

STATE OF
COLORADO

LED_Rulemaking - DOR, DOR <dor_led_rulemaking@state.co.us>

LAG Marketplace Subgroup

1 message

Karen Hertz <khertz@holidailybrewing.com>

Thu, Apr 27, 2023 at 10:26 AM

To: "LED_Rulemaking - DOR, DOR" <dor_led_rulemaking@state.co.us>

As the Small Brewery Representative for the LAG Marketplace Structure Subgroup, I have been asked to submit the following:

Liquor Manufacturer Rights Document Attached: A document clarifying the licensing differences between spirits, wine and beer (*please note that if within a cell it does not say yes, then it is not allowed)

Multiple tasting rooms to one license proposal

- I propose beer to have the option to obtain as many as five licenses in addition to their primary location.
- The number of five licenses is aligned with limited wineries.
- In line with the limited wineries, allow the five additional beer tasting rooms to brick and mortar or temporary locations.
- Three week notification would be required for temporary locations.

Noncontiguous proposal

- I propose breweries be allowed (if approved by the TTB) to have a manufacturing location within 10 miles under the same license.
- This is currently allowed with wine.

Franchise law proposal

- I propose the removal of **C.R.S. 44-3-408** (termination of wholesalers).
- Beer is the only category subject to this law.
- Both wine and spirits manufacturers utilize wholesalers without the need for additional restrictions beyond normal contract laws and without any detriment to wholesalers, retailers or consumers.
- As one of the goals for this group is to modernize the current laws, this unnecessary regulation on beer is outdated and creates inequalities in the market.
- This would not remove the requirement to continue to utilize wholesalers.

Thank you,

Karen Hertz | *Chief Brewista*

HOLIDAILY BREWING CO.

America's Dedicated Gluten-free Brewery

801 Brickyard Circle Unit B Golden, CO 80403

720-530-3593 | www.holidailybrewing.com



 **Liquor Manufacturer Rights (1).pdf**
52K