From: Steven Brown
To: Patrick McQuillan
Subject: 3565 Bill - Would like to testify
Date: Thursday, March 17, 2022 10:02:11 AM

Hi Patrick,

The Minnesota Cannabis Association believes we need to develop a working group to discuss dosage, and safety regulations. It is important that we develop a working group with industry stakeholders and Minnesota hemp customers. The Minnesota Cannabis Association is willing to work alongside regulators to develop safe regulations. The Minnesota Cannabis Association Board Member Steven Brown would like to testify tomorrow at the 3565 hearing.

The Minnesota Cannabis Association (Former Minnesota Hemp Association) has over 150 members in hemp retail and manufacturing.

Here is what we drafted so far in regards to safe regulations for Delta based products.

21+ on all Delta 8/Delta10 products

1. All retailers must ID all customers once a customer enters the store.

2. All website must have 3rd party age verification tool that checks ID prior to shipping or delivery of products (Example: https://agechecker.net/ <https://agechecker.net/>)

Legal Disclaimers On Packaging or Attached To Packaging

1. 21+ shown on front and backside of packaging disclaimer
2. Maybe intoxicating disclaimer
3. Heavy machinery/driving disclaimer
4. Drug interaction disclaimer
5. Possible health consequences disclaimer
6. Keep out of reach of children disclaimer
7. Flower: Disclosure that D8/D10 is infused and not naturally recurring in the plant

Full Panel Test (See Appendix)

Regulations and standards for acceptable limits of specific compounds are currently being developed on state levels to ensure cannabis products do not compromise a person's immune system. The two major reasons cannabis products require lab testing are first to verify a product is safe to consume and second to give consumers an idea of the potency. The relationship between producers, retailers and consumers converge on testing. The lack of manufacturer specific methodologies is an industry quality risk that needs to be considered.

1. Residual Solvent
2. Heavy Metal
3. Pesticides

4. Mycotoxins
5. Pathogenic SAE (qPCR)
6. Potency
7. Listeria Monocytogenes

Full panel tests must be conducted by ISO certified laboratory and/or DEA registered laboratory.

Child Proof Packaging

1. All products must be in a Certified Child Resistant packaging
2. All packaging needs to meet Consumer Product Safety Commission's (CPSC)
3. All packaging must meet the requirements of U.S Poison Control Prevention Packaging Act (PPPA)
4. Packaging must not imitate existing food products
5. Packaging cannot be aimed at children

Supplier/Manufacturer Responsibility (Quality Control)

1. Extractor must full panel test D8/D10 and provide testing to formulator/supplier
2. Formulator/Supplier must provide SOP/ type of solvents used in the conversion of Delta 8 / Delta 10
3. Formulator/Supplier must provide full panel test on the final product
4. Formulator/Supplier must batch test all products and provide batch number to retailer/distributor
5. Formulator/Supplier is responsible of sharing chain of custody/full panel lab test to retailer

Retailer Quality Control Responsibility

1. Retailer must full panel test each new batch for quality control
2. Retailers must keep chain of custody up to 3 years.
3. Retailers must report any unsafe products/hot products to the MDA/ Safety DSI and/or Board of Pharmacy

Hemp License/Tobacco License

1. Retailers that sell CBD/Delta must be a licensed hemp shop or licensed tobacco shop. Proposed license fee $650-$1500 per location to sell CBD/D8. The licensed locations are regulated by either MDA/Safety Inspections DSI.Appendix

Below is a list of tests which would constitute a full panel test. This list is evolving as new methods of growing, extracting, and producing cannabis products evolve

Residual Solvent Test:

Organic volatile chemicals that are used or produced in the manufacture or refinement process of hemp. If excess amounts remain in the final product, it can be harmful to the end user. Remediation must be used and the remaining levels must be tested to ensure a safe product.

* 1,2-dichloroethane
* 1,1-dichloroethene

* Acetone
* Acetonitrile
* Allumina
* Benzene
* Chloroform
* Citric Acid
* Ethanol
* Ethyl Acetate
* Ethyl Ether
* Ether
* Ethylene Oxide
* Heptane
* Hexane
* Isopropyl Alcohol*
* Methylene Chloride
* Methanol
* Butane
* Pentane
* Phosphoric acid
* Propane
* Trichloroethylene
* Toluene
* Total Xylenes
* Toluene
* Tribunal Alluminum
* P- Toluenesolfonic Acid
* Sulphuric Acid

Heavy Metal

Heavy metals exit cannabis plants through trichomes, which are hairlike structures located on the flowers. Trichomes are important because they store the CBD oil and the tetrahydrocannabinol (THC) that are desired by consumers.

* Arsenic

* Cadmium (Cd)
* Lead
* Mercury

Pathogenic (qPCR)

Viruses can interact with other fungal pathogens to produce disease symptoms in cannabis and hemp plants, which is why monitoring the presence is critical for consumer safety. Virusescan be vertically transmitted through seeds, where breeders should screen plants before crossing.

* Shiga Toxin Prod. E. Coli (STEC)
* Salmonella Species
* Listeria Monocytogenes
* Aspergillus

Mycotoxins

Two classes of mycotoxins, Aflatoxins and Ochratoxins, are produced by molds like Aspergillus. Both classes have carcinogenic and mutagenic properties that can alter our DNA and cause the formation of cancer. Mycotoxin testing will ensure that your products are safe for inhalation and consumption.

* Alfatoxins B1
* Aflatoxins B2
* Aflatoxins G1
* Aflatoxins G2
* Ochratoxin A

Pesticides

Far too many pesticide-laced cannabis products are reaching consumers in states where recreational or medicinal marijuana has been legalized. Accurate pesticide testing is necessary to ensure medical cannabis products are contaminant free and safe for human consumption.

* Abamectin_A
* Acephate
* Acequinocyl
* Acetamiprid

* Aldicarb
* Azoxystrobin
* Bifenazate
* Bifenthrin
* Boscalid
* Carbaryl
* Carbofuran
* Chlorantraniliprole
* Chlorfenapyr
* Chlorpyrifos
* Clofentezine
* Cyfluthrin
* Cypermethrin
* DDVP(Dichlorvos)
* Daminozide
* Diazinon
* Dimethoate
* Ethoprop(hos)
* Etofenprox
* Etoxazole
* Fenoxycarb
* Fenpyroximate
* Fipronil
* Flonicamid
* Fludioxonil
* Hexythiazox
* Imazalil
* Imidacloprid
* Kresoxim-methyl
* MGK-264
* Malathion
* Metalaxyl
* Methiocarb
* Methomyl
* Methyl-parathion
* Myclobutanil

* Naled
* Oxamyl
* Paclobutrazol
* Permethrin
* Phosmet
* Piperonyl_butoxide
* Prallethrin
* Propiconazole
* Propoxur
* Pyrethrins
* Pyridaben
* Spinosad
* Spiromesifen
* Spirotetramat
* Spiroxamine
* Tebuconazole
* Thiacloprid
* Thiamethoxam
* Trifloxystrobin

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<https://docs.google.com/uc?export=download&id=1gT7mpaQkd7k32kgjoJGTkAUsJm7iRd4D&revid=0B_nz4LIQsnesRFY3ZEFVYUVnMDVHekNwOWlEc1loek9YU21ZPQ>