

Significant Negative Impacts of SB591S3

Prepared by Blake Bilger, owner Cypress Hemp, one of the largest hemp companies in Virginia.

DIRE CONCERNS RE: SB591S3 (alternative language for 591 on Page 2)

- 1) **SB591S3** re-defines all hemp products that contain more than 0.25mg of THC per serving and 1mg of THC per finished product, as marijuana.
- 2) This redefines 90% of all hemp products in the nation as marijuana, even some of the lowest strength CBD oils and topicals, and gives control of 90% of all hemp products to the Virginia Cannabis Control Authority (Virginia's marijuana regulatory agency)
- 3) The 2014 and 2018 Federal Farm Bills' (as it relates to hemp) intent was to clearly and definitively separate non-intoxicating cannabis (hemp) and intoxicating cannabis (marijuana).
- 4) **SB591S3** is a complete reversal of the historical 2014 and 2018 Federal Farm Bill and their intent, and would make Virginia, by far, the worst state in the nation to have a hemp company, making it essentially impossible to operate a sustainable hemp business in Virginia.
- 5) This would cause the immediate closure and/or migration out of state of 1000+ of hemp businesses, including my \$50,000,000 business. The Virginia hemp industry employs thousands of Virginians and provides millions of dollars in tax revenue.
- 6) This bill effectively exterminates a newly created burgeoning hemp industry... completely reverses the intent of two historical farm bills... and goes 100% against what 49 other states, the US federal government, and dozens of nations around the world are doing as it relates to hemp regulations and the definition of hemp products.

2/23/2022 Statement from the US Hemp Roundtable, the most respected legal authority on hemp in the United States:

“It is the opinion of our scientific experts that hemp products that contain more than 3 mg of THC per serving exceed the 2018 Farm Bill threshold of 0.3% delta-9 THC on a dry weight basis.”

Current 591 Language:

Marijuana" means.... any substance containing

(a) a total tetrahydrocannabinol concentration that exceeds 0.3 percent or

(b) more than 0.25 milligram of tetrahydrocannabinol per serving or more than one milligram per package.

Commentary on reasoning for Alternative Language:

The 0.25mg per serving limit will ban 95% of non-intoxicating hemp products. The US Hemp Roundtable’s scientists have stated that 3mg/serving and less is in line with the intent of Congress with the 2014 and 2018 Federal Farm Bills.

The 1mg/package limit is arbitrary and discounts the fact that a large bottle of lotion or a large bag of CBD Dog Treats will clearly have more than 1mg/package, because it’s a larger product. This is arbitrarily requiring all products to be in tiny packaging.

Suggested Alternative Language for 591:

Marijuana" means.... any substance containing

(a) a total tetrahydrocannabinol concentration that exceeds 0.3 percent or

(b) more than 3 milligram of tetrahydrocannabinol per serving

To Virginia legislators and whom it may concern,

Please do not support *SB591S3* as you'd be supporting the destruction of a strong agriculture based industry that was just created, and make Virginia the worst state in the nation and one of the worst places in the world to own a hemp business.

If this bill is passed, I will be forced to relocate my company Cypress Hemp II LLC, which is on track for a \$50,000,000+ valuation and employing 100 people by the end of this year, to any other state, because no other state in the US would have a more restrictive hemp law than Virginia, should this pass.

Respectfully, and with dire concern for my home state of Virginia,

Blake Bilger

Co-owner Cypress Hemp

blakebilger@cypresshemp.com

804-822-5431