THE STATE of ALASKA
GOVERNOR MICHAEL J. DUNLEAVY

Department of Health and Social Services
OFFICE OF THE COMMISSIONER

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March 3, 2021

Glen Klinkhart, Director
Alcohol and Marijuana Control Board
550 W 7th Ave, Suite 1600
Anchorage, AK 99501

Dear Mr. Klinkhart:

On behalf of the Department of Health and Social Services, Office of Substance Misuse and Addiction Prevention, we are respectfully submitting comments in opposition to the proposed regulations 3 AAC 306.560 and 3 AAC 306.645(b)(1)(C)(i) to increase the THC content in both a single serving edible from 5mg to 10mg, and multiple serving package total THC value from 60 mg to 120mg. Science to date shows a dose-response relationship between THC concentration or potency and health and safety consequences—particularly among vulnerable populations including youth and pregnant women, and individuals at risk for developing mental health disorders. For these reasons, our position is that the greater the potency of cannabis products, the greater the likelihood of adverse health effects. We urge the Marijuana Control Board to not consider regulations related to THC potency before there is adequate science and research on the health impacts of increasing THC values in regulated products

Young people are particularly vulnerable to negative effects of high potency cannabis as evidenced by poison center call data related to accidental ingestion or over intoxication. Calls to Poison Centers about manufactured cannabis products are increasing nationally, and in Alaska about half of marijuana-related poison center calls in 2017 were for Alaskans under the legal age. The majority of Alaska's calls (more than 3 out of 4) were for teens ages 13-19.[1] This proposed policy change has implications for accidental overdose due to how multiple servings of liquid edible products are currently regulated under 3 AAC 306.560. Multiple servings of liquid edibles lack intuitive dosing mechanisms, and we are concerned that if the total THC value for a liquid unit is set at 120 mg, unintentional accidental ingestion may occur. Therefore, we are also suggesting a regulatory change that all liquid marijuana products be sold in a structure that uses a single mechanism to achieve both child-resistance and accurate pouring for each liquid serving in increments consistent with the concentration limits set out in 3 AAC 306.560.

The risk of developing cannabis use disorder or addiction, particularly among adolescents, is greater with use of high potency cannabis products. Cannabis addiction, known as Cannabis Use Disorder (CUD), is a condition that impairs social functioning, memory, decision-making, and school/work performance. A growing body of research suggests that

[1] Alaska Department of Health and Social Services. Marijuana Use and Public Health in Alaska. 2020. Accessed here: http://dhss.alaska.gov/dph/Director/Documents/marijuana/MarijuanaUse_PublicHealth_Alaska_2020.pdf

frequent cannabis use and high potency cannabis increase the chances of experiencing CUD,[2,3,4] especially in young people who report more frequent experience of paranoia and memory impairment.[5]

High potency cannabis use can have lifelong mental health consequences, which often manifest in adolescence or early adulthood. Daily cannabis use, particularly of high potency products, increases the risk of developing a psychotic disorder, like schizophrenia, and is related to an earlier onset of symptoms compared to people who do not use cannabis. Among those with a psychotic disorder diagnosis, the use of high potency cannabis exacerbates these symptoms.[6]

There is a great need for additional research on THC concentration prior to advancing cannabis policy or regulations, especially as it relates to pregnant or breastfeeding women, as well as impaired driving. Cannabis use during pregnancy is associated with negative health impacts for infants (low birth weight, decreased IQ scores, attention problems)[7] and can have social and legal repercussions for the pregnant woman. It is unclear to date whether use of cannabis with high THC concentration during pregnancy poses greater risk for poor health outcomes among infants. Similarly, while research supports a link between cannabis consumption and driving impairment, no consensus exists on THC concentration levels and ensuing impairment. As such, there is a great need for additional research on THC concentration prior to pursuing regulatory changes to increase concentration or potency limits.

Based on these concerns for the health and safety of Alaskans, we recommend the Board oppose the proposed changes to regulations 3 AAC 306.560 and 3 AAC 306.645(b)(1)(C)(i) to increase the THC content in board approved edible products**.** Thank you for your time and consideration in supporting the health and safety of all Alaskans.

Sincerely,

Anne Zink, MD, FACEP

Chief Medical Officer

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[2] Bidwell LC, YorkWilliams SL, Mueller RL, Bryan AD, Hutchison KE. Exploring cannabis concentrates on the legal market: User profiles, product strength, and health-related outcomes. Addictive Behaviors Reports. 2018;8:102-106.
[3] Curran HV, Hindocha C, Morgan CJA, Shaban N, Das RK, & Freeman TP. Which biological and self-report measure of cannabis use predict cannabis dependency and acute psychotic-like effects? Psychological Medicine. 2019;49:1574-1580.
[4] Hines LA, Freeman TP, Gage SH, Zammit S, Hickman M, Cannon M, Munafo M, MacLeod J, & Heron J. Association of high-potency cannabis use with mental health and substance use in adolescence. JAMA Psychiatry. 2020;epub ahead of print E1-#8.
[5] Freeman TP, & Winstock AR. Examining the profile of high-potency cannabis and its association with severity of cannabis dependence. Psychological Medicine. 2015;45:3181-3189.
[6] Di Forti M, Quattrone D, Freeman TP, et al. The contribution of cannabis use to variation in the incidence of psychotic disorder across Europe (EU-GEI): a multicentre case-control study. Lancet Psychiatry 2019; 6: 427–36.
[7] Monitoring Health Concerns Related to Marijuana in Colorado. Colorado Department of Public Health and Environment. 2020. Accessed here: https://drive.google.com/drive/folders/1H9g7iwIIW-NMdDCgmtdgk8zvjwWcQGqd

alaska children's trust

5 March 2021

Glen Klinkhart, Director
Alcohol and Marijuana Control Board
550 W 7th Ave, Suite 1600
Anchorage, AK 99501

Dear Mr. Klinkhart,

On behalf of the Alaska Children's Trust, we are respectfully submitting comments in opposition to the proposed regulations 3 AAC 306.560 and 3 AAC 306.645(b)(1)(C)(i) to increase the THC content in both a single serving edible from 5mg to 10mg, and multiple serving package total THC value from 60 mg to 120mg. Alaska Children's Trust is the statewide lead organization focused on the prevention of child abuse and neglect.

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Marcus Wilson

Science to date shows a dose-response relationship between THC concentration or potency and health and safety consequences—particularly among vulnerable populations including youth and pregnant women, and individuals at risk for developing mental health disorders. For these reasons, our position is that the greater the potency of cannabis products, the greater the likelihood of adverse health effects. We urge the Marijuana Control Board to not consider regulations related to THC potency before there is adequate science and research on the health impacts of increasing THC values in regulated products.

There is a great need for additional research on THC concentration prior to pursuing regulatory changes to increase concentration or potency limits. To date, there are still many unknown factors in how THC concentration affects children and youth in cases of accidental dosage. We are concerned that this big of a jump in concentration could have adverse effects on youth – especially teens ages 13-19 - that somehow get ahold of edible marijuana products. Before we put such potent products out to the public, we believe more testing and research should be done not only so regular marijuana consumers are informed, but parents, children, and youth who might come across these products know the risks and potential side effects of consumption of high concentrations as proposed. We would hate to see the risk of developing Cannabis Use Disorder (CUD) increase in adolescents, which has been known to correlate with the use of high potency cannabis products.

Based on these concerns for the health and safety of children and youth, we recommend the Board oppose the proposed changes to regulations 3 AAC 306.560 and 3 AAC 306.645(b)(1)(C)(i) to increase the THC content in board approved edible products. Thank you for your time and consideration in supporting the health and safety of all Alaskans.

Sincerely,

Trevor J. Storrs
President/CEO

Received by AMCO 3.6.21 (late comment)

From: Ian van Tets
To: CED AMCO REGS (CED sponsored)
Subject: Comment on Proposed Regulations Changes (edibles)
Date: Wednesday, March 3, 2021 3:40:27 PM

Dear Sir/Madam,

I am a US citizen, an Alaskan resident, and a physiology professor affiliated with both UAA's biological sciences department and the AK WWAMI school of medical education. I am also the current board president of AK Behavioral Health (formerly Anchorage Community Mental Health Services).

I am writing in my private capacity, and purely in my private capacity, to express my opposition to the proposed changes to the state's marijuana regulations that would increase the amount of THC allowed in a single serving from 5 to 10 mg.

There seems no reason, other than the commercial benefit of the companies that sell edibles, for this change and the change carries with it the increased risk of accidental poisoning for naive users who are trying edibles for the first time and more importantly, for children who happen to mistake edibles for harmless cookies and candies.

The current regulations do not impose any form of hardship on regular users. Regular users who wish to ingest a higher quantity of THC can already do so by simply eating more edibles.

The current regulations do, however, help to protect children and naive users from harm. If the dose per edible cannot exceed 5 mg, a child who eats two or three cannabis infused gummy bears can, at a maximum, ingest 15 mg of THC. The same child under the proposed regulations could potentially ingest 30 mg - effectively doubling the severity of the child's exposure.

By their very nature, edibles are more attractive and pose more of a risk to young children than any other form of marijuana product.

A six year old child is very unlikely to roll and smoke a joint. A six year old child is, however, unlikely to have any inhibitions when it comes to gummy bears - or any other cookie or candy-like edibles.

Accordingly, I urge you to reject the proposed changes and to leave the current regulations unchanged.

Yours sincerely,
Dr. Ian Gerard van Tets

3625 Carleton Avenue, Unit D,
Anchorage AK 99517
Telephone: (907) 632-6395

CED AMCO REGS (CED sponsored)

From: Kevin Fortney <kevinfortney@yahoo.com>
Sent: Wednesday, February 17, 2021 9:24 PM
To: CED AMCO REGS (CED sponsored)
Subject: Stop the increase!!!

Follow Up Flag: Follow up
Flag Status: Completed

Where are all of your heads? Do you not smell cars in front of you smoking pot freely? Almost daily I am behind someone smoking pot in there cars.

I have a room mate who everyone she knows smokes pot and then gets behind the wheel of a car and drives like it is no big deal.

If you idiots want to increase the amount of dosage on any level, this will be on your heads.

I have seen just about zero responsibility from people I know when it comes to staying off the roads.

Liken this to uping the regulated amount of alcohol allowed while driving? Does that make any sense?

The stupidity of the road this nation is going down in incomprehensible. Go ahead, what a great idea to allow what you are considering.

You give an inch the stoners and users will take a mile. They already have. I never see someone raise a beer to their lips while driving but I constantly see stoners using pot in their car.

You are all idiots to even consider this change.

Sent from Yahoo Mail on Android

CED AMCO REGS (CED sponsored)

From: nicole carey <nlcareyak@icloud.com>
Sent: Thursday, February 18, 2021 3:16 PM
To: CED AMCO REGS (CED sponsored)
Subject: THC limits

This is the stupidest thing I have ever heard. Increasing the level of dependence and addiction. When will we learn. I'm very disappointed that it's even legal in this state. And not to mention the edibles, why? Disguised as gummy bears. Disgusting. I hope this ends in failure.
I understand that this is my opinion and that might not count for much, especially for people who like this kind of thing, but I think it's becoming too permissible and too acceptable in our society to be high or find a high to deal with life.

Thanks for asking,
Nicole

Sent from my iPhon

Comments on: NOTICE OF PROPOSED CHANGES ON THC CONTENT FOR EDIBLES IN THE REGULATIONS OF THE MARIJUANA CONTROL BOARD

Submitted By	Comment
3/5/2021 3:15:13 PM Joe Byrnes joe_byrnes@outlook.com Anchorage, AK, US **Anonymous User**	March 5, 2021 Glen Klinkhart Alcohol and Marijuana Control Office 550 W. 7th Avenue, Suite 1600 Anchorage AK 99501 amco.regs@alaska.gov RE: Comments on proposed changes in the THC Content for Edibles in the Regulations of the Marijuana Control Board Thank you for the opportunity to provide comments on the proposed regulation changes regarding raising the THC content for edibles. I remain deeply concerned about the proposal to allowed THC content in a single serving of an edible product from 5 to 10 mg and for a package from 50 to 100 mg of THC total for the following different reasons: 1. Concerns about health. As relayed by the Anchorage Health Department, edible products are the marijuana products most responsible for increases in marijuana-related poison control calls. Edible products, because of their concentrated dosages, are products most commonly associated with neurotoxicity from acute exposure. Furthermore, edible products tend to be more attractive for youth consumption, particularly due to increasingly negative attitudes toward smoking in general. Positive attitudes toward marijuana usage among youth in Colorado continue to trend upward following legalization in that state. If the resulting regulation change causes marijuana edible prices to decrease, then I am further concerned about possibly increasing youth use. The cost of cigarettes tends to be inversely correlated with a reduction in youth cigarette use. I suspect a similar effect occurs with marijuana use among youth. 2. Concerns about public safety. The Anchorage Police Department has also raised concerns about the impact on public safety since marijuana is the second-most detected substance in intoxicated drivers. In recent testimony, APD said that about 30% of drivers involved in traffic fatalities or serious collisions tested positive for THC in their systems. While marijuana proponents point out that alcohol tends to be a more dangerous substance, what we have seen in the years since legalization is many users of marijuana also use alcohol at the same time. Increasing the concentration of THC in edibles, which tend to have a delayed intoxicating effect, is unlikely to have a positive impact on public safety. 3. Impacts on local tax revenues. Local municipalities have benefited from tax revenues generated from marijuana purchases. I do not feel the board has adequately considered the economic effects that changing THC content in edibles will have on local tax revenues. If patrons are buying more THC for a lower price, sales tax revenues could be negatively impacted. Furthermore, like taxes on alcohol and cigarettes, targeted taxes on substances like marijuana are in part intended to offset increased local costs to government services associated with the use of these products. If there is an increased public safety risk from higher concentrated THC edible products, the government costs associated with that increased risk would not equitably passed onto the citizens that a responsible for increasing that risk. I urge the board to reconsider this proposal in light of these concerns and not move forward with increasing the allowable THC content levels in edible products.
3/5/2021 11:14:42 AM Portland, OR, US **Anonymous User**	I would love to see the edible dosage raised to 100mgs/10mgs for myself and other cannabis users.
3/5/2021 7:57:51 AM Wasilla, AK, US **Anonymous User**	I support raising the percentage for edibles. At present, the low limit does not allow for effects to take place for most cannabis users. This is a disadvantage to the consumer, they have to consume a lot of sugar and edible material, rather than gaining the therapeutic effects.
3/4/2021 7:02:25 PM Tahachee Appodaca Appodacatahachee@gmail.com Wasilla, AK, US **Anonymous User**	100 mg serving is the national standard I see no negatives in increasing Alaska's as well. Legal age citizens can purchase as much alcohol as they wish without handholding I think this Is a step in the right direction. Plus cannabis is far less damaging to the community and contributes greatly to the economy.
3/4/2021 6:54:48 PM Brenna Dinkel brenna.dinkel@Gmail.com Wasilla, AK, US **Anonymous User**	I support changing regulations for edible dosage from 5 mg THC and 50mg per package to 10 milligrams THC per serving and 100 per package, 5mg servings are to low for the average consumer and it makes the products over priced and not worth the hassle which I believe is discriminatory against consumers looking for an option that doesn't involve smoking or vaping.
3/4/2021 12:57:22 PM Ashley Siracusa ashleysiracusa@gmail.com	To whom it may concern, I have been the Store Manager of Green Jar in the Matsu since we opened four years ago. Since day one, our number one complaint from our community is the 5mg limit in edibles. The reasoning being that often you have to consume

Submitted By	Comment
Wasilla, AK, US **Anonymous User**	large quantities of the products to get a sufficient dose. This makes it very expensive for the market and consumers and makes it so you have to physically eat large portions. With the 5mg limit, we are not competing with the black market. We often hear from folks that they continue to buy edibles illegally because of this issue. Let's change that! Let's make sure that consumers are buying safe, tested products. Thank you for your consideration, Ashley Siracusa
3/1/2021 3:48:24 PM Lance Roberts Roberts.Lance@gmail.com Fairbanks, AK, US **Anonymous User**	This regulation makes no sense whatsoever. We've already unleased a toxic drug that since legalization in states of the U.S. we've seen an increase in DUIs and fatalities. There is no reason to double the dosage in food items. Please remember that incidents of children accidentally consuming marijuana edibles are still occurring and many children have been recorded as being hospitalized following their consumption of THC. Instead of increasing the danger and lethality of each dose please reject this regulation.
2/14/2021 12:45:59 PM Dara Cameron Kenai, AK, US **Anonymous User**	The raising of the edible limit has been long overdue here in Alaska, and while I do not feel that raising the serving limit from 5mg to 10mg, or a max package limit from 50mg to 100mg is by any means sufficient, I, as a consumer, do feel it is a step in the right direction towards helping me self-medicate in the most cost effective, safe, and legal way possible. Hopefully this change, if passed, will only continue to build supporting evidence of the efficacy of cannabis as a medical aid, as well as prove to those opposed to cannabis, in part or in full, that the consuming public at large can and will be responsible with edible consumption, even if those doses are higher.
1/29/2021 5:07:59 PM Rob Becker robertbecker72381@gmail.com New Smyrna Beach, FL, US **Anonymous User**	Those Limits seem far to low and would end up with people just needing to purchase more often. Personally a single 100mg cookie edible hardly does anything for me.
1/29/2021 9:02:15 AM Peter Kennedy bigdaddychickybaby@yahoo.com Sitka, AK, US **Anonymous User**	We are in full support of the proposed changes to the THC content for Marijuana edibles. Being older we have found that the Marijuana edibles help immensely with our aches & pains, any loss of appetite, and our older age mood swings. Hopefully these changes will decrease the packaging costs and make the Marijuana edibles more affordable not only to those of us on limited incomes, but everyone else who benefits from these products.
1/18/2021 3:20:29 PM Christopher Farris cfarris@greenjarak.com Wasilla, AK, US **Anonymous User**	AMCO Board and Staff, I approve of this regulation change as written. I think it is time that we increase our edible limit and bring it inline with the industry norm that has been established by many other states. The following 7 states currently have an recreational marijuana program that has a 10mg per serving, 100mg per package limit: Washington State, Colorado, California, Nevada, Michigan, Vermont and Maine. Many of these states have been selling edibles at these potencies for many years with no issues and there are no states that have a lower potency limit than Alaska does. I see no logical reason not to increase our edible limits to match what a large majority of the industry thus far is doing. Thank you, Chris Farris
1/13/2021 6:53:42 PM heather t bandgeek907@gmail.com Clackamas, OR, US **Anonymous User**	I support the proposed increase of thc mg per serving to 10mg and packing to 100mg. thank you

TO: AMCO
FROM: Crystal Kennedy
RE: 3 ACC 306.560 and 3 ACC 306.645 (b)(1)

Dear Marijuana Control Board,
In providing this written testimony on this topic of increasing the amount of THC content in edible marijuana products, I am giving this testimony as a resident of Eagle River, the Municipality of Anchorage and the state of Alaska. Though I also serve as a member of the Anchorage Assembly my testimony does not represent any official opinion or action by the Anchorage Assembly.

As one of the co-chairs of the Anchorage Assembly's Community and Economic Development Committee, I received the notification from our licensing clerk. When I realized that no other departments in the Municipality receive such notifications, I forwarded it to the Anchorage Police Department (APD) and to the Anchorage Health Department (AHD) asking for any comments that they wanted to share on the topic at the committee's next meeting. Both agreed to do so right away.

Both APD and AHD responded at the committee meeting opposing the increase. Both speakers cited the potential for increased risks to public health and safety including increased incidents of fatal vehicular accidents, drug overdoses due to over consumption, and ingestion by children or those under the legal age.

At that same committee meeting the members discussed the idea of drafting comments and sending them to the Marijuana Control Board but in a 5-1 vote decided to wait until the State actually made that decision and allow the Assembly to decide how to deal with the potential changes the state might make. That committee decision, however, was made before the Anchorage Health Department issued an official policy statement that opposes the increase. The policy states that opposition is based on evidence that says that edible consumption of marijuana has more health risks including overdosing and poisoning than consumption by inhalation and carries even more of a health risk to young people. That policy is attached for your review.

After the AHD issued their official policy statement I offered a resolution to oppose the THC increase before the entire Assembly but it was postponed so no action was taken in support of or opposition to the resolution. I recognize there were probably politics involved with the lack of a formal decision due to connections with campaign funding by the marijuana industry but the process followed has, at the least, made us all aware of the expected negative impacts of this potential change.

The week after the postponement of the resolution and during the Assembly's Public Safety Committee, of which I am also a co-chair, the Municipal Department of Law stated that, of the OUI cases they prosecute, half of them are related to marijuana consumption. They stated that they feared that increasing the THC content in edibles would only serve to increase the number of cases of OUIs.

With two of our safety and health related departments opposing such a change in the state regulations for marijuana edibles and the Municipal Department of Law stating their concerns, I am presenting that information to the Board. I share those concerns for public safety and public health over the potential negative impacts within my community. With that, I am stating my personal objection to the proposed change.

Thank you for your consideration and I am happy to answer any questions or provide any other information that you may request.

Kindest regards,
Crystal Kennedy
20040 New England Dr.
Eagle River, AK 99577
907-351-1430

Anchorage Health Department

Policy Recommendation

Amending 3 AAC 306 of the Alaska Administrative Code to increase allowable THC content in edible marijuana products

Policy:

The Marijuana Control Board has proposed amending the Alaska Administrative Code to allow marijuana edible product servings to contain not more than 10 mg of tetrahydrocannabinol (THC)[i] and a single packaged unit to contain not more than 100mg of THC, an increase over the current 5mg and 50mg THC content restrictions. The Anchorage Health Department does not support this proposed change, due to its potential effects on public health.

Justification:

Research suggests that the negative effects of cannabis on the body and brain are primarily due to THC. Thus, products with higher concentrations of THC are likely to confer greater risks.[ii] Indeed, consuming marijuana with higher concentrations of THC can cause panic attacks, paranoia, psychotic episodes, massive vasoconstriction, and cannabinoid hyperemesis syndrome, which causes vomiting and intense abdominal pain and often requires emergency treatment.[iii] Levels of THC exposure are also positively associated with cannabis dependency,[iv] and available evidence suggests that youth are at particular risk for developing a cannabis use disorder, particularly if they begin cannabis use earlier in adolescence and use at a high frequency and magnitude.[v]

The risk to youth of high-THC products may be greater as perceptions of harm from marijuana continue to decrease nationwide and in Alaska, where young people are less likely to perceive marijuana as harmful compared to the national average.[vi] At the same time, about half of the marijuana-related poison center calls in 2017 in Alaska (n=31) were for people under the age of 20, and over 75% of these were for youth ages 13-19.[vii] Furthermore, evidence suggests that states that have decriminalized cannabis have seen increases in calls to poison control centers and hospital visits for cannabis-related poisoning of young children, the majority of whom have ingested an edible product.[viii] Michigan, the state with the highest allowable THC-content in edibles (50mg/serving), saw an over 600% increase (6 to 46 cases) in the number of poison control reports for children who ingested a THC edible between 2017 and 2018, when recreational marijuana sales were legalized in the state. In 2019, that number of calls rose again to 59, even as overall pediatric calls to poison control fell.[ix] These data suggest that higher concentrations of THC in edible products could present a greater risk to these young children, particularly if edibles look like candy or other food products.

Finally, available evidence suggests that edibles can cause greater adverse health outcomes than inhaled marijuana.[x] In a 2019 Colorado study, researchers found that edibles were more likely to cause severe intoxication, acute psychiatric symptoms in people with no history of psychiatric illness, and cardiovascular problems than inhaled cannabis. While edibles

represented 0.32% (21.2 million units at 10mg THC/unit) of Colorado's cannabis sales (by weight) between 2014-2016, they accounted for about 10.7% (n=219) of cannabis-triggered visits to the University of Colorado Hospital Emergency Department.[xi] The risk of poisoning or overdose from an edible can be higher than from smoked cannabis, because ingested marijuana takes longer to produce a drug effect (peak blood levels in 3 hours) than does smoked marijuana (peak blood levels in 30 minutes), making it more difficult for the user to titrate the correct dose.[xii] This risk could be especially high for young people and those who have less experience with marijuana, if the consumer does not understand the delayed effect of an edible and consumes an unsafe amount of the product. Moreover, a 2017 study of Canadian youth found that young people had little to no context for interpreting THC numbers on edible packaging, a factor that may compound the risk of accidental overdose.[xiii] This emerging research indicates that edibles, and particularly edibles with high levels of THC, should be regulated carefully to mitigate risks to public health.

Scientists who study the effects of marijuana on mental and physical health outcomes recognize that this is an emerging area of research, and there is much that the scientific community still does not understand about cannabis.[xiv] In particular, there is a dearth of evidence on higher THC-containing products and their effects on brain structure, function, and cognitive performance.[xv] In 2019, for example, the Canadian Medical Association urged the government of Ottawa to lower the maximum allowable THC level in edibles from 10mg per serving to 5mg, for these reasons.[xvi] This lack of research makes moving forward with this policy change imprudent at this time.

Complications and Unknowns:

Of the eleven states where recreational marijuana use is legal,[xvii] the great majority have THC content limits of 10mg per serving and 100mg per package. Only two states – Alaska and Oregon – have a THC content limit of 5mg per serving and 50mg per retail package. Massachusetts limits THC content to 5mg per serving, but allows up to 20 servings (100mg THC) per retail package.

THC Content Limits in Edibles	State (date of legalized recreational use)
5 mg per serving, 50mg in single package (10 servings/package)	Alaska (2014) Oregon (2014)[xviii]
5 mg per serving, 100mg in single package (20 servings/package)	Massachusetts (2016)[xix]
10mg per serving, 100mg in single package (10 servings/package)	Washington (2012)[xx] Colorado (2012)[xxi] California (2016)[xxii] Maine (2016)[xxiii] Nevada (2016)[xxiv] Vermont (2018)[xxv] Illinois (2019) [xxvi]
50mg per serving, 500mg in single package (10 servings/package)	Michigan (2018)[xxvii]

It is notable that most states that have legalized recreational use of marijuana have set the THC limit for edibles at 10mg per serving. That said, as evidenced by the date of legalization for each

state (which often precedes actual implementation of the law by a year or more), these are relatively new policies. Thus, it may prove challenging to draw firm conclusions regarding the public health impact of these policies.

References:

[i] Tetrahydrocannabinol, the primary psychoactive compound in marijuana.

[ii] Hammond, David. "Communicating THC levels and 'dose'to consumers: implications for product labelling and packaging of cannabis products in regulated markets." *International Journal of Drug Policy* (2019): 102509.

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[iii] Monte, Andrew A., Richard D. Zane, and Kennon J. Heard. "The implications of marijuana legalization in Colorado." *Jama* 313.3 (2015): 241-242.

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[iv] Curran, H. Valerie, et al. "Which biological and self-report measures of cannabis use predict cannabis dependency and acute psychotic-like effects?." *Psychological medicine* 49.9 (2019): 1574-1580.

[v] Gruber, Staci A., and Kelly A. Sagar. "Marijuana on the mind? The impact of marijuana on cognition, brain structure, and brain function, and related public policy implications." *Policy Insights from the Behavioral and Brain Sciences* 4.1 (2017): 104-111.

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From: Tracie Rieker <tjrieker@hotmail.com>
Sent: Thursday, February 18, 2021 10:25 AM
To: CED AMCO REGS (CED sponsored)
Subject: Doubling thc

Do we really think that is best idea Maybe if we keep
People stoned they won't care about all the political nonsense taking place

Sent from my iPhone