

U.S. Hemp Roundtable

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250 West Main Street, Suite 2800, Lexington, KY 40507

February 19, 2021

Senator Rosalyn Baker
Senator Stanley Chang
Hawaii State Senate
Hawaii State Capitol
Honolulu, HI 96813

RE: Roundtable Request for Amendments to S.B. 252

Senators Baker and Chang:

The U.S. Hemp Roundtable, the hemp industry's national advocacy organization, is very grateful for your efforts to promote the hemp industry within Hawaii and provide consumers with access to beneficial hemp products. We strongly support the underlying purpose of the bill -- that hemp-derived CBD should be authorized in all ingestible hemp products, to include dietary supplements and foods.

There are a few aspects of your bills where the Roundtable requests amendments, we welcome the opportunity to partner with you to address these areas. Simply put, we share your goal of providing high-quality, safe hemp products to consumers and remain available to you as we work collectively towards this goal. These include:

- **Clarification on the Status of Dietary Supplements**
 - Throughout the bill, "dietary supplements" should be added everywhere food, beverage, or cosmetic is mentioned to make clear that hemp may be used in food and dietary supplements.
- **Health-Related Labeling Statements**
 - The prohibition of health-related statement should be revised to only prohibit disease claims, similar to the following: "A manufacturer, distributor, or seller of an industrial hemp product shall not include on the label of the product, or publish or disseminate in advertising or marketing, any industrial hemp or industrial hemp products diagnosis, cure, mitigation, treatment, or prevention of any disease." Such language is in line with other states and would provide better clarity for hemp product manufacturers than the current version of the bill.
- **Pregnancy or Breastfeeding Warning**
 - The required warning against using CBD products while pregnant or breastfeeding should be removed because there is no scientific evidence that CBD is harmful to pregnant or breastfeeding women. Furthermore, no other state requires a similar statement on their labels, creating a burden on manufacturers to develop a label unique to Hawaii.

The Roundtable again thanks you for your support of the hemp industry and respectfully requests you amend your legislation as outlined above. Should you have any questions or wish to discuss any of these points, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Miller', with a long horizontal flourish extending to the right.

Jonathan Miller
General Counsel
U.S. Hemp Roundtable

2021 U.S. HEMP ROUNDTABLE

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