



July 25, 2022

Submitted electronically via online portal and via electronic mail

Parker Slaybaugh  
Deputy Secretary of Agriculture & Forestry for Governor Glenn Youngkin  
Chair of Virginia Hemp Task Force  
Patrick Henry Building  
1111 East Broad Street, 4th Floor  
Richmond, VA 23219

Dear Deputy Secretary Slaybaugh,

**About Consumer Brands and Our Interest in the Hemp Task Force**

The Consumer Brands Association champions the industry whose products Americans depend on every day, representing more than 1,700 iconic brands. From household and personal care to food and beverage products, the consumer packaged goods industry plays a vital role in powering the U.S. economy, contributing \$2 trillion to U.S. GDP and supporting more than 20 million American jobs. Our agenda is focused on smart regulation that prioritizes consumer health and safety above all, promotes product transparency, avoids consumer confusion, and fosters innovation and growth for industry.

Consumer Brands appreciates the opportunity to provide comments to the Virginia Hemp Task Force. We recognize that cannabis legislation is a loaded issue with strong opinions on both sides. While we are agnostic on the overarching issue of cannabis legalization, we are concerned with the risks posed by food products adulterated with THC, especially when such products are sold in deceptive, copycat packaging.

**Consumer Brands' Engagement**

With the health and safety of consumers in mind, we have in-house regulatory and legal resources focused on issues related to cannabis and THC, and are engaging with U.S. Food and Drug Administration, national law enforcement, and groups focused on the regulatory and policy challenges related to THC laced edibles.

In the Commonwealth, we partnered with [Attorney General Jason Miyares' on a briefing](#) in June on the dangers to children of copycat THC edibles, and participated in the July 7 Hemp Task Force meeting. We were encouraged to hear VDACS' comments underscoring the harm of adulterated foods and commend the Hemp Task Force for raising awareness on this issue. We ask that you continue to engage with us and use us as a resource as the task force completes its report and recommendations on delta-8/hemp extracts.

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**day**

**Powering every**



## **Research Confirms Consumer Confusion & FDA Confirms Growing Risk of THC Adulterated Products**

As more states legalize marijuana and the market grows for industrial hemp extracts, the potential for confusion and accidental ingestion is amplified. In addition to confusing packaging, a [recent NYU School of Global Public Health study](#) highlighted concerns over mislabeling; for example, the extremely high THC content of copycat products, which greatly exceeded the maximum content stipulated by cannabis regulations in most states where marijuana is legal.

Just last month, the United States Food and Drug Administration has also noted that national poison control centers [received nearly 10,500 single substance exposure cases](#) involving edible products containing THC in the first five months of 2022. Of the total cases, 65% involved unintentional exposure to edible products containing THC and nearly all (91%) of these unintentional exposures affected pediatric patients. This underscores the ongoing nature of this problem and the helpful role the Task Force can play.

### **Looking Ahead**

Consumer brands stands as a ready partner to support the Hemp Task Force and provide additional information and consultation as needed. Thank you for your continued attention to this important issue.

*Joseph T. Aquilina*

Joseph Aquilina  
Senior Director & Associate General Counsel  
Consumer Brands Association