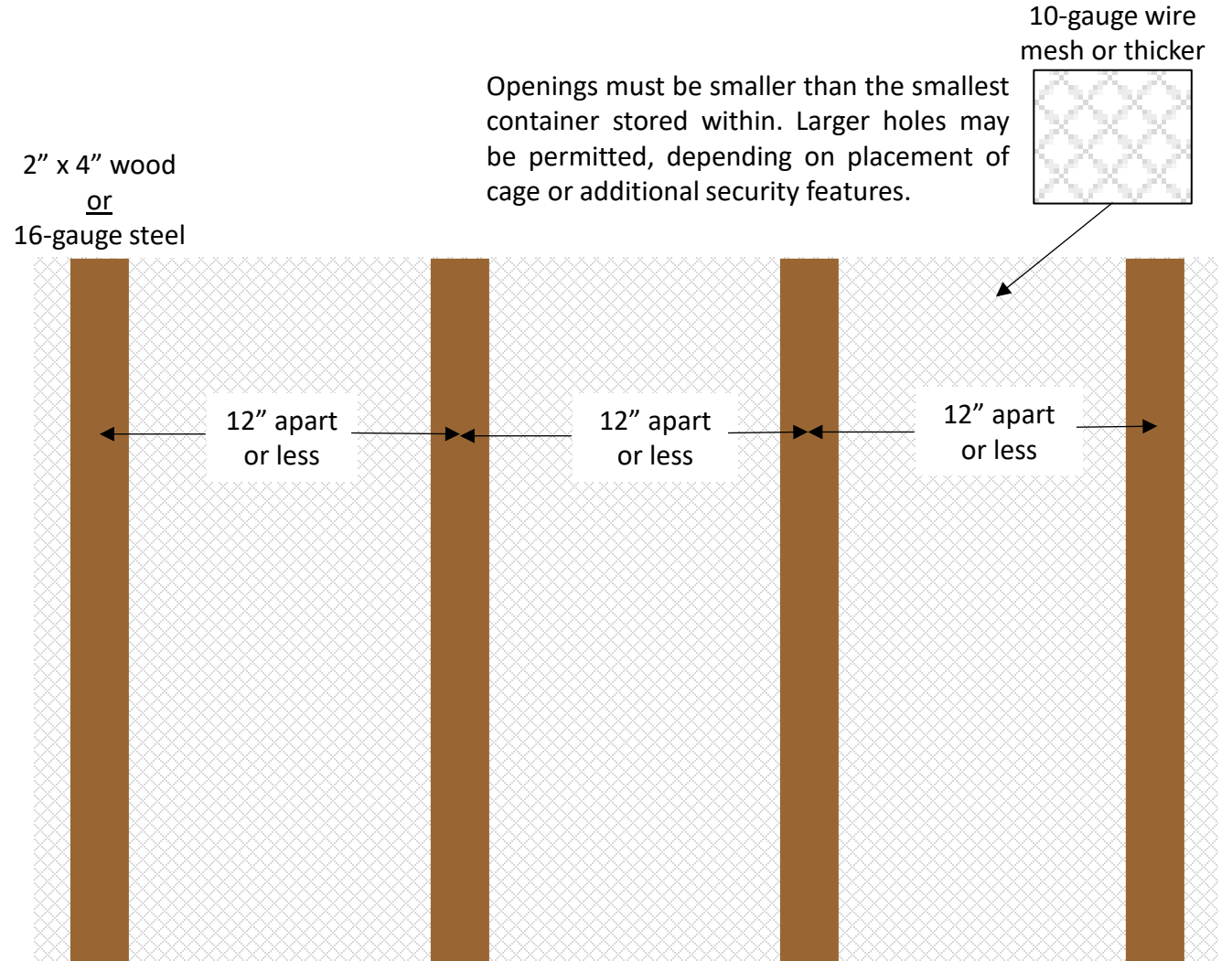
- The walls shall be fortified using 10-gauge wire mesh or thicker or, if using another material, the structural equivalent. The mesh or equivalent material must only be overlapping along a stud and must be affixed to the interior section of the wall.
- Openings must be smaller than the smallest container stored within. Larger holes may be permitted, depending on placement of cage or additional security features.

CUSTOM-BUILT SECURE ROOM

- 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, brazing, pinning or another similar process or technology sufficient to limit disengagement of the attachment points.
- All studs should be at minimum 2" x 4" wood or 16-gauge steel, set 12" apart on center or less.

CUSTOM-BUILT SECURE ROOM

- Walls fortified using 10-gauge wire mesh or thicker or, if using another material, the structural equivalent.
- 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-421I (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.