

Dear Commerce and Consumer Protection Committee: Jan. 25, 2023

Why does the Legislature want to commercialize a potent, mind-altering drug when we already have an addiction epidemic in our society?

Legalizing recreational cannabis will harm Minnesotans. International health experts (International Journal of Drug Policy, 2022) report that “there is no universally safe level of cannabis use.”

Published research and other reports show that legalization leads to an increase in cannabis use and cannabis use disorder, especially among youth and young adults. Cannabis is an intoxicating, addictive drug that impairs driving ability, reduces workplace safety, and may cause psychosis, suicidal ideation, and other mental health disturbances, especially in youth. THC disrupts brain development in teens and young adults. Simply, it is not a safe drug. Warning labels especially for pregnant women and those under 25 must be included if commercialized.

As you can see from the attachment on **Pediatric Health**, exposures to cannabis via edible products has increased over 1000 % in 2021 in children under 6 years of age. There has been little, if any, education of the public regarding the dangers of this drug. Consideration of a potency cap must be considered if legalization is considered.

Further, the **Edibles Handout** shows how products that look like sugar candy with 5mg per serving and a max of 50mg per package could tempt someone to eat an entire package (before getting high) and thus become very sick, possibly requiring medical attention.

Please do everything to STOP legalization of cannabis. The harms outweigh the benefits.

Thank you,

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Evidence mounts that young children are not being protected from THC Hemp-derived edibles

This research report from *Pediatrics* (Tweet et al., 2023) takes a very rigorous look at this issue. The authors evaluated trends for the years 2017-2021 in pediatric cannabis edible ingestions in children younger than age 6 years with regard to toxicity, medical outcome, and health care utilization for the years 2017–2021.

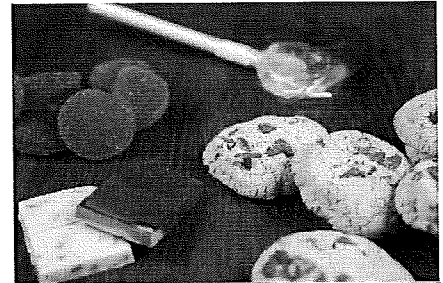
Specifically, the authors analyzed **data from the National Poison Data System for pediatric exposures to edible cannabis products in children less than 6 years.**

The analysis focused on incidence (that is, new cases), common clinical effects, medical outcomes, health care utilization, and changes in acute toxicity between the pre-COVID years (2017–2019) to the COVID years (2020–2021).

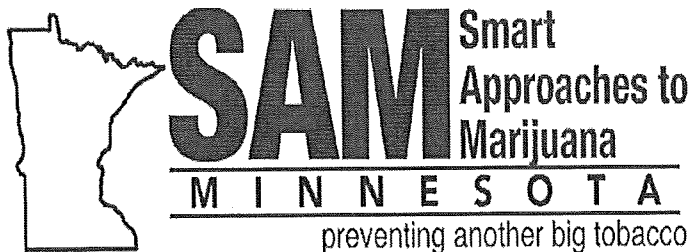
There were a total of 7,043 exposures reported during 2017–2021. A striking finding was that **in 2017 there were 207 reported cases, but in 2021 there were 3,054 cases, an increase of 1,375.0%.**

Most exposures (97.7%) occurred in a home setting. Of all reported cases, 22.7% of child patients were admitted to the hospital, and for cases that were followed, 70% of the children were known to have suffered “central nervous system depression.”

As the authors note, this increase in pediatric edible cannabis exposures, with the potential for significant toxicity, is **a major pediatric health issue.**



Examples of THC Cannabis products from legal states.





SAM Smart Approaches to Marijuana

MINNESOTA

preventing another big tobacco

As of July 1st, MN law now allows THC (Delta-9 and Delta-8) edibles derived from hemp up to:

- 5 mg per serving
- 50 mg per package

Compared to smoking/vaping, the acute effects of edibles are:

- Later onset of effects
- Longer lasting effects

As of August 1st, MN Medical Cannabis program now allows edibles after consultation with a doctor.

Manufacturers' requirements:

- Testing of all products
- Must be 21 or older to purchase products
- Labels must contain
 - Name, address, and phone number of manufacturer and testing lab
 - Accurate statement of amount of cannabinoids
 - Statement that the product does not claim to diagnose, treat, cure, or prevent any disease and has not been evaluated or approved by the FDA
- Packaging and product must not bear the likeness or contain cartoon-like characteristics that appeal to children
- Cannot be packaged in a way that resembles other trademarked products or product-specialized packaging of any commercially available food product.

Edibles dosage

Leafly

THC per base	What to expect	Who's it for?
1-2.5 mg	<ul style="list-style-type: none"> • Mild relief of pain, stress, anxiety, and other symptoms • Improved focus and creativity 	<ul style="list-style-type: none"> • First-time consumers • Microdosers
5 mg	<ul style="list-style-type: none"> • Stronger symptom relief • Euphoria • May impair coordination and alter perception 	<ul style="list-style-type: none"> • Recreational consumers • Patients with persistent symptoms • Restless sleepers
10 mg	<ul style="list-style-type: none"> • Stronger euphoria • May impair coordination and alter perception • New consumers may experience negative effects 	<ul style="list-style-type: none"> • High tolerance THC consumers (both recreational and medical)
20 mg	<ul style="list-style-type: none"> • Very Strong euphoria • Likely to impair coordination and alter perception 	<ul style="list-style-type: none"> • Consumers with significant THC tolerances • Patients with decreased GI absorption
50-100 mg	<ul style="list-style-type: none"> • Seriously impaired coordination and perception • Can cause unpleasant side effects including nausea, pain, and rapid heart rate 	<ul style="list-style-type: none"> • Experienced, high-tolerance THC consumers • Patients living with cancer, inflammatory disorders, or conditions that necessitate high doses

Please Note: This graph is for educational purposes only. SAMMN does not recommend the use of edibles for ANY medical purposes without FDA approval.

The current version of the Hemp-THC-Edibles bill does NOT have provisions for:

- Taxes
- Treatment
- Prevention and education
- Workplace testing
- Highway Safety
- Funds for monitoring and enforcement
- Penalties for illegal sale and possession violations
- Where products can be sold (most states mandate THC products be sold exclusively at dispensaries, which means they are not available at stores alongside commercial tobacco products and candy, etc.)

Does NOT have:

- Requirements for package health warnings (except to keep away from children)
- Restrictions or regulations for advertising products
- Limits on number of and location for dispensaries
- Training requirements for individuals dispensing the product