



Chair Melony Griffith

Vice Chair Katherine Klausmeier

Senate Finance

Miller Senate Office Building

Annapolis, MD 21401

Position: Favorable with Amendments

Dear Chair Griffith, Vice Chair Klausmeier and Committee Members:

My name is Anna Chaney. I am the founder, owner, and operator of Honey's Harvest Farm, a woman-owned and family run, regenerative agriculture farm where we cultivate hemp and a variety of herbs, vegetables, nuts, and berries. We are in Southern Anne Arundel County and offer a variety of artisanal full-spectrum CBD tinctures, bath salts, and salves designed to provide our customers a natural, plant-based solution to support their health and wellness.

In launching this business, I was fully cognizant of the differences between hemp and marijuana, and I specifically set out to create a business that could succeed within both the letter and intent of the law: healthy, natural, plant-based, *non-intoxicating* products that are as close to the natural plant as possible. This year, we will be growing hemp again as field hemp only to remediate our previously conventionally cultivated fields for aeration by the hemp roots and a very small boutique crop of compliant hemp plants as well.

As written, SB 516 - Cannabis Reform would effectively kill my business in the state of Maryland. The provisions introducing a limit on the sale of any consumable product with more than .5mg of delta-9 THC per serving and 2.5 delta-9 THC per package without an adult-use cannabis license are an arbitrary designation that would eliminate the non-intoxicating full and broad-spectrum hemp product industry, like my products. If these provisions stand, my non-intoxicating products would be illegal in the State of Maryland, and I would immediately pivot my business to take all extraction, product development, formulation, manufacture, and sale out of the state.

Honey's Harvest Farm does not, has not, and will not participate in the Delta-8 and other loophole intoxicant market. My kids and I knew this was an evolving industry when we launched, and I developed my business plan to be able to weather the market, and not have to rely on loopholes in order to survive. I strongly believe that all intoxicating products should be regulated under the jurisdiction of the MMCC (now ATCC). What constitutes an intoxicating product is the distinction that requires clarity for efficient and effective regulation.

When the 2018 Farm bill was passed paving the way for a federally defined and legal hemp market, it contemplated a market that includes full spectrum cannabinoid products. I respectfully urge this committee not to take action that kills the legal hemp industry in Maryland before it has the chance to develop as it has in other states. There is room for both the marijuana and hemp industries to coexist and thrive. Other states are leading the way and can provide examples of how to achieve this.

Specifically, Colorado is at the forefront of states where both the medical and adult-use marijuana industries and the hemp industries coexist and thrive. As a result, they are also at the forefront of policy initiatives to address the question of how and where to regulate intoxicating components of marijuana vs. hemp. I would urge the legislators to look to Colorado's leadership as the gold standard for producing a legal and regulatory framework to accommodate both a healthy and thriving marijuana industry and hemp industry in Maryland. Specifically, I would support a standard that utilizes a CBD to THC ratio as an indicator on whether or not the product is intoxicating, as Colorado has proposed.

Similarly, Vermont has adopted this approach. In tackling developing their regulatory framework, Colorado set up a Task Force that included all stakeholders to determine an appropriate standard between intoxicating and non-intoxicating hemp products. Based on their findings, they established a 15:1 CBD to THC ratio or higher. Vermont chose a 20:1 CBD to THC ratio as their standard, which was adopted by their legislature. Hemp products complying with the aforementioned ratios are registered as "hemp manufactured products" and products that do NOT comply are registered as adult-use products.

Colorado and Vermont have created clear, streamlined, effective testing requirements and processes to regulate hemp and adult use products in alignment with the federal law, from plant to product.

Therefore, it is my recommendation that this committee amend the bill before it today to adopt a similar regime for determining whether a hemp-derived product should be regulated as a hemp manufactured product or as an adult use product. By following the guidelines set in Colorado, Maryland will be able to ensure that non-intoxicating hemp products will still be available to licensed hemp farmers and producers.

I look forward to working with the committee and the bill sponsors to craft language that would allow Maryland hemp farmers to continue to keep their farms, grow hemp and sell hemp as a non-intoxicating therapeutic, and continue to benefit the Maryland economy.

Respectfully,
Anna Chaney
Certified Functional Nutrition Counselor
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LINKS: Colorado Legislation: https://leg.colorado.gov/sites/default/files/2022a_205_signed.pdf
Vermont Regulations: <https://ccb.vermont.gov/hemp>