

ATTN: House Committee Members

Re: HF 3595

My name is Josh Hassing, and I am the Director of Regulatory Compliance for Twin Cities Cannabis, a CBD company located and operating here in Minnesota. I am submitting written testimony regarding HF 3595, as there are aspects of this bill I agree with, but also some that I disagree with. This being said, I would like to offer the opinion and insight of someone who works in the industry, and who has implemented policies within my company that supersede current regulatory requirements from state and federal jurisdictions.

To begin, I would like to address the amendment that states a person must be 21 years of age or older to purchase products derived from hemp. My company adopted this policy of our own accord when we first launched our product line two years ago. While we believe CBD (and other non-psychoactive cannabinoids) can be beneficial for people of all ages, we understand and embrace the fact that it is highly inappropriate for underaged individuals to enter these shops to independently purchase these items. This being said, however, I would strongly urge you to include an amendment that would allow a legal way for parents to administer CBD to their underaged children for therapeutic purposes if conversations between them and their doctors lead to this outcome.

As I'm sure you're all aware by now, Delta-8, Delta-10 and other cannabinoids have been finding their way into the market over the past year or so. There have been a number of concerned voices calling this out, and there's been a few conversations regarding the legality of these products both now and in the future. In response to that, I would just like to point out and clarify that Delta-8 and Delta-10 are actually weaker forms of THC when compared to their sister, Delta-9 (the one we all know about). To be clear, the popularity of these products in recent times is in no way an indication of their potency, and when coming from reputable companies, these products are not dangerous, either.

This being said, limiting products to a total THC content of 0.3%, or gummies to 2.5mg with a maximum container dose of 25mg is overzealous and unnecessary. When looking at your average container of gummies, the most common dosage levels are in the range of 5mg-25mg per gummy, with container counts ranging mostly from 10 pieces to 20 pieces. Gummies or other edibles containing these dosages allow for easy use of the product, as well as a more economical approach. Gummies in this strength allow users to only take as little as one gummy to feel the desired effects, allowing them to ultimately spend less money on products that are often taken for medicinal purposes. And before you ask, yes – gummies can be taken for medicinal purposes. When working with cannabinoids, some delivery methods work better than others on individual bases. Some people have better results using edibles, while others may benefit more from topical application or actually smoking the plant. Singling out one method of delivery is extremely short sighted, as there's a reason that more than one delivery method exists, and it's not financial.

Due to my constant exposure to the retail world, I am able to talk with vendors, distributors, retailers and customers on a daily basis. In these conversations, I'm not only able to find out what products are popular, but also why they're popular. The reasons why do vary, but not as much as you'd think. Yes, there are customers who purchase these products to "have a good time" or "wind down after a long day/week", but I was genuinely surprised to find out they weren't the majority of people that I talked with. Most of the people that I talked with use these products to deal with pain, insomnia, anxiety or

other ailments. Some people don't qualify for Minnesota's medical program, so they use over-the-counter retail products from companies they trust. They do this because they don't want to fill their bodies with artificial chemicals and compounds that traditional medication contains, but they want relief from whatever they're struggling with. Another large portion of the customer base for these products are people who are actually on the Minnesota medical program. They state the reason they purchase retail products is the prices for the dispensaries in the medical program. I hear almost daily how expensive the program is just to sign up for it, and then how expensive the products are. Customers are swarming to the free market because the government has failed them and passing this bill into law in its current form will fail them yet again.

To be honest, I'm really not sure why so many people continue to fear and vilify cannabis. Does it have potential psychoactive properties? Yes, depending on several factors. Does it have medical benefits? Absolutely, that's been proven time and again. This being said, I fail to see why it's so important that the only way people can medicinally benefit from cannabis is by going through the state. We shouldn't be nannying adults.

In conclusion, I propose (and urge) the following amendments:

- Minimum age of purchase for products containing cannabinoids: 21
- Language that protects parents who use non-psychoactive cannabinoids for therapeutic or medicinal purposes for underage children in their custody
- Cannabinoids with psychoactive properties (Delta-8, Delta-10, THCP, THC-O, etc) must be derived from hemp, and finished products containing these cannabinoids must not contain more than 0.3% THC-D9.
- Products containing cannabinoids with psychoactive effects must be sold in child-resistant packaging (my company already adopts this policy.... It's just a really good idea)
- Products containing any cannabinoid must be clearly labeled with dosing and usage information, a list of contents or ingredients, and a QR code that links to the test results for that product (you already have this in your bill, but it's already federally required... plus it's just a really good idea)

Thank you for your time. As always, I encourage any and all of you to reach out to me with any questions or comments. I'm always more than willing to work with legislators on drafting common-sense legislation.

Josh Hassing

Director of Regulatory Compliance – Twin Cities Cannabis

josh@twincities-cannabis.com

Cell: 612-803-2556

Office: 952-513-7805