Dear Senator Feldman and members of the Senate Finance Committee,

This written testimony is put forward on behalf of the Maryland Healthy Alternatives Association. Our association represents businesses from every segment of the hemp industry and is committed to protecting the public's access to safe alternatives to prescription medications.

Firstly we want to thank you for your interest in the issues laid out in SB788. We look forward to working with you to establish a regulatory framework for hemp products that serves to protect consumer safety and the continued growth of the Maryland hemp industry. We are submitting this letter to request an amendment to the language of the study in order to have our association added as an equal contributor to the working group.

We agree that the hemp industry as a whole is in need of a regulatory framework that focuses on age gating and testing standards and believe that we can be of assistance in creating that framework as we have already been operating responsibly in these areas for years.

The language in the original draft of this legislation could require all consumers of these products to retain a medical marijuana card and recommendation to be able to purchase these products regardless of personal circumstances that prevent the procurement of the MMCC card. Additionally this bill could only allow these products to be sold at Maryland Medical Cannabis Dispensaries and could in effect place all current retailers out of business as well as totally remove the public's access to these products as medical marijuana dispensaries have no interest in the sale of hemp-derived products.

We want to be able to both ensure public safety while protecting this industry's ability to provide safe access to these products that help people improve their quality of life. Consumers of the products in question are much different from the average medical marijuana patient. These consumers are attracted to the fact that these products are significantly less potent than medical marijuana products. Delta 8 THC is 40-50% less psychoactive than medical marijuana and that is the primary reason why people purchase them.The average consumer of Delta 8 is more in line with the traditional CBD consumer than they are with a medical marijuana patient. Additionally there are many circumstances that prevent Marylanders from acquiring an MMCC card. Many employers do not allow their staff to obtain an MMCC card; many of these people work in healthcare and unions, and others who do not desire to have their medical marijuana status be made public. Additionally and most importantly there are a massive group of

these consumers who have no desire to be medical marijuana patients. Many of these people do not have the funds or the capability to acquire a medical marijuana card and could immediately lose their access to the products that have helped them improve the quality of their daily lives. We as producers and retailers of these products are a resource to these underserved communities. They are wonderful people and they come from all walks of life. Here are just 2 of the many customer testimonials we received when this legislation was first introduced. These 2 testimonials can serve as a snapshot of so many other Marylanders and their reliance on these hemp products.

My name is Hillary and I am a 29 year old mom, wife and lupus warrior. I was put on Oxycodone by a pain management doctor when I was in my early 20s due to the excessive damage to my muscles, joints, and nerves from my health issues. I have POTS, degenerative disc disease, small fiber neuropathy, Sjögren's syndrome, PTSD, generalized anxiety disorder and major depressive disorder that have all contributed to being disabled for the last 10 years. I stayed on various opioids 3 to 4 times a day for 7 years, even while pregnant, just to survive every day and be able to walk around my house. I was miserable and feared waking up and facing the pain every day.

In the summer of 2021 I decided I wanted to try living with the pain without opioids before my 30th birthday and started researching CBD. I came across Embrace Wellness CBD and it was close by so I visited their store. They were able to educate me on the various products and options I had. I decided to try their Delta-8 Hemp Carts even though I had not used any cannabis products in 10 years. I felt confident in their testing, ability to provide the third party test results, and the staff's knowledge when I left.

Since using delta-8, I have been able to come off of opioids completely. I am currently 15 weeks without opioids of any kind because of the benefits delta-8 is able to provide me via businesses like Embrace. My liver enzymes are better because I'm not taking so many medications anymore to combat the pain; the delta-8 is actually allowing my liver to rest enough to heal. I sleep better, my muscles are not so tense and painful, and my mood is happy and uplifted now. Having open access to delta-8 has changed my life in the matter of 6 months!. I am not able to get a medical marijuana card because of my husband's job which is a shame and leaves me with minimal options to treat my chronic pain.

Pharmaceuticals can and do help, but there is a big problem with discrimination against chronic pain patients who need to use opioids to control their pain. Meanwhile, there are wonderful, educated, knowledgeable people able and willing to help bring more natural hemp options to those of us with pain, anxiety, depression, etc. Delta 8 can help us fight pain and anxiety without being high, without poisoning our bodies and without risking addiction. Please do not take away one of the only legal natural alternatives we have!

Hillary C.

Delegate Pena-Melnyk, and Senator Feldman

My name is Frank and I am 75 years old. I reside in Eldersburg, Maryland and am a retired limousine driver. I worked for many years as a truck driver and suffered a terrible work-related back injury dating back nearly 20 years. I have had multiple back surgeries and was on Hydrocodone for decades. I began wanting to get off of the pain medication about a year ago as I knew it was not good for my body, specifically my liver, and in my older age I knew I could not continue to take these prescription drugs for much longer. I decided to quit taking the pills cold turkey which was not easy. As a result, due to horrible withdrawals from the Vicodin, I had been unable to sleep at all. I began looking into CBD for help with my pain and to help me sleep but it was not helping much. Then I visited Embrace CBD Wellness Center in Glen Burnie and was introduced to Delta 8. I was thoroughly educated by the staff there and was shown a lab test that showed that it was a clean product and that put me at ease. I'm an older guy so all of this is very new to me but this product has been the only thing that has allowed me to get a good night's sleep. At first I was extremely skeptical, and to be honest, was totally against it as I am not someone who ever wanted to use anything even remotely related to THC. I do not like marijuana, I never have, but these delta 8 products work. I am finally able to sleep which has drastically improved my life.

As a retiree on a fixed income, I cannot afford a medical marijuana license and am also quite afraid of using marijuana as it will be too strong for me. I do not like smoking and I am too old to walk around high. The intoxication I feel from delta 8 is very mild and manageable for me as someone with zero experience with any products like these. I have grown to rely on this product for pain management and sleep. Please do not take away my access to these products as they are the only thing keeping me off of opiates and helping me sleep.

Sincerely,

Frank P.

The Senator's newsletter states that these products are being sold to minors without any testing requirements or restrictions and there is certainly some truth to that. We appreciate that the Senator has shown interest in fixing this problem. Responsible and ethical companies like the ones represented by our association have held ourselves to the highest possible standards as it relates to testing and quality control. We use DEA registered 3rd party laboratories to do full panel lab tests on all of our raw ingredients and finished products. We go beyond the MMCC requirements by using food grade toxicology labs to do additional foreign materials analysis and reagent testing which is in addition to the potency, mycotoxins, heavy metals, pesticides, and residual solvents analysis. Hemp industry professionals take testing very seriously and go far beyond the MMCC. The 3 MMCC approved labs do not have the capacity to be able to do the type

of testing that the hemp industry does and as a result this bill would not have achieved its stated purpose. We have set the testing standards, we have the model for the best possible regulation of these products. We are just asking to be let into the conversation. We can help our representatives push this industry forward while protecting the public, especially the children, from harm due to untested and fraudulent products. We agree that we need to keep these products out of the hands of minors, but the stores represented by our association have an age requirement of 21 to enter and make purchases. These products being sold in gas stations and convenience stores are contributing to these products landing into the hands of minors. There is a better way to go about this that would not cause our industry so much loss and inflict so much unnecessary damage on its participants. Simple. We must stop allowing irresponsible retailers to sell it in places that minors have unfettered access to and allow businesses who are responsible to continue to operate by selling these federally legal and fully compliant, thoroughly tested products to those 21 and older to be able to use as alternatives to prescription medications and to improve the quality of their lives. Again, we want regulation, we just want it the right way. Below you will see an example of the type of testing that the hemp industry has the capacity to do.

First you will find chain of custody documents that track and verify product origin, then a lab test for the hemp grown to be extracted to cbd, a lab test for the cbd extracted and a full panel lab test for the Delta 8 made from the cbd.

1/13/2021

CHAIN OF CUSTODY

This letter certifies that Batch No. 817-12-1 of Delta-8 oil has been processed from hemp and CBD Isolate that complies with all applicable laws. The test results for both the hemp and CBD use to make Batch No. 817-12-1 are attached to this letter.

Informational Use Only
Not For Regulatory Use

Certificate of Analysis

Juniper Analytics LLC
1334 NE 2nd St
Bend, OR
(541) 382-3796
http://www.juniperanalyticsllc.com
ORELAP: License # 4101-001

Sample: 20JA0873.01

Hemp Potency - Not for Compliance -CAN, MC

Report Date: 5/27/2020
Intake Date: 05/21/2020
Harvest/Prod. Date:

METRC Sample: ; METRC Batch #: ;
External Batch #: ; Analytical Batch #: PO-2020-05-22-02

<LOQ	**8.038%**
Total THC %	Total CBD %
<LOQ	**80.38 mg/g**
Total THC mg/g	Total CBD mg/g

Pesticides	Not Tested
Water Activity	Not Tested
Moisture Content	Pass

See attached sheets for details

Ben Armstrong
QA Review

Informational Use Only
Not For Regulatory Use

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Bend, OR
(541) 382-3796
http://www.juniperanalyticsllc.com
ORELAP: License # 4101-001

Sample: 20JA0873.01

Hemp Potency - Not for Compliance -CAN, MC

Report Date: 5/27/2020
Intake Date: 05/21/2020
Harvest/Prod. Date:
Potency Analysis Date: 05/26/2020

METRC Sample: ; METRC Batch #: ;
External Batch #: ; Analytical Batch #: PO-2020-05-22-02

Cannabinoid Profile

<LOQ	8.038%
Total THC	Total CBD
<LOQ	**80.38 mg/g**
Total THC mg/g	Total CBD mg/g

Analyte	LOQ	Mass	Mass
	mg/g	%	mg/g
THCa	1.050	0.317	3.17
Δ9-THC	1.050	<LOQ	<LOQ
Δ8-THC	1.050	<LOQ	<LOQ
THCV	1.050	<LOQ	<LOQ
CBDa	1.050	8.953	89.53
CBD	1.050	0.187	1.87
CBN	1.050	<LOQ	<LOQ
CBGa	1.050	0.244	2.44
CBG	1.050	<LOQ	<LOQ
CBC	1.050	<LOQ	<LOQ
Total		**9.700**	**97.00**

QC Batch ID: PO-2020-05-22-02
Total THC = THCa * 0.877 + Δ9-THC
Total CBD = CBDa * 0.877 + CBD
Instrument: HPLC/DAD; Method: JA-Potency-Proprietary; LOQ = Limit of Quantitation; The reported result is based on a sample weight with the applicable moisture content for that sample; Unless otherwise stated all quality control samples performed within specifications established by the Laboratory. Potency Analysis (Oregon Compliance Standard OAR 333-007-0430).

Ben Armstrong
QA Review

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ORELAP: License # 4101-001

Sample: 20JA0873.01

Hemp Potency - Not for Compliance -CAN, MC

Report Date: 5/27/2020
Intake Date: 05/21/2020
Harvest/Prod. Date:
Moisture Analysis Date: 05/26/2020
Water Activity Analysis Date:

METRC Sample: ; METRC Batch #: ;
External Batch #:

Moisture Content / Water Activity

Pass
10.45%
Limit: 15.00%
Moisture

Not Tested
NaN aw
Limit: 0.65 aw
Water Activity

Instrument: Aqua Lab Water Activity Meter. Water Activity and Moisture Content (Oregon Compliance Standard OAR 333-007-0420)
Instrument: Sartorius MA37 Electronic Moisture Analyzer

Ben Armstrong
QA Review

ORELAP Cert No. 4092-005
OLCC No. 1002158CD2E

Oregon Compliant Marijuana Potency Analysis by High Performance Liquid Chromatography

Testing Accreditation #: 4092-005

Test Certificate #: 127371-001

Client Name, Sample Details

Sample: Isolate
License:
Type: Extract
Method: FE04U HPLC-UV

Test Conditions
Prepsheet ID#: MIP201022
Scale: XS205-OR1
Analyst: HRM
Technician: TMR

Sample ID#: 127371
Lot #: -20-70i
Batch #: 127371
Harvest/Process Date: 10/26/2020
Date Received: 10/26/2020
Test Date: 10/27/2020

Test Compounds	THC	THCA	CBD	CBDA	CBN	CBG	CBC	THCV*	CBDV	Total Cannabinoids*	Total THC	Total CBD	Calc Max Total Cannabinoids*
Amount (%)	N/D	N/D	110.89	0.26	N/D	N/D	N/D	N/D	0.45	111.60	0.00	111.12	111.12
Amount (mg/g)	N/D	N/D	1108.89	2.59	N/D	N/D	N/D	N/D	4.53	1116.01	0.00	1111.16	1115.69
Amount per Serving (mg)	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	N/D	0.00	**Serving Size~ (g):**		0.00
LOQ (mg/g)	2	2	2	2	2	2	2	2	2		**%Decarb.**	**THC**	**CBD**
±%RPD	0.13	0.07	0.81	0.77	1.35	1.49	0.51	0.82	0.85			N/A	100

LOQ = Limit of Quantitation; %RPD = Relative Percent Deviation; %RSD = Relative Standard Deviation; N/D = Not Detected
*Designates values that are not currently included in the accredited scope of Iron Laboratories.

*** Designates tests that use the method FE-45. FE-45 is performed using AOAC 966.02 and 32.004-32.009. FE-45 has relative expanded (k=2) uncertainties of 1.098% for moisture, 1.754% for water activity for unprocessed plant materials, and 13.102% for water activity for infused products. Vitamin E acetate analysis has a relative expanded (k=2) uncertainty of 18.614%.

Total THC and CBD is the calculated sum of THC or CBD and the amount of THC or CBD derived from THCA or CBDA, respectively. These values are calculated by applying a molar correction factor of 0.877 to the THCA or the CBDA value. Calc Max Total Cannabinoids is the sum of Total THC, Total CBD, CBN, CBG, CBC, THCV, and CBDV.

%Decarb. THC and CBD refer to the percentage of THC or CBD relative to THCA or CBDA, respectively.

SOP FE-01-OR9 was used in accordance with OAR 333-007 for sampling. All marijuana items are sampled and tested in accordance with OAR 333-007-0300 to 333-007-490 and OAR 333-064-0100 to 333-064-0110.

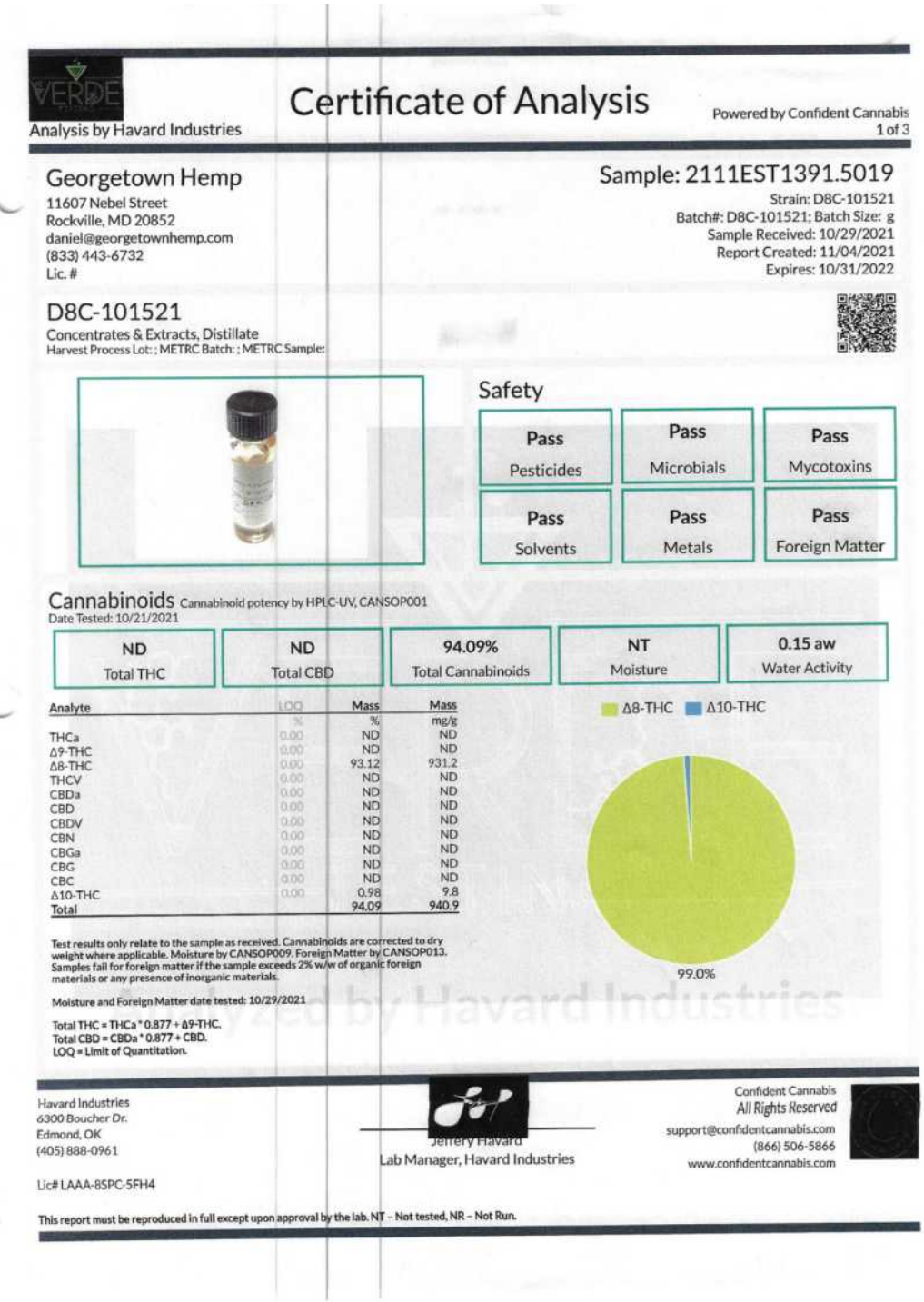
Terry Rabinowitz, Quality Manager

Himashi Mead, Technical Manager

Iron Labs Oregon complies with 2009 TNI Environmental Laboratory Standards.

Tested by Iron Laboratories Oregon, 71 Centennial Loop Suite D Eugene, OR 97401

Full panel 3rd party lab test done by a DEA registered 3rd party laboratory.



VERDE

Analysis by Havard Industries

Certificate of Analysis

Powered by Confident Cannabis
1 of 3

Georgetown Hemp

11607 Nebel Street
Rockville, MD 20852
daniel@georgetownhemp.com
(833) 443-6732
Lic. #

Sample: 2111EST1391.5019

Strain: D8C-101521
Batch#: D8C-101521; Batch Size: g
Sample Received: 10/29/2021
Report Created: 11/04/2021
Expires: 10/31/2022

D8C-101521

Concentrates & Extracts, Distillate
Harvest Process Lot: ; METRC Batch: ; METRC Sample:

Safety

Pass Pesticides	Pass Microbials	Pass Mycotoxins
Pass Solvents	Pass Metals	Pass Foreign Matter

Cannabinoids

Cannabinoid potency by HPLC-UV, CANSOP001
Date Tested: 10/21/2021

ND	ND	94.09%	NT	0.15 aw
Total THC	Total CBD	Total Cannabinoids	Moisture	Water Activity

Analyte	LOQ	Mass %	Mass mg/g
THCa	0.00	ND	ND
Δ9-THC	0.00	ND	ND
Δ8-THC	0.00	93.12	931.2
THCV	0.00	ND	ND
CBDa	0.00	ND	ND
CBD	0.00	ND	ND
CBDV	0.00	ND	ND
CBN	0.00	ND	ND
CBGa	0.00	ND	ND
CBG	0.00	ND	ND
CBC	0.00	ND	ND
Δ10-THC	0.00	0.98	9.8
Total		94.09	940.9

Test results only relate to the sample as received. Cannabinoids are corrected to dry weight where applicable. Moisture by CANSOP009. Foreign Matter by CANSOP013. Samples fail for foreign matter if the sample exceeds 2% w/w of organic foreign materials or any presence of inorganic materials.

Moisture and Foreign Matter date tested: 10/29/2021

Total THC = THCa * 0.877 + Δ9-THC.
Total CBD = CBDa * 0.877 + CBD.
LOQ = Limit of Quantitation.

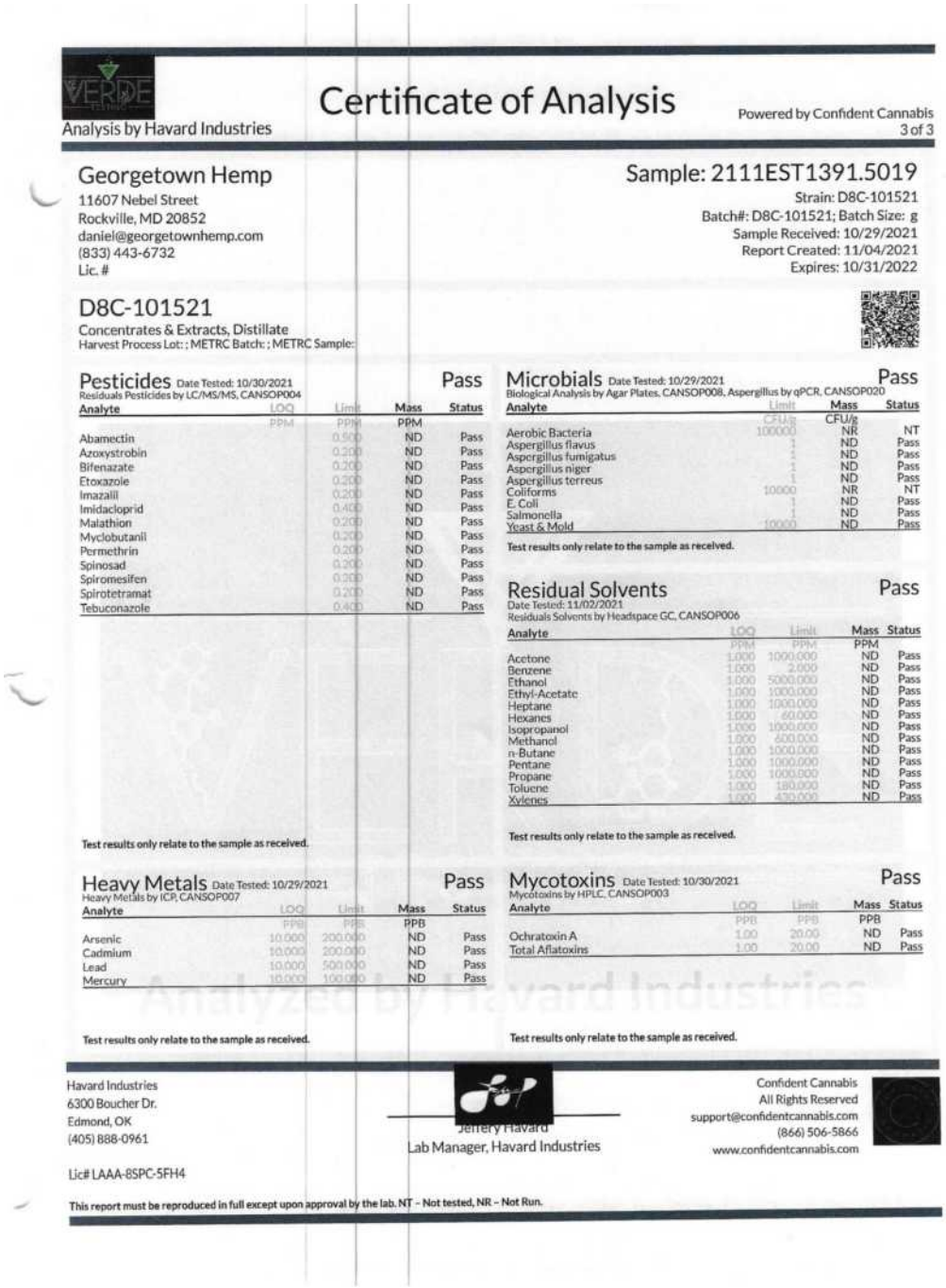
Havard Industries
6300 Boucher Dr.
Edmond, OK
(405) 888-0961

Lic# LAAA-8SPC-5FH4

Jeffery Havard
Lab Manager, Havard Industries

support@confidentcannabis.com
(866) 506-5866
www.confidentcannabis.com

This report must be reproduced in full except upon approval by the lab. NT – Not tested, NR – Not Run.



Certificate of Analysis

Analysis by Havard Industries

Powered by Confident Cannabis
3 of 3

Georgetown Hemp

11607 Nebel Street
Rockville, MD 20852
daniel@georgetownhemp.com
(833) 443-6732
Lic. #

Sample: 2111EST1391.5019

Strain: D8C-101521
Batch#: D8C-101521; Batch Size: g
Sample Received: 10/29/2021
Report Created: 11/04/2021
Expires: 10/31/2022

D8C-101521

Concentrates & Extracts, Distillate
Harvest Process Lot: ; METRC Batch: ; METRC Sample:

Pesticides

Date Tested: 10/30/2021
Residuals Pesticides by LC/MS/MS, CANSOP004

Pass

Analyte	LOQ	Limit	Mass	Status
	PPM	PPM	PPM	
Abamectin		0.500	ND	Pass
Azoxystrobin		0.200	ND	Pass
Bifenazate		0.200	ND	Pass
Etoxazole		0.200	ND	Pass
Imazalil		0.200	ND	Pass
Imidacloprid		0.400	ND	Pass
Malathion		0.200	ND	Pass
Myclobutanil		0.200	ND	Pass
Permethrin		0.200	ND	Pass
Spinosad		0.200	ND	Pass
Spiromesifen		0.200	ND	Pass
Spirotetramat		0.200	ND	Pass
Tebuconazole		0.400	ND	Pass

Test results only relate to the sample as received.

Microbials

Date Tested: 10/29/2021
Biological Analysis by Agar Plates. CANSOP008, Aspergillus by qPCR, CANSOP020

Pass

Analyte	Limit	Mass	Status
	CFU/g	CFU/g	
Aerobic Bacteria	100000	NR	NT
Aspergillus flavus	1	ND	Pass
Aspergillus fumigatus	1	ND	Pass
Aspergillus niger	1	ND	Pass
Aspergillus terreus	1	ND	Pass
Coliforms	10000	NR	NT
E. Coli	1	ND	Pass
Salmonella	1	ND	Pass
Yeast & Mold	10000	ND	Pass

Test results only relate to the sample as received.

Residual Solvents

Date Tested: 11/02/2021
Residuals Solvents by Headspace GC, CANSOP006

Pass

Analyte	LOQ	Limit	Mass	Status
	PPM	PPM	PPM	
Acetone	1.000	1000.000	ND	Pass
Benzene	1.000	2.000	ND	Pass
Ethanol	1.000	5000.000	ND	Pass
Ethyl-Acetate	1.000	1000.000	ND	Pass
Heptane	1.000	1000.000	ND	Pass
Hexanes	1.000	60.000	ND	Pass
Isopropanol	1.000	1000.000	ND	Pass
Methanol	1.000	600.000	ND	Pass
n-Butane	1.000	1000.000	ND	Pass
Pentane	1.000	1000.000	ND	Pass
Propane	1.000	1000.000	ND	Pass
Toluene	1.000	180.000	ND	Pass
Xylenes	1.000	430.000	ND	Pass

Test results only relate to the sample as received.

Heavy Metals

Date Tested: 10/29/2021
Heavy Metals by ICP, CANSOP007

Pass

Analyte	LOQ	Limit	Mass	Status
	PPB	PPB	PPB	
Arsenic	10.000	200.000	ND	Pass
Cadmium	10.000	200.000	ND	Pass
Lead	10.000	500.000	ND	Pass
Mercury	10.000	100.000	ND	Pass

Test results only relate to the sample as received.

Mycotoxins

Date Tested: 10/30/2021
Mycotoxins by HPLC, CANSOP003

Pass

Analyte	LOQ	Limit	Mass	Status
	PPB	PPB	PPB	
Ochratoxin A	1.00	20.00	ND	Pass
Total Aflatoxins	1.00	20.00	ND	Pass

Test results only relate to the sample as received.

Havard Industries
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Lic# LAAA-8SPC-5FH4

Jeffery Havard
Lab Manager, Havard Industries

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And lastly and most importantly you will see that we take an extra step beyond the MMCC in contracting a food grade toxicology lab to do additional reagent and toxicity testing. MMCC labs cannot and do not take this necessary step. This is part of the model that we are advocating for and will help to create if our amendment is accepted to allow us to be a coequal member of this study.

THE CARLSON COMPANY INC

Call: 1-866-889-3410 or email: carlsonco@comcast.net

Client: Carlson Company LLC Addr: 10343 Federal Blvd Ste J-401 Westminster, CO 80260 Phone: (719) 531-6666 Fax: Kaily Bizsani	First Name: MC Last Name: Nutraceuticals ID: N/A Test Name: Unknown Chemicals and Toxins Profile: OCC9998 Media: Other Reason: STAT	Specid: MC Acc #: 210850064 Collected: 3/23/2021 Received: 3/29/2021 2:30 PM Released: 3/30/2021 4:31 PM Status: Complete

Drug/Test	Lab Result	Confirm Value	Screen Cutoff	Confirm Cutoff	Confirm Type
UNKNOWN CHEMICALS AND TOXINS	See Test Comment Below				

Test Comment:

Description:
Amber Waxy Substance

Findings:

No Chemicals or Toxins Detected

Screen Analysis by EIA
Analysis by LC/MS/MS
Analysis by GCMS, mass spectral data compared with American Academy of Forensic Sciences (AAFS) and Wiley/ National Institute of Science and Technology (NIST) mass spectrometry libraries.

This test is developed and validated by Expertox Laboratory. This is not a FDA approved test.

The preceding result has been reviewed and is certified to be as reported. Jasmine Cox (Certifying Scientist)

It is important to note that there are many products being sold in places like C-stores and gas stations that are marketed towards children as well as products that are overstating the psychoactivity of Delta 8, however responsible sellers like the ones represented by our association do not participate in selling products like these. Below you will see an example of some of these products and then some of the products sold by responsible retailers.


MEDIC-8-ED
NeRdy
Bears
CA
420
MG
Net Weight 20g.
Tangy & Crunchy outside


BEARLY LEGAL
DELTA 8 GUMMIES
100% Hemp Derived


NET WT
0.92 OZ (26g)
FOR MEDICAL USE ONLY
WARNING:
KEEP OUT OF REACH OF CHILDREN AND ANIMALS
MEDICATED
NERDS
SUPER SOUR
ROPE
BITES
SUPER POTENT FORMULA
DELTA 8
250 MG
60 MINUTE
ACTIVATION TIME

Now here are some products produced by companies representative of our association.


TH
FARMS
DELTA 8 THC
GUMMIES
MIXED FRUIT
500MG 25MG EACH 20 COUNT
NET WT. = 3.24 OZ. (92G)
Nutrition Facts
Servings per container 20
Serving size 1 piece (4.6g)
Amount per Serving
Calories 15
% Daily Value
Total Fat 0g 0%
Saturated Fat 0g 0%
Trans Fat 0g
Cholesterol 0mg 0%
Sodium 10mg 0%
Total Carbohydrate 3g 1%
Dietary Fiber 0g 0%
Total Sugars 2g
Protein 0g 0%
Hemp Extract (Aerial Plant Parts) 25mg †
FOLLOW & VISIT US ONLINE
@GEORGETOWNHEMP
GEORGETOWNHEMP.COM
DISTRIBUTED BY
GEORGETOWN HEMP
11607 NEBEL ST.
ROCKVILLE, MD 20852
INGREDIENTS:
SUGGESTED USE:
Take 1 gummy every 6 hours as desired.
WARNING:
Keep out of reach of children.
7 18910 35632


Δ8THC
NANO EMULSIFIED
GTH
FARMS
1500MG
Δ9 THC-Free
1 fl oz | 30ml
BD

It is important to draw these distinctions as we totally believe in regulation not just of the product itself, but also its packaging and presentation. We would like to be an ally and a resource to the legislature, the MMCC and the Dept. of Agriculture as we believe wholeheartedly that responsible hemp businesses and the medical cannabis industry can, and should, coexist.

Unlike the Maryland Medical Cannabis Industry the Maryland Hemp industry is not confined to the state of Maryland and this legislation could upend our industry in ways that can have a negative effect on the national economy. There are hundreds of manufacturers both in and out of our state who have a stake in Maryland and would be negatively affected by the passage of this type of legislation. The reality is that Delta 8 THC is currently propping up much of the hemp industry as a whole and the fallout from bills like these would be felt across the country. There is a better way forward, one that we hope could set the standard for many other states to follow. We have already drafted a comprehensive regulatory framework that we believe could serve as the model that would allow Maryland to lead the way in ensuring the continued growth of the hemp industry while simultaneously protecting the consumer. This framework includes everything from establishing an oversight commission, to setting the testing standards, licensing, penalties, age-gating, and packaging requirements. If allowed to participate in this study we can offer invaluable insight to help this working group achieve its goal.

The Maryland marijuana dispensary owners have been lobbying against the hemp industry's ability to participate in the free market since the passage of the 2018 agriculture improvement act. No hemp industry professionals were consulted in this matter. Passing the type of legislation that was originally introduced would put responsible companies like ours out of business and cost the jobs of thousands of people. The hemp industry is a large industry. The Maryland tax contribution by hemp businesses dwarfs that of the medical marijuana dispensaries and even that loss of revenue pales in comparison to the pain and suffering that this would cause to those of us who have been doing the right things in compliance with all state and federal laws. Make no mistake, this type of bill would end the Maryland Hemp Industry as we know it.

We were graciously invited by Delegate Pena-Melnyk and Senator Feldman to participate in this study and we are excited for that opportunity and we ask for an amendment to the language of this study to include our association as an equal contributor to the working group. We truly believe that our input in all matters relating to this topic would help this study achieve its stated purpose.

Thank you for your consideration.

Maryland Healthy Alternatives Association

Nicholas Patrick

Daniel Simmonds

Eric Fritschler