

U.S. HEMP ROUNDTABLE'S REPORT TO CONGRESS: FEDERAL REGULATION NEEDED URGENTLY TO HONOR COMMITMENT TO U.S. HEMP FARMERS

In passing the 2018 Farm Bill, Congress made clear its intent to support the production and sale of hemp and hemp derivatives such as CBD.¹ Thousands of U.S. growers planted hemp in response, with farming for CBD representing the overwhelming majority of all hemp acreage.² (Even as of 2021, floral hemp production for cannabinoid-based products still accounts for approximately 75% of total hemp production.)³ However, public statements by FDA officials arguing that it is illegal to sell ingestible hemp-derived CBD products have taken their toll on the industry. While the agency has primarily taken action against companies that have made improper disease claims, and while FDA officials have announced that they are investigating a regulatory pathway for CBD products, CBD commerce and investment have been chilled due to the absence of federal regulation, impairing economic opportunity for farmers and small businesses:

- The current regulatory gray area has stifled significant hemp market opportunities for farmers and businesses. State and local agencies have threatened and/or taken enforcement actions against the sale of CBD products, citing FDA guidance. Many big-box retailers are reluctant to carry CBD products due to FDA's position, while the nation's top food companies have delayed efforts to introduce new CBD products into the marketplace.⁴
- Chilled and stagnant CBD commerce has resulted in a continuing oversupply of hemp biomass and derivative products, such as crude oil, with hemp commodity prices dropping sharply, adversely impacting hemp farmers. According to independent reporting agency Hemp Benchmarks, aggregate prices for hemp CBD biomass, crude oil and CBD isolate declined 90-94% between April 2019 and December 2021. (See Figures 1-4). While prices stabilized somewhat in late 2021, any significant and sustained price increases are not expected in the foreseeable future, barring regulatory clarity.
- Regulatory uncertainty has resulted in a severe downturn in US hemp production. In 2021, roughly 200,000 acres were registered with state hemp programs, down more than 50% compared to 430,000 acres registered in 2020.⁵ Of those registered, only 54,200 acres were grown across the country in 2021, representing a 50-75% decline in acreage dedicated to hemp production from 2019-2020.⁶ And of the hemp grown, a much smaller portion was actually harvested: Colorado, for example, planted more than 10,000 acres of hemp, but only harvested 31 percent of it.⁷ And just because a farmer managed to harvest hemp doesn't mean the hemp was successfully sold: Despite significantly less supply coming to the market, observed wholesale prices remain depressed. (See Figures 1-4).
- The COVID-19 crisis also weighs heavily on hemp farmers. The pandemic has led to significant increases in shipping costs; for example, Hemp Benchmarks reported that average costs to ship bulk hemp products increased between 22-94% during 2021.⁸ While hemp farmers were finally deemed eligible by the USDA for Coronavirus Food Assistance Program funds in September 2020, the benefits were much less generous than most other crops, paying only \$15/acre of 2020 crops.⁹ Unlike other segments of the economy, the hemp extract market did not bounce back from a 2020 COVID-related sales slump: one economic study pegs the growth of U.S. CBD sales at only 2.5% in 2021, barely recouping an estimated 2.0% downturn in 2020, and a far cry from the meteoric annual growth observed pre-pandemic.¹⁰
- Plummeting hemp and CBD prices, COVID disruptions and an oversupply of biomass have led to another challenge: Struggling farmers and businesses have pivoted to selling compounds, such as Delta-8 THC, which are produced by chemically converting hemp-derived CBD biomass. These products, sold at retail under the guise of hemp and often marketed for their intoxicating effect, raise serious health and safety concerns, especially for minors.¹¹
- At least three major hemp companies have filed for bankruptcy, including Atalo Holdings¹², GenCanna Global¹³, and Elemental Processing.¹⁴ In each instance, regulatory uncertainties were cited as a leading cause of bankruptcy. Atalo and GenCanna specifically attributed their bankruptcies to declining sales, closing markets, and frozen investment in the time since the release of FDA's public comments.¹⁵
- At the same time, major banks and payment processing services, including Chase and PayPal, are refusing to onboard hemp and CBD companies, citing regulatory uncertainty. Some, like Visa, are even levying significant penalties against financial services providers that process hemp and CBD transactions, which has caused merchants' accounts to be suspended. As a result, farmers and hemp companies are

being left without critical financial and merchant services, further compromising their farms and businesses. Impacts are not limited to the hemp CBD industry, but are also being felt by hemp fiber and grain companies, and even hemp non-profit organizations and ancillary hemp industry service providers. Further, private investment in the industry has dried up; there's been a "precipitous decline" in M&A deals.¹⁶

- There are becoming fewer outlets for hemp companies to advertise their products, providing an additional barrier to entry into consumer markets. Facebook, for example, has prohibited ads marketing ingestible CBD products, citing FDA's pronouncements. Facebook even prohibits the marketing of non-CBD hemp products if ingestible CBD is mentioned anywhere on a company's website.¹⁷
- There is also a disturbing trend in hemp-related litigation across the country. More than a dozen class action lawsuits regarding CBD have been filed, citing FDA's public statements as grounds for injury.¹⁸ Even more cases have been brought by farmers against processors for non-payment and breaching hemp contracts.¹⁹ These lawsuits are tying up cash and disrupting business operations and supply chains.
- Federal and state political leaders of all stripes have repeatedly called on FDA to issue formal regulations for CBD in dietary supplements and food. U.S. Senate Majority Leader Mitch McConnell and Senator Ron Wyden have each urged FDA to take expedited action,²⁰ while Kentucky Commissioner of Agriculture Ryan Quarles has insisted that FDA end its "bureaucratic paralysis." Quarles witnesses FDA's inaction as "preventing growth in the hemp marketplace...Promising potential markets remain closed while crop production has increased. When there is a surplus of crop and it begins to pile up, the result is obvious: crop prices will fall."²¹
- FDA is acutely aware of the broad public support for CBD regulations, but has been unwilling to act. Former FDA Commissioner Scott Gottlieb testified that "[FDA] heard Congress loud and clear...Congress wants there to be a pathway for CBD to be available."²² Former FDA Commissioner Stephen Hahn stated it would be a "fool's game" to try to completely shut down the CBD marketplace.²³ Former Acting Administrator Janet Woodcock has tried to combat the perception that FDA is opposed to CBD in dietary supplements as a matter of policy. However, she argues that the "law is very clear about this, and so it puts us in a stalemate position."²⁴ At a May 2022 congressional hearing, current FDA Commissioner Robert Califf testified to his disappointment in the lack of agency action on CBD, and expressed his interest in developing a regulatory path, asking Congress for broader regulatory powers: "I don't think the current authorities we have on the food side or the drug side necessarily give us what we need to have to get the right pathways forward...We're going to have to come up with something new. I'm very committed to that."²⁵

REGULATION MEANS SAFETY: FDA also argues it is hesitant to act because it has not yet accumulated sufficient safety data on CBD. However, public safety data is compelling, and regulation is the only approach to ensuring public health and safety:

- There's a growing body of evidence, including data published by the industry, demonstrating that hemp-derived CBD, especially at the levels found in many dietary supplements and food, is generally safe.²⁶ While FDA has listed liver injury as a concern, a published 2021 clinical study, updated with more compelling evidence in 2022, demonstrated that CBD does not pose significant safety concerns at the levels typically found in many dietary supplements and food and that also addresses specific safety concerns raised by FDA ("no evidence" of liver toxicity).²⁷ Scientific experts have recognized that data already exists to determine that hemp extracts containing CBD can be Generally Recognized as Safe (GRAS).²⁸ And despite a notable increase in the use of these products, the number of reported adverse events continues to be remarkably low.²⁹
- Other international regulatory bodies have reviewed the same publicly available evidence and determined that CBD products can be safely marketed. The World Health Organization determined that pure CBD is "generally well tolerated with a good safety profile" and presents little risk of abuse or dependency potential, recreational use, or public health-related problems.³⁰ Australia's Therapeutic Goods Administration concluded that CBD "presents a good safety and tolerability profile,"³¹ and approved CBD products, up to a maximum of 150 mg/day, for use in adults, to be supplied over-the-counter by a pharmacist, without a prescription.³² United Kingdom's Food Standards Agency determined that CBD products can be regulated and marketed as novel foods, provided they meet standards for safety and content, recommending a 70mg daily limit for healthy adults.³³
- Recognizing CBD's safety as well as the need for consumer protection, a majority of U.S. states now provide explicit legal protection for the sale of ingestible hemp-derived CBD products, and new regulatory regimes have emerged in the nation's largest wellness markets, such as California, New York, Florida and Texas.³⁴ While this is good news for farmers and consumers in these states, the cloud of federal legal uncertainty looms over interstate commerce. Worse, according to a recent Consumer Brands Association study a contradictory state

patchwork of laws and regulations have led to deep public confusion and impose significant compliance burdens on farmers and manufacturers.³⁵

- The most pressing safety problem is, as independent studies demonstrate,³⁶ and as FDA recently reported to Congress,³⁷ without a clear regulatory framework, bad actors are selling products without appropriate safeguards and misleading consumers with false label claims. Further, as discussed above, regulatory uncertainty for CBD has led many struggling farmers and businesses to pivot to market intoxicating products such as Delta-8 THC, prompting FDA warnings that they pose significant consumer health and safety risks, particularly for minors.³⁸ Regulation on CBD would not only relieve the economic pressure that is leading to this product shift, but it would also ensure that the dietary supplement lane is limited to non-intoxicating hemp ingredients.

REGULATION PORTENDS A BRIGHT FUTURE: Once FDA does legally recognize and regulate CBD products, the hemp industry can partner with the agency to provide a needed financial jolt to a nation emerging through economic recovery. Regulatory relief for the hemp-derived CBD industry constitutes an economic stimulus package for the nation's farmers and small businesses without requiring one dime from the American taxpayer:

- A recent economic study estimates the market for CBD products to hit \$5 billion in 2022, but there are two very different scenarios for future revenues. If FDA issues regulatory guidance by the end of 2024, the study projects the market will top \$11 billion by 2027. But if there's no FDA action, CBD sales are expected to be more than \$4 billion lower in five years.³⁹ An earlier analysis projected a CBD sales range of \$4 billion to \$16.5 billion by 2025, the higher end dependent on favorable FDA regulations.⁴⁰ A third study projects CBD sales to reach \$19.5 billion by 2025, with mainstream retail exceeding \$15 billion annually, but that's based on a prediction that FDA will regulate CBD as a food additive in 2022.⁴¹ Other hemp constituents, such as CBG and CBN, are also providing new economic opportunities for U.S. farmers and could flourish in a regulated system.⁴²
- Wider availability through additional retail venues and product manufacturers would address consumer demand and help stabilize hemp prices, posing tremendous economic opportunity to U.S. farmers struggling through the pandemic. One economic study forecasted that hemp sown for CBD could potentially generate substantially more revenue per acre than corn.⁴³ Clear laws and regulations would also empower farmers to get out of the court system and into the hemp fields, with more secure access to banking, merchant services, and marketing opportunities.
- Unlike many existing industries that will have to rebuild over the next few years to achieve their previous stature, the hemp industry needs no ramp-up period; sales would surge once regulations are in place. Unlike existing industries that will struggle to return workers to their jobs, the hemp industry will offer brand new jobs immediately in agriculture, manufacturing, distribution, retail, testing and other fields that serve the hemp supply chain.
- Limiting CBD to a drug-only path remains a deeply anti-consumer approach. CBD is only FDA-approved for very rare medical conditions, and costs patients up to \$35,000/year.⁴⁴ A drug-only path would block access for the millions of Americans want to use non-prescription hemp-derived CBD to help manage their everyday health and wellness. CBD can coexist as an ingredient in both drugs and supplements, but under different regulatory frameworks just like fish oil, niacin, caffeine, menthol, and many other natural ingredients do today. Dietary supplement regulations are intended to strike a balance between consumer safety and consumer access. If vitamins, minerals, and botanicals were regulated like drugs then they would be too expensive for the millions of people that use them for good health.⁴⁵ CBD regulated as a dietary supplement provides appropriate consumer protections, quality control and transparency. Supplement regulations require manufacturers to conduct pre-market safety evaluations and to follow FDA's guidelines for manufacturing and testing, as well as maintain post market surveillance for adverse events.
- A partnership in which FDA regulation is complemented by industry initiatives such as U.S. Hemp Authority self-regulation⁴⁶ also helps ensure that consumers can purchase safe, transparent, quality-assured products.

HEMP PRICING DATA

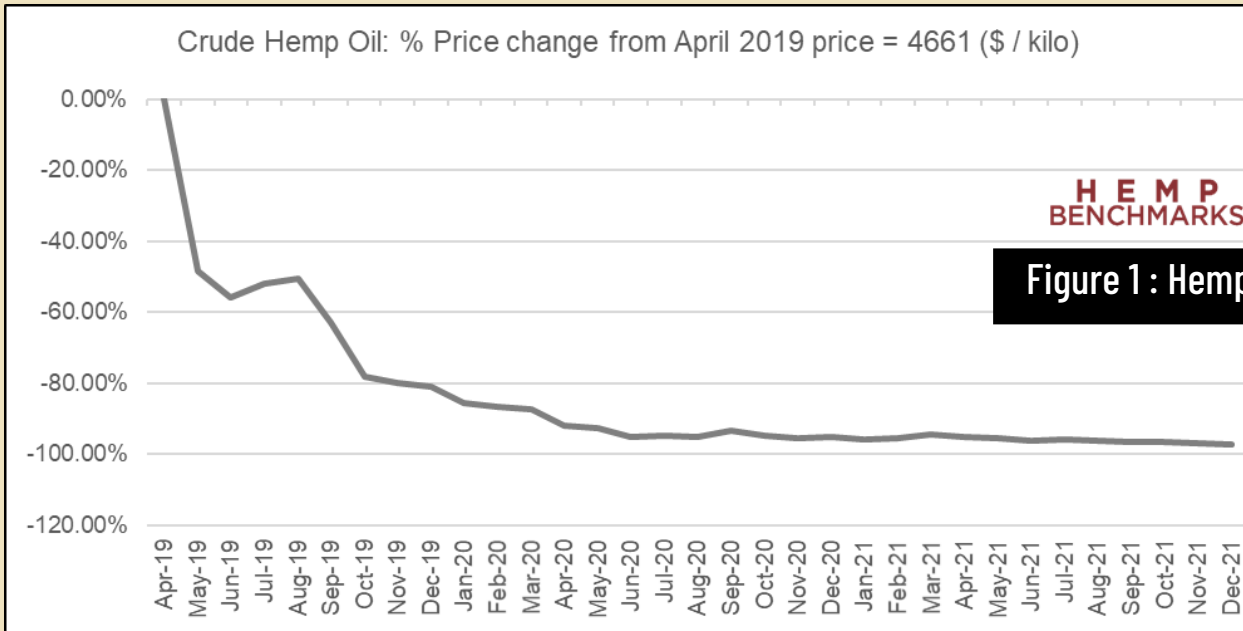


Figure 1 : Hemp Benchmarks®

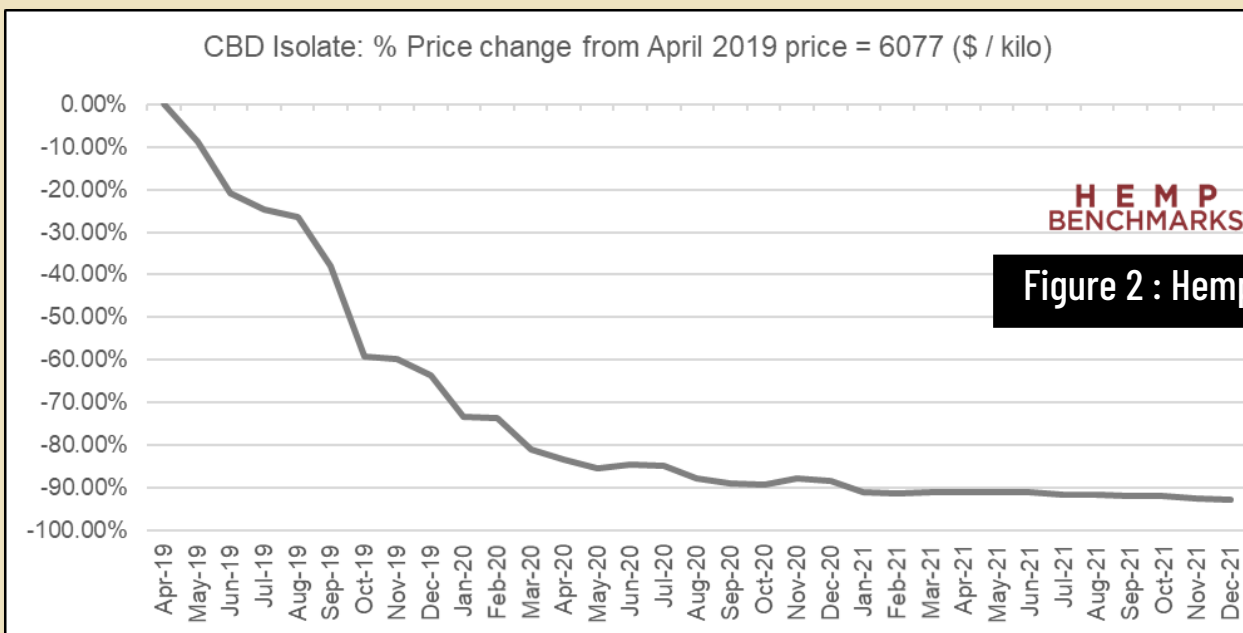


Figure 2 : Hemp Benchmarks®

HEMP PRICING DATA

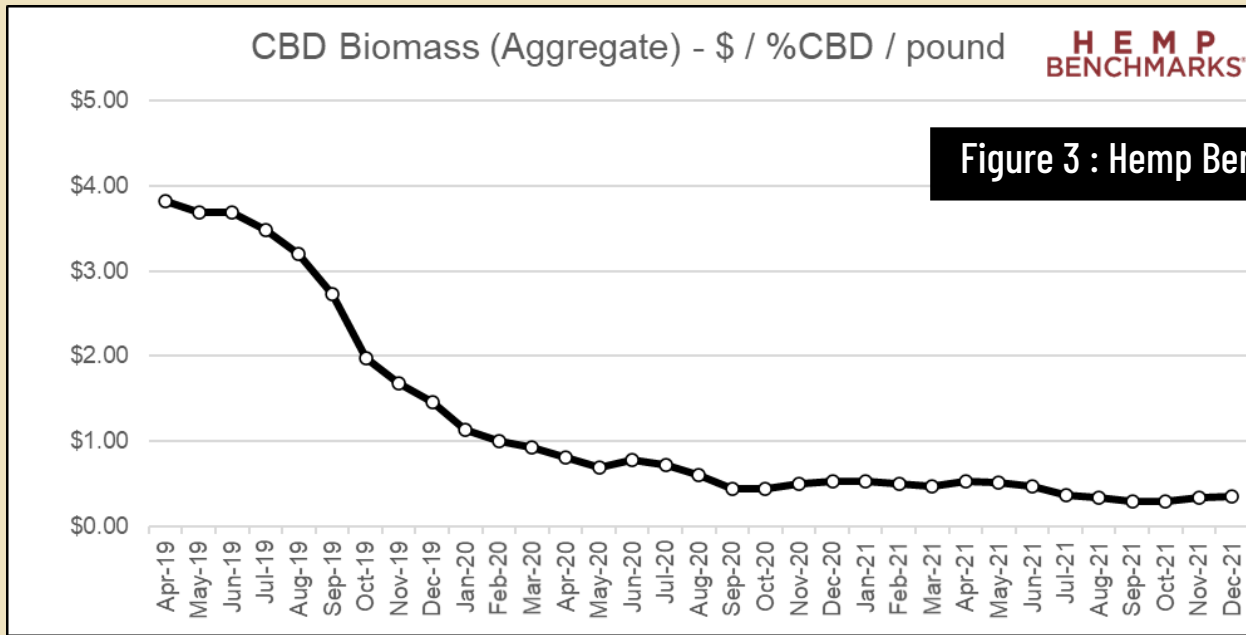


Figure 3 : Hemp Benchmarks®

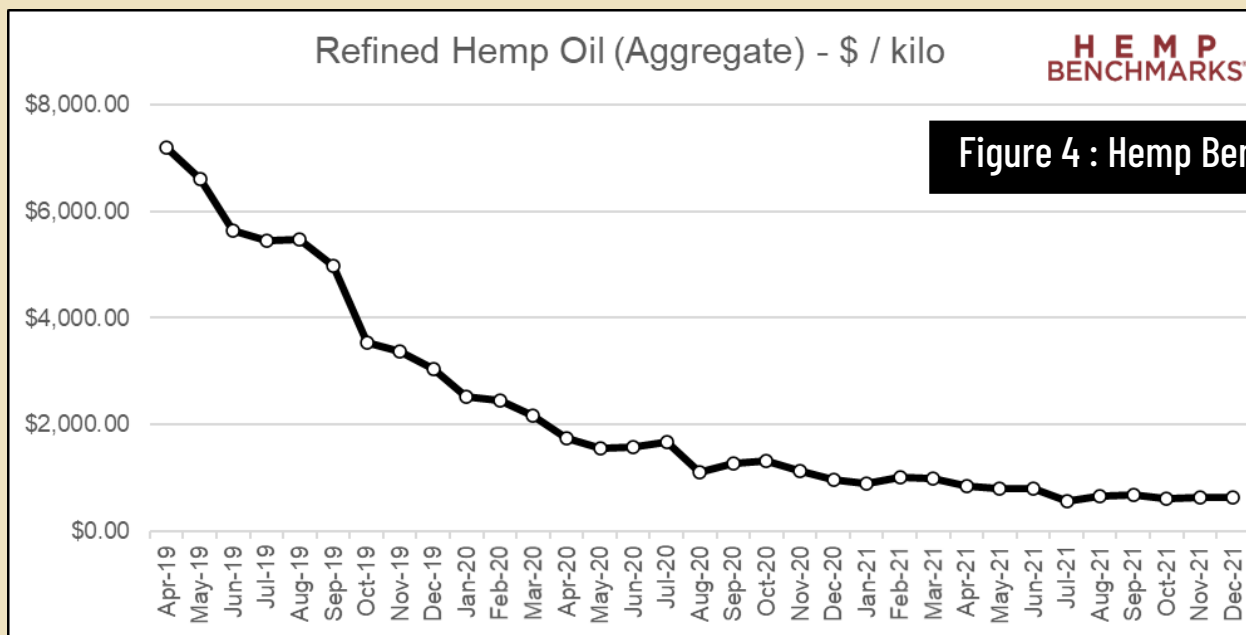


Figure 4 : Hemp Benchmarks®

- ¹ <https://www.mcconnell.senate.gov/public/index.cfm/pressreleases?ID=0B71B14E-5F77-4283-9084-561F67EFBC70> (Senate Majority Leader Mitch McConnell: "Congress' intent was clear with the passage of the Farm Bill that these products should be legal, and our farmers, producers and manufacturers need clarity as well as a workable pathway forward regarding the Agency's enforcement and potential regulatory plans for certain CBD products"); <https://www.wyden.senate.gov/download/062519-wyden-letter-to-fda-hhs-on-hemp-cbd-> (Senator Ron Wyden: "The passage of the 2018 Farm Bill is Congress's clear intent to further advance and support the domestic production and sale of hemp and hemp derivatives like CBD.")
- ² <https://www.reporterherald.com/2020/05/18/enthusiasm-leads-to-oversupply-of-hemp-in-colorado/> (Colorado: 79% of acreage in 2020 dedicated to hemp grown for CBD products.); <https://www.kyagr.com/marketing/hemp-overview.html> (Kentucky: 92% of hemp acreage grown for CBD in 2019.)
- ³ [National Hemp Report 02/17/2022 \(usda.gov\)](https://www.usda.gov/national-hemp-report-02-17-2022)
- ⁴ <https://www.barrons.com/articles/hemp-cbd-demand-is-poor-prices-are-falling-in-a-blow-to-farmers-51580482811> ("Consumer packaged-goods giants like PepsiCo (PEP) and big retailers like Walmart (WMT) haven't committed to CBD-laced products. A big reason is concerns voiced by the U.S. Food and Drug Administration, which says it can't permit the biologically-active ingredient in food and drink without tests of CBD's safety.")
- ⁵ [Hemp Benchmarks, Hemp Spot Price Index Report, Dec 2021](https://www.usda.gov/hemp-benchmarks-hemp-spot-price-index-report-dec-2021)
- ⁶ [National Hemp Report 02/17/2022 \(usda.gov\)](https://www.usda.gov/national-hemp-report-02-17-2022); compare to: [VH_2020_Crop_Report_final \(votehemp.com\)](https://www.vote hemp.com/VH_2020_Crop_Report_final)
- ⁷ [National Hemp Report 02/17/2022 \(usda.gov\)](https://www.usda.gov/national-hemp-report-02-17-2022)
- ⁸ [Hemp Benchmarks, Hemp Spot Price Index Report, Dec 2021](https://www.usda.gov/hemp-benchmarks-hemp-spot-price-index-report-dec-2021)
- ⁹ <https://www.farmers.gov/cfap>; See also <https://hempindustrydaily.com/hemp-industry-daily-taking-stock-of-how-coronavirus-has-affected-farmers-businesses/> (54% of hemp companies have reported that applications for COVID-19 relief funds have gone unanswered, and another 29% report their applications being denied outright or relief loans going unfulfilled.)
- ¹⁰ [Brightfield Group, US CBD Market Industry Update, October 2021.](https://www.brightfieldgroup.com/US-CBD-Market-Industry-Update-October-2021)
- ¹¹ [What Is Delta-8-THC?: The Hemp Derivative That's a Hot Seller - The New York Times \(nytimes.com\); https://www.politico.com/news/2021/03/27/rise-of-delta-8-thc-478215](https://www.nytimes.com/2021/03/27/us/politics/delta-8-thc.html)
- ¹² <https://www.forbes.com/sites/davidcarpenter/2020/03/18/hemp-company-files-for-bankruptcy-as-confounding-regulatory-guidelines-hamper-growth/#417b60955794>
- ¹³ <https://www.winchestersun.com/2020/02/06/gencanna-files-for-chapter-11-bankruptcy/>
- ¹⁴ <https://hempindustrydaily.com/kentucky-extractor-elemental-processing-files-for-bankruptcy-protection/>
- ¹⁵ <https://www.thefencepost.com/news/gencanna-exec-blames-fda-for-hemp-industry-troubles/>; (GenCanna: FDA's "uncertainty over how to regulate hemp...has diminished the interest of big companies in hemp food products and 'frozen' processors access to capital."); <https://www.forbes.com/sites/davidcarpenter/2020/03/18/hemp-company-files-for-bankruptcy-as-confounding-regulatory-guidelines-hamper-growth/#417b60955794> (Atalo: "The path to growth has been impeded by confounding guidance from regulatory agencies.")
- ¹⁶ <https://www.forbes.com/sites/mergermarket/2020/04/27/precipitous-decline-in-hemp-and-cannabis-ma-continuing-amid-covid-19-pandemic/#2d8825375c05>
- ¹⁷ <https://moblyft.com/blog/how-to-advertise-cbd-on-facebook-and-instagram/>
- ¹⁸ <https://www.classaction.org/media/fausett-et-al-v-koi-cbd-llc.pdf>; <https://www.classaction.org/media/dasilva-v-infinite-product-company-llc.pdf>
- ¹⁹ <https://www.courtlistener.com/docket/17027232/third-wave-farms-llc-v-pure-valley-solutions-llc/>
- ²⁰ <https://www.marijuanamoment.net/mitch-mcconnell-talks-cbd-regulations-with-fda-head/>
- ²¹ <https://www.kyagr.com/ky-agnews/press-releases/2020/Quarles-Urges-FDA-End-Bureaucratic-Paralysis-Hemp-Regulatory-Decisions.html>
- ²² <https://www.naturalproductsinsider.com/ingredients/fda-commissioner-deeply-focused-cbd-issues>
- ²³ <https://www.nutraingredients-usa.com/Article/2020/02/28/FDA-chief-Hahn-says-it-would-be-fool-s-game-to-try-to-shut-down-CBD-markets>
- ²⁴ [Acting FDA chief suggests no quick solution to CBD 'stalemate' \(naturalproductsinsider.com\)](https://www.naturalproductsinsider.com/Acting-FDA-chief-suggests-no-quick-solution-to-CBD-stalemate/)
- ²⁵ [FDA Head Admits Agency Has Been Slow To Regulate CBD, But Suggests Congress Needs To Do More - Marijuana Moment](https://www.marijuanamoment.net/fda-head-admits-agency-has-been-slow-to-regulate-cbd-but-suggests-congress-needs-to-do-more/)
- ²⁶ See e.g., <https://www.sciencedirect.com/science/article/pii/S2214750019305207>; <https://www.hindawi.com/journals/jt/2018/8143582/>; <https://pubmed.ncbi.nlm.nih.gov/32268347/>; <https://www.tandfonline.com/doi/abs/10.1080/19390211.2020.1767255>
- ²⁷ Kaufmann R, Aqua K, Lombardo J, Lee M (2021) *Observed impact of long-term consumption of oral cannabidiol on liver function in healthy adults*, Cannabis and Cannabinoid Research X:X, 1-7, DOI: 10.1089/can.2021.0114: [Observed Impact of Long-term Consumption of Oral Cannabidiol on Liver Function in Healthy Adults \(hempsupporter.com\)](https://www.hempsupporter.com/observed-impact-of-long-term-consumption-of-oral-cannabidiol-on-liver-function-in-healthy-adults) (The study "calls into question the claim that CBD can cause liver injury." Observational data gathered from 839 participants — ages 18-75 from across the U.S. and known to be taking hemp-derived CBD products orally

for a minimum of 30 days – showed that CBD at the doses consumed in the study is not associated with clinical liver toxicity.); Kauffmann R, Bozer A, Aqua K, Lombardo J (2022) *Observed Effects of Daily consumption of Hemp-derived CBD on liver function, testosterone, and daytime drowsiness*; [Abstract](#); [New Study Demonstrates CBD'S Strong Safety Profile, Amplifies Calls...](#) (hempsupporter.com).

²⁸ See e.g., self-GRAS affirmations from Charlotte's Web (<https://www.prnewswire.com/news-releases/charlottes-web-achieves-self-affirmed-gras-status-301025721.html>); CV Sciences (<https://ir.cvsciences.com/press-releases/detail/85/cv-sciences-inc-achieves-industrys-first-hemp-extract>); and Manitoba Harvest ([https://www.prnewswire.com/news-releases/manitoba-harvest-announces-broad-spectrum-hemp-extract-self-affirmed-gras-status-300858631.html#:~:text=MINNEAPOLIS%2C%20May%2031%2C%202019%20%2F,Recognized%20as%20Safe%20\(GRAS\)](https://www.prnewswire.com/news-releases/manitoba-harvest-announces-broad-spectrum-hemp-extract-self-affirmed-gras-status-300858631.html#:~:text=MINNEAPOLIS%2C%20May%2031%2C%202019%20%2F,Recognized%20as%20Safe%20(GRAS)))

²⁹ <https://hempsupporter.com/assets/uploads/2019.07.16-US-Hemp-Roundtable-FDA-Comments.pdf> (Industry study showed percentage of adverse effects reported between .01 and .1%)

³⁰ <https://www.who.int/medicines/access/controlled-substances/CannabidiolCriticalReview.pdf> <<https://www.who.int/medicines/access/controlled-substances/CannabidiolCriticalReview.pdf>>

³¹ <https://www.tga.gov.au/alert/review-safety-low-dose-cannabidiol>

³² <https://www.tga.gov.au/media-release/over-counter-access-low-dose-cannabidiol>

³³ <https://www.food.gov.uk/news-alerts/news/food-standards-agency-sets-deadline-for-the-cbd-industry-and-provides-safety-advice-to-consumers>;

³⁴ See e.g., [Bill Text - AB-45 Industrial hemp products. \(ca.gov\)](#); <https://regs.health.ny.gov/sites/default/files/proposed-regulations/20-21hemp.pdf>; [New Hemp Rules in Effect January 1 / 2020 Press Releases / Press Releases / News & Events / Home - Florida Department of Agriculture & Consumer Services \(fdacs.gov\)](#); [Texas Administrative Code \(state.tx.us\)](#)

³⁵ [Unregulated and Exploding: How the CBD Market Is Growing Amid a Labyrinth of State Approaches and Rampant Consumer Confusion - Consumer Brands Association](#)

³⁶ <https://jamanetwork.com/journals/jama/fullarticle/2661569>; (Only 30% of tested CBD products accurately labeled.); <https://www.marijuanamoment.net/fda-notifies-public-about-recall-of-cbd-product-that-tested-high-for-lead/> (Florida regulators prompt national recall of CBD product that tested high for lead.)

³⁷ https://hempsupporter.com/assets/uploads/CBD-Marketplace-Sampling_RTC_FY20_Final.pdf; See also, <https://www.fda.gov/news-events/speeches-fda-officials/remarks-lowell-schiller-jd-council-responsible-nutrition-conference-1172019-11072019> (FDA's Lowell Schiller: "Many of the manufacturers entering this space lack experience with FDA or DSEA, and we have serious concerns about issues like harmful contaminants such as pesticides, heavy metals, or other drugs like THC.")

³⁸ [5 Things to Know about Delta-8 Tetrahydrocannabinol - Delta-8 THC | FDA](#)

³⁹ [CBD: FDA Impact & the Path Forward \(brightfieldgroup.com\)](#)

⁴⁰ <https://hempsupporter.com/assets/uploads/cowen2020report.pdf>; See also <https://www.marketsandmarkets.com/Market-Reports/industrial-hemp-market-84188417.html> ("The industrial hemp market is projected to grow from USD 4.6 billion in 2019 to USD 26.6 billion by 2025...The food segment is projected to account for the largest market share in the industrial hemp market during the forecast period."); <https://bdsa.com/u-s-cbd-market-anticipated-to-reach-20-billion-in-sales-by-2024/> (US sales of "CBD products to surge from \$1.9 billion in 2018 to \$20 billion by 2024...majority of CBD product sales will soon occur in general retail stores.")

⁴¹ POLITICO Pro | Newsletter

⁴² <https://www.forbes.com/sites/janellelassalle/2019/09/11/why-cbg-cannabigerol-expensive-produce/#2881d972f771>

⁴³ <https://www.cannabisbusinesstimes.com/article/projections-us-leads-in-global-hemp-cultivation/>

⁴⁴ [How Much Does Epidiolex Cost? \(The Cost May Shock You\) - Nature by Science](#)

⁴⁵ [History and overview of DSEA - PubMed \(nih.gov\)](#)

⁴⁶ <https://ushempauthority.org/>

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MARKETING
PRIORITY PAYMENT
SYSTEMS
RADICLE SCIENCE
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