



***Mission:** To improve public health in Maryland through education and advocacy **Vision:** Healthy Marylanders living in Healthy Communities*

SB 788 Cannabis – Regulations – Revisions

Hearing Date: 3/29/22

Committee: HGO

Position: Favorable with amendments

The Maryland Public Health Association (MdPHA) would like to offer testimony regarding SB 788, a bill to define medical cannabis and to require a study on certain other tetrahydrocannabinols (THC), other than delta-9 THC, that are artificially, naturally, or synthetically derived, such as delta-8 and delta-10 THC.

We refer you to testimony submitted by the Maryland Medical Cannabis Commission for a review of some of the history of delta-8 THC and chemical and regulatory issues.

While MdPHA is supportive of the amendment requiring a study by the MMCC, we also continue to urge AT LEAST age gating of these products in the meantime and making them only available to those over 21. We would also like to see these products only sold in licensed cannabis dispensaries for the time being.

Unregulated products

MdPHA is concerned with the circulation of unregulated products with known and unknown psychedelic properties. While delta-8 has been the target, there are many other isomers derived from hemp with mostly unknown properties and/or side effects. They may be purchased at numerous locations, such as gas stations, convenience stores, or vape shops, or online.

Easy access for youth

There are essentially no age restrictions. Self-imposed age-gating on some websites asks the consumer to merely click “Yes” that they are 21+, if there is age-gating at all. Some companies are deriving delta-9 THC from hemp legally, thus circumventing any prohibitions or regulations on delta-9 THC. Products also often mimic candy or use candy-type flavors that are also appealing to youth and children.

Spurious claims, sexualized content in advertising

There is little research on the short and long-term effects of delta-8 THC, let alone the other numerous isomers. Advertising content is largely unregulated, with content that is currently prohibited for tobacco, alcohol, and even medical cannabis.

Toxic chemical byproducts, unregulated active ingredients

MdPHA is also concerned with the presence of harmful chemicals and/or additives in many of these products due to the lack of regulatory standards. Independent laboratory testing of these products has found not only adulterants, including heavy metals, but inaccurate labeling of the actual amount of or even presence of delta-8 contained within. Products are also often found to have higher concentrations of delta-9 THC than legally permitted.

Loss of tax revenue

Online sales of these products are often not taxed, in addition to being able to be shipped over state lines to states without regulations regarding products made from these hemp-derived isomers.

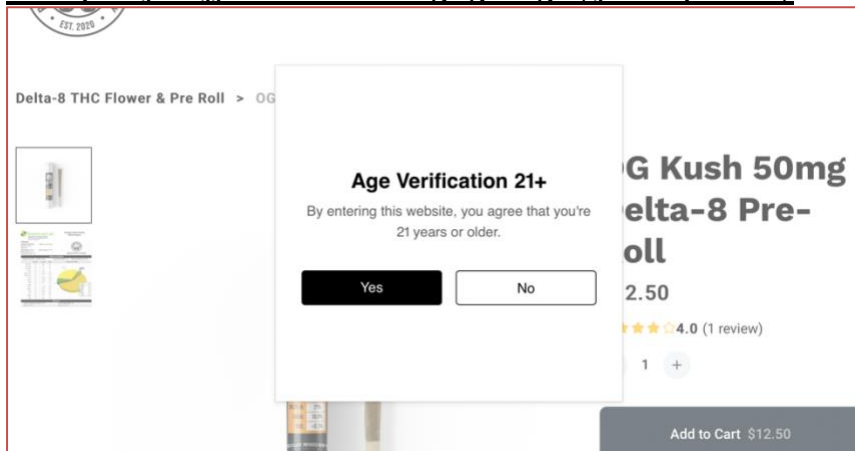
Several states have already banned these products, while others are at a minimum placing age restrictions on them. A bill currently under consideration in Virginia would require proper testing and labeling of products for potency and purity and would only allow licensed retailers to sell products to those age 21 and over.

MdPHA urges support of SB788 and the accompanying amendments, with the following considerations:

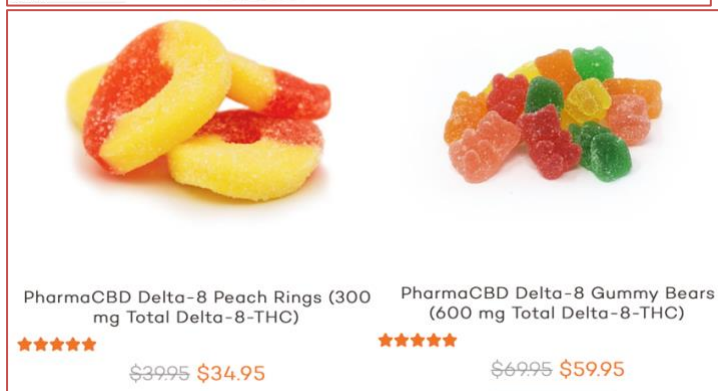
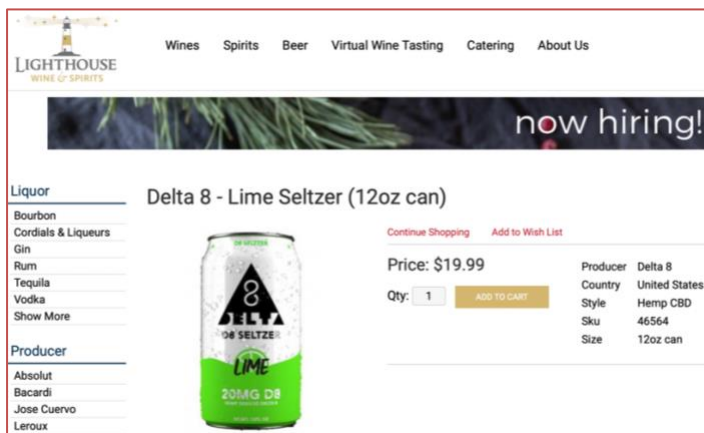
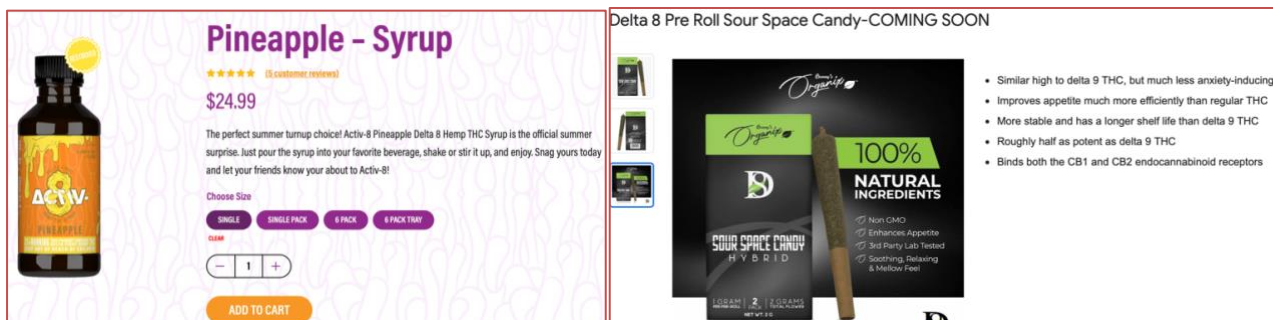
- Consider an immediate injunction of these products until the recommended study can be completed
- At a minimum, increase the legal age to access these products to 21 years or older
- Require producers and retailers in the state to register products produced and sold

We have also included a number of online product examples that illustrate some of the concerns we have expressed.

Example of ineffective online “age gating” (if even present)



Examples of flavors and multiple means of ingestion



Companies selling legal delta-9 THC products online

Premium Hemp, Delta 9, and Cannabinoid-infused Products

LIFTED! SHOP BY CATEGORY ▾ Δ9 THC LAWS LAB RESULTS BLOG BECOME A WHOLESALE CONTACT PRESS INVESTORS

Delta 9 THC

home / hemp-derived / delta 9 thc

Popularity Showing all 7 results

See 2 3 4 5 Filters ▾

Average rating

Newness

Price: low to high

Price: high to low

Accessibility

Urb Gourmet Live Resin D9+HHC Jasmine Coconut Gummies

Urb Gourmet Live Resin D9+HHC Watermelon Hibiscus Gummies

Urb Gourmet Live Resin D9+HHC Chili Mango Gummies

Urb Gourmet Live Resin D9+HHC Lavender Lemonade Gummies

Urb Delta 9 THC 250MG Gummies - \$28

\$35.00

\$35.00

\$35.00

\$35.00

\$28.00

Message us

DELTA 9 GUMMIES

\$69.95 – OR SUBSCRIBE AND SAVE 25%

Details

- Lab Tested Delta 9 THC
- 75mg Delta 9 THC Per Gummy
- 225mg Delta 9 THC Per Jar
- Drop-Shaped Gummies
- Passionfruit, Berry, & Green Apple Flavors
- 100% Natural Ingredients
- Organic, Non-GMO
- No Artificial Coloring or Flavors
- Contain less than 0.3% THC

Size: 225mg

\$69.95

Choose One-time or Subscribe and Save

☒ One-time purchase

No taxes applied at checkout

LIFTED! SHOP BY CATEGORY ▾ Δ9 THC LAWS LAB RESULTS BLOG BECOME A WHOLESALE CONTACT PRESS INVESTORS

FIRST NAME * LAST NAME *

Raimae Eck

COMPANY NAME (OPTIONAL)

COUNTRY / REGION *
United States (US)

STREET ADDRESS *
[Redacted]

Apartment, suite, unit, etc. (optional)

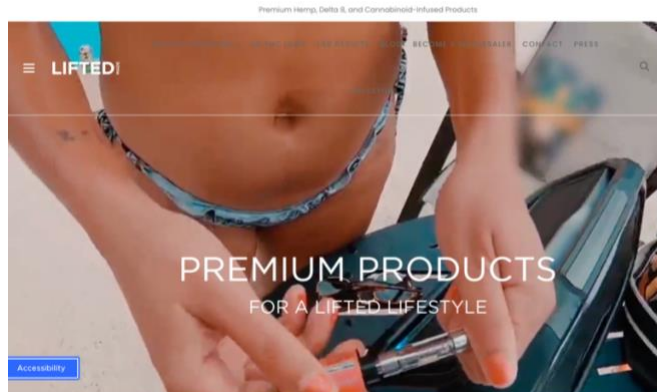
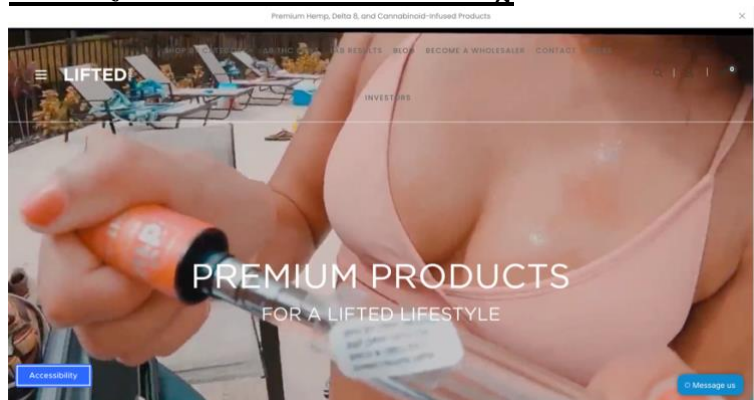
TOWN / CITY *
Gaithersburg

Your order

Product	Total
Urb Delta 9 THC 250MG Gummies : \$28 - Dragonfruit Paradise x 1 Flavor : Dragonfruit Paradise	\$28.00
Subtotal	\$28.00
Shipping	Enter your address to view shipping options.
Tax	\$0.00
Total	\$28.00

Credit Card

Sexualized content used in advertising



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The Maryland Public Health Association (MdPHA) is a nonprofit, statewide organization of public health professionals dedicated to improving the lives of all Marylanders through education, advocacy, and collaboration. We support public policies consistent with our vision of healthy Marylanders living in healthy, equitable, communities. MdPHA is the state affiliate of the American Public Health Association, a nearly 145-year-old professional organization dedicated to improving population health and reducing the health disparities that plague our state and our nation.