



Sensible policies, safer communities.

---

Representative Tina Liebling, Chair  
Health Policy and Finance Committee  
477 State Office Building  
St. Paul, MN 55155

Re: House File 3595 (Edelson)  
Cannabinoid product regulation provided

Dear Chair Liebling and members of the Health Policy and Finance Committee,

I write today on behalf of Sensible Change Minnesota, with general support of House File 3595. Sensible Change Minnesota is a non-profit that believes our communities are safer when we create sensible drug policies. We are a patient and consumer led and run organization and have spent much of the past several years improving Minnesota's medical cannabis program and advocating for safer drug policy.

Over the past seven years, we have testified to this committee about the high cost of medical cannabis. One thing we haven't talked much about is how patients are supplementing the expensive medical cannabis products with certain hemp derived cannabinoid products, readily available in shops all over the state and over the internet, which are often more effective than the medical cannabis products. However, what we have also seen, is bad players in the hemp industry selling untested, unregulated products to consumers who don't know any better. This impacts hundreds of thousands of patients and consumers throughout the state.

That is why stronger regulation is needed – to weed out the bad players. *Pun intended.*

We thank Representative Edelson, Dr. Cody Wiberg with the Minnesota Board of Pharmacy, and others who have worked hard on a regulatory framework to protect consumers. We are, however, concerned about the unnecessary inclusion and ambiguity of the word "non-intoxicating" found in Minn. Stat. 151.72, and any hemp derived tetrahydrocannabinol products currently on the market that would not be regulated under this framework. What we would prefer to see is a definitive definition of "intoxicating" to be products with over 0.3% delta-9 tetrahydrocannabinols by weight – similar to how we define "intoxicating liquor" as being over 3.2% alcohol by volume.

Addressing the regulation of products – including tetrahydrocannabinol products – already readily available from brick-and-mortar stores, and online hemp retailers, is not full legalization. It is an important step to ensuring consumers are safe.

While we have not yet seen what HF3595 will look like as the Committee considers it, the Minnesota Cannabis Association has worked closely with us as consumer advocates, to ensure the

regulatory proposal they put forward meets the needs of consumers. In fact, that proposal incorporates all the advice we received from our subject matter experts, who consult worldwide on cultivation, processing, and testing of cannabinoid products.

Sensible Change Minnesota hopes that the House carefully considers which products it is regulating, and which products it is sending back to the illicit market. Minnesota has an opportunity to protect consumers, by working with consumer advocates and the local industry, to ensure all of these products are appropriately regulated. Ideally, Minnesotans are buying safe, tested, and appropriately labeled products from Minnesota businesses – something that might not be possible with possible tetrahydrocannabinol limits that go above and beyond what is permitted under federal law.

We appreciate the opportunity to provide comment on this bill, and are supportive of the regulations proposed, but advocate for a definition of “nonintoxicating” to be under 0.3% delta-9 tetrahydrocannabinol and aligning what is permitted for sale in Minnesota with the federal law.

Respectfully,



Maren Schroeder  
Policy Director, Sensible Change Minnesota