



November 14<sup>th</sup>, 2022

Chairman Matthew J Lohr  
Secretary of Agriculture and Forestry  
P.O. Box 1475  
Richmond, Virginia 23218

**Re: Public Comments on the Draft Report for the Task Force to Analyze Industrial Hemp Extracts and Other Substances Containing Tetrahydrocannabinol Intended for Human Consumption**

Dear Secretary Lohr, Deputy Secretary Slaybaugh, and Members of the Task Force:

Thank you for the opportunity to provide feedback on the recently released draft report from the hemp task force. The Virginia Hemp Coalition was founded in 2012 and is the leading hemp advocacy organization in the Commonwealth of Virginia. We pride ourselves on representing the entire industry, from farmers and businesses to consumers, and having a big picture / long-term approach to policy recommendations. While many agencies and groups in our industry focus on the short term, or only represent a certain section of the industry, we at the VHC believe that the benefits that cannabis / hemp products can provide, and the future of the cannabis / hemp industry, is so much larger than those limitations. This beneficial plant has many gifts to offer our communities including basics such as food, fuel, fiber, textiles, building materials, and important medicine / wellness products.

One powerful entity has stood between the benefits of cannabis and the public at large over the last 85 years, and that has been the United States Government. Imagine the multitude of various beneficial products we would have if we had just regulated this plant and its various compounds instead of prohibiting and pushing it underground into the black market. Virginia presently could be a leader in the Nation and the World as cannabis research began here in 1970's at Virginia Commonwealth University. In 1974 VCU released a study on the antineoplastic activity of cannabinoids. This groundbreaking medical research showed the promise of cannabinoids for inhibiting lung tumor growth. Moreover, the continual cannabis research at VCU led to Virginia having one of the first laws to legalize medical cannabis for glaucoma and cancer treatment in 1979. Over the years, VCU has continued to study cannabinoids and still have cannabis experts in their medical program. The Federal Governments restrictions have hindered the real-world applications unfortunately, but times are changing and Virginia can be a national leader in the emerging field of cannabinoid science once again.

Under the leadership and research of Dr. Raphael Mechoulam, a professor of medical chemistry at the Hebrew University of Jerusalem, Israel has become the world leader in Cannabis research. Virginia should be working just as hard as Israel is to help continue to uncover the benefits of the various 120 plus cannabinoids. To do so we need the freedom to innovate and build upon the foundation we already have in the Commonwealth. We urge all members of the task force to continue to educate themselves on the endocannabinoid system in the human body and why cannabinoids are such a valuable tool for health and wellness.

The erroneous vilification of cannabis by the Nixon administration and the biased /double standard prohibitions that have followed created quite a present problem in this country with the proliferation of

cannabis products and their regulations (or lack thereof). Now, most Americans and Virginians are waking up to the fact that the failed policies of the past, along with the current “kicking the can down the road” for this emerging industry has been a great mistake and has caused many of the issues we are now facing. What we are experiencing presently is the culmination of the failure of politicians and bureaucrats to legitimize and properly regulate this plant and its various compounds and products. The best way to move forward is to acknowledge the wrongs of the past and immediately correct them. We need simple regulations like all other legal products on the store shelves. Some may think this process should be complicated but we are not reinventing the wheel. There are other similar types of products in the market that show us how this can be done. Legalizing, decriminalizing, legitimizing, and fairly regulating the entire cannabis industry is the only solution. We cannot afford any more bias, ignorance, or discrimination of our emerging industry and market. This market, and all the people willing to serve it and support it, are here to stay.

Regulations should be simple and straightforward. Intoxicating cannabinoid products should be sold only to adults 21 and over, in stores that carry a license (much like tobacco and alcohol is sold by licensing in retail stores). These products should be labeled correctly, and batch tested with a QR code available to show the results on a website. These types of intoxicating cannabinoid products and brands should never infringe other companies’ trademarks and should not attempt to market to children or mimic popular candy and snack products. Non-intoxicating cannabinoid products should be sold like other over the counter dietary supplements, foods, and beverages with similar regulations. The determination of intoxicating and non-intoxicating cannabinoids should be science based. While our industry shares the goals of wanting safe and well-made hemp products in the marketplace and keeping them out of the hands of children, we need to balance that with not having extra bias, double standards, and over regulation for our entire industry under any circumstance.

When thinking about the entire cannabis industry we need to think long-term. Hemp grown for fiber and grain must be treated like other similar agriculture crops. Hemp flower may should be regulated differently, but we should be looking at regulating the end products when it comes to intoxicating products. Much like grapes, apples, corn, wheat, and potatoes make intoxicating end products we don’t put undue burdens on the farmers. Regulations for final products should focus on the manufacturers and retailers. We must look to the future, and the future is a national cannabis industry with a massive workforce opportunity for the Commonwealth. The future is taxation and regulation that is straightforward, fair, and in line with other similar industries.

We are at a crossroads in Virginia. We must decide if we are going to continue the wrongs of the past or have a clear vision for the Virginia cannabis / hemp industry with simple and static regulations that allow businesses to innovate and create better products for our society. This is the only true solution if we are to take the black / grey markets (which already exist) and move them to create thriving businesses in the free market. We appreciate you listening to our comments and concerns and we as an industry will continue to work in good faith towards our mutual goals of improving cannabis / hemp products while balancing fair economic growth and protecting children from products they should not have access to. In recommending policy, we must focus on how these future laws and regulations will affect access to the market for Virginia small businesses, farmers, and cannabis / hemp product consumers. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Amatucci". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Jason Amatucci  
President  
Virginia Hemp Coalition