

Doctors for Cannabis Regulation
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April 14, 2017

The Honorable Jim Cooper
California State Assembly
State Capitol, Room 5158
Sacramento, CA 95814

Re: AB 1606 (Cooper) — LETTER OF SUPPORT

Dear Assemb. Cooper,

Doctors for Cannabis Regulation (DFCR) is the country's first and only national organization of physicians dedicated to the legalization, taxation and regulation of cannabis for adult use across the United States. We do not promote the use of cannabis. We simply believe it ought to be treated as a public health issue outside the criminal justice system. In a post-legalization environment like that of California, evidenced-based regulation and education are the best ways to protect that public health.

This is why DFCR supports AB 1606, which enhances the state's health and safety standards for cannabis-infused products sold within the State of California. With the passage of the Control, Regulate and Tax Adult Use of Marijuana Act (Proposition 64) last year, California's cannabis industry needs a strong statutory and regulatory framework, in addition to rigorous testing protocols, to ensure consistency and accuracy of labeling.

Existing law under the AUMA prohibits the sale of cannabis products unless a representative sample has been tested by a certified third party to determine the safety of the product. While we believe this is a strong start, the AUMA requirements omit other factors that should also be tested. Amongst additional regulations being drafted to implement the AUMA requirements, we believe AB 1606 is essential to resolving several gaps in the current law to better protect consumers from unexpected potency or overdosing.

AB 1606 would require manufacturers and producers to obtain third party certification that tests for: (1) the accuracy of the labeled dosage of the product within 15 percent, and (2) uniform disbursement of cannabinoids throughout the product.

Overlooking these factors has led to tragic results in other states that legalized adult use cannabis before California. Last year, Colorado Governor Hickenlooper cited a spike in emergency room visits by consumers who ingested cannabis-infused products in the State of Colorado, which legalized marijuana in 2012. Moreover, a recent study published by the *Journal of the American Medical Association* found that only 17 percent of the 75 tested edible cannabis

products delivered the potency of the Tetrahydrocannabinol (or THC, a major cannabinoid) reported on their label. Over-dosing and under-dosing are of great concern.

Heeding the lessons of other states, California needs a clear statutory and regulatory framework to ensure cannabis products are accurately labeled for dosage and deliver reliable, consistent potency. From the first serving of a cannabis-infused edible product to the last, each serving should deliver the same dosage, which should be accurately indicated on the label. AB 1606 would require that manufacturers meet these basic standards in order to safeguard the health and safety of consumers.

For these reasons, we are happy to support AB 1606.

Sincerely,

Doctors for Cannabis Regulation

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