
Public Comment on Multi-Batch Product Regulations – Sunderstorm Bay LLC (KANHA)

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To [cac@cannabis](mailto:cac@cannabis.ca.gov) <cac@cannabis.ca.gov>

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Dear Cannabis Advisory Committee Members,

On behalf of Sunderstorm Bay LLC (KANHA), licensee in CA (DCC-10004737, C11-0001458-LIC) I am submitting the attached public comment letter in strong support of the proposed multi-batch product regulations that will be discussed at the upcoming August 28, 2025 meeting.

As one of California's leading licensed cannabis manufacturers, we believe this regulatory update is a critical and sensible step forward for consumer choice, operational efficiency, and industry sustainability while maintaining the highest compliance and testing standards.

Please find our full letter attached below for your review and consideration.

Thank you for your time and commitment to shaping the future of California's cannabis industry.



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To the Cannabis Advisory Committee and the Department of Cannabis Control,

On behalf of Sunderstorm Bay LLC (KANHA), one of California's leading licensed cannabis manufacturers, I am writing to express our strong support for the adoption of multi-batch product regulations.

As a manufacturer committed to compliance and innovation, we have long recognized the gap between consumer demand and what the current single-batch packaging rules allow.

Consumers increasingly seek variety, discovery, and convenience in cannabis products; experiences that are commonplace in other industries, but unnecessarily restricted in California's current regulatory framework.

Why Multi-Batch Products Matter

Expanding Consumer Choice

Multi-batch rules would allow KANHA to offer curated variety packs of finished products, giving consumers the freedom to explore multiple SKUs in a single purchase. Instead of being limited to buying one item at a time, customers could enjoy a thoughtfully packaged assortment, such as several distinct gummy SKUs, each already manufactured, batch-tested, and fully compliant.

Similarly, retailers could expand their offerings with sampler packs of flower, pre-rolls, or concentrates, enabling consumers to try a range of products in a safe, transparent, and convenient way. This simple regulatory adjustment unlocks innovation while directly meeting consumer expectations.

Improving Operational Efficiency & Reducing Waste

Under current single-batch rules, manufacturers are forced into inefficient packaging and inventory management practices. This often results in excess packaging, redundant testing logistics, and at times the unnecessary destruction of safe cannabis goods.

Allowing multi-batch products would:

- Enable more flexible use of existing inventory.
- Cut down on wasted packaging materials.
- Reduce product loss while still maintaining compliance.

This not only strengthens businesses like Sunderstorm but also aligns with California's broader goals of sustainability and resource efficiency.

Maintaining Compliance Integrity & Consumer Safety

We recognize that testing, labeling, and traceability are the backbone of consumer safety. Multi-batch rules can fully uphold these standards:

- Every product within a variety pack would still be individually tested for potency and contaminants.
- All items would remain traceable in METRC to their source batch.
- Packaging and labeling can be designed to clearly disclose batch information and product details for consumer transparency.

In this framework, consumer safety is never compromised but the system becomes more flexible and reflective of real-world consumer preferences.

Industry-Wide Benefits

While KANHA would benefit directly, we believe this regulatory update will strengthen the entire California cannabis market. Smaller operators and craft producers will gain new ways to reach consumers through creative assortments. Retailers will see higher sales and improved customer retention by offering products that mirror the variety and accessibility consumers expect from modern retail.

Ultimately, multi-batch rules will help reposition California once again as a leader in cannabis innovation, showing how regulatory integrity and market evolution can go hand in hand.

As one of California's most trusted cannabis manufacturers, KANHA has always prioritized compliance, innovation, and consumer safety. The adoption of multi-batch product regulations represents a necessary and forward-looking adjustment that will allow our company, and the broader industry, to better serve consumers, reduce waste, and continue to grow responsibly.

We strongly urge the Cannabis Advisory Committee and the Department of Cannabis Control to advance this regulatory update. It is a sensible, safe, and urgently needed step that will benefit not just manufacturers and retailers, but consumers and the State of California as a whole.

Respectfully submitted,

Logan Feldstein

VP of Compliance & Licensing

Sunderstorm Bay LLC (KANHA)

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