



**To: Members and Staff of WSLCB**

**Subject: Response to Agency Request Legislation and Ongoing Rule Projects on Synthetic Cannabinoids**

**October 18, 2021**

The [Washington Sun and Craft Growers Association](#) (WSCA) is the only all licensee led trade organization in Washington state. We represent over 60 grower members that own over 100 licenses.

The WSCA's mission is to advance and protect the interests of sun and craft cannabis growers through the development of rule and law that supports an economically and environmentally sustainable cannabis industry.

We want to offer our feedback on the current legislative proposals and ongoing rule projects regarding additives including synthetic cannabinoids from hemp and other sources. Our membership appreciates the action taken with the April policy statement and subsequent enforcement bulletin that made it clear there is no safe harbor for licensed processors to create THC compounds from hemp. We agree with the proposed legislation's intention to expand WSLCB's authority over all psychotropic and impairing compounds of the cannabis plant. That action will protect consumers and the interests of licensed growers. Thank you from our entire board and membership for taking those steps.

However, the proposed legislation, beyond that very necessary expanded authority, is not ready to be put forward this session. Our position is that this legislation will be harmful to our existing economy and to all operating cannabis businesses in Washington State. The only beneficiaries of this approach are external actors looking to avoid regulatory burdens in the cannabis space. This is not necessary, nor innovative. It is using patented methods from the 1980s to produce synthetic THC from CBD in contradiction of existing laws in our state.

The passage of HB2334 in 2018 which is reflected in RCW 69.50.326 harmed licensed growers by replacing the demand for our regulated CBD dominant biomass with unregulated CBD sourced outside the system. We all witnessed the abuse of this privilege when synthesized THC from CBD isolate began to infiltrate the market, depress prices along with tax revenue, and destabilized a highly regulated closed market system.

Many listened to the three panels of scientific experts on the matter of chemical manipulations of cannabinoids and it was clear there is no confirmation that man-made cannabinoids are safe. Research is needed to determine the safety of these synthetically derived compounds. That research is best done in noncommercial settings, by medical minded scientists instead of by for-profit corporations experimenting on Washington cannabis consumers and making large profits while doing so. History has shown us countless examples of this approach going wrong and harming people at a very large scale.

We believe the WSLCB needs regulatory authority all forms of THC and similarly acting compounds from cannabis, if that authority is granted we are confident that existing laws and the rule process can adequately address these concerns and solve the issues caused in the last few years by the importation. We look forward to working together on strengthening safety and economic fairness in our industry.

Sincerely,

Board of Directors

Washington Sun and Craft Growers Association

Jeremy Moberg, CannaSol Farms

Jade Stefano, Puffin Farm

Jason Poll, Gorge Gold

Micah Sherman, Raven

Matthew Frigone, Lazy Bee Gardens

Ryan Sevigny, Landrace Labs

Shawn DeNae, Washington Bud Company

Tamara Weinmann, Bellevue Cannabis