

VETERANS INITIATIVE 22

Because We C.A.R.E

Testimony on Maryland Senate Bill 021:

TO: Senator Pamela Beidel Chair, Senate Finance Committee and Committee members

FROM: Shanetha Lewis, Veterans Initiative 22, Executive Director

DATE: 01/28/2025

BILL: SB0214

POSITION: **Unfavorable**

Veterans Initiative 22 is a 501(c)(3) non-profit organization that focuses on helping Veterans, Family and First Responders by providing resources, employment opportunities, and continuously advocating for rights and access to affordable cannabis and Veteran rights. VI 22 was named as such after the estimated 22 Veterans who commit suicide daily due to PTSD, and it is our organization's goal to bring national awareness to this tragedy, while also working to improve the lives of Veterans across the country.

Please note our strong **opposition** for this bill. For the following reasons:

I am writing to express my opposition to Senate Bill 214, which seeks to regulate the sale and distribution of tetrahydrocannabinol (THC)-containing products. While the bill's intent to establish controls on cannabis-related commerce is understandable, several issues with its provisions warrant reconsideration and amendment.

1. Overbroad Definitions of Prohibited Cannabinoids

The language in **36-1102(a)(3)(ii) and (iii)**, which defines prohibited substances, is overly broad and grants excessive discretion to the Administration. Specifically:

- **(ii)** The exclusion of cannabidiol (CBD) but prohibition of "any other cannabinoid" deemed intoxicating by the Administration raises concerns about transparency and accountability. The bill does not provide clear criteria or mechanisms for determining which cannabinoids are intoxicating. This ambiguity could lead to arbitrary or inconsistent enforcement and risks stifling research and innovation in cannabinoid-based therapies.
- **(iii)** The prohibition of "any chemically similar compound, substance, derivative, or isomer of THC" is excessively restrictive. Many non-intoxicating cannabinoids and derivatives, such as THC isomers with potential therapeutic benefits, could be

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unfairly banned under this provision. This overly cautious approach ignores scientific advancements and the nuanced effects of various cannabinoids, potentially blocking access to products that offer health benefits without significant intoxication.

2. Adverse Impact on Licensed Hemp Businesses

The stringent THC restrictions and broad definitions of prohibited cannabinoids could disproportionately harm licensed hemp businesses. Small businesses in particular may struggle to comply with these requirements, which would necessitate reformulating products, redesigning packaging, and potentially losing market share to unregulated operators.

3. Enforcement Challenges and Overreach

Provisions allowing the Field Enforcement Division to confiscate products and issue citations based on non-compliance with THC thresholds and cannabinoid definitions create significant enforcement challenges. These measures risk targeting small businesses disproportionately and could lead to confusion and inconsistency in enforcement.

4. Lack of Scientific Basis

The thresholds and definitions established in this bill lack a clear scientific basis. Decisions regarding THC limits and the classification of cannabinoids should be informed by robust evidence, including pharmacological research and data from other regulated markets, to ensure that regulations balance consumer safety with accessibility.

Recommendations

To address these concerns, I urge legislators to consider the following amendments:

- Revise **36-1102(a)(3)(ii) and (iii)** to:
 - Define clear, evidence-based criteria for determining which cannabinoids are intoxicating.

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- Exclude non-intoxicating cannabinoids and derivatives with demonstrated therapeutic potential from prohibition.
- Require stakeholder input, including scientific experts, patients, and industry representatives, in determining cannabinoid classifications..
- Include provisions for consumer education rather than relying solely on punitive measures to achieve compliance.

In its current form, Senate Bill 214 risks harming patients, stifling industry growth, and undermining the legal cannabis market. I respectfully urge lawmakers to reconsider these provisions to better align the bill with public health goals, scientific evidence, and industry standards.

Thank you for the opportunity to provide input. I am confident that with the proposed clarification, SB0214 will better serve Maryland's cannabis community and industry. Again I thank you for your time in reading my testimony and for your consideration of my position. Cannabis is medicine and unrestricted affordable access to cannabis improves and saves lives!

We urge a unfavorable report on [SB0214](#).

Thank You,

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