

U.S. Hemp Roundtable

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August 17, 2019

The Honorable Sharif Street
Pennsylvania State Senate
Senate Box 203003
Harrisburg, PA 17120-3003

Senator Street:

The U.S. Hemp Roundtable, the hemp industry's leading national business advocacy organization, involves more than 75 companies, representing every link of the hemp food chain, from seed to sale, as well as all of the industry's leading national grassroots organization. We appreciate the opportunity to comment on Senate Bill 335, your very worthy effort to expand Pennsylvania's hemp program.

We commend you and your colleagues for your outstanding work on developing the bill, which will advance the interests of Pennsylvania's hemp farmers and small businesses. We offer the following recommended adjustments:

- We recommend that you change references to "industrial hemp" throughout the bill to "hemp" and change its definition to align with the 2018 Farm Bill.
 - All parts of the plant, derivatives, cannabinoids, etc. are mentioned in the definition of "product" (and uses the term the industrial hemp).
 - If this change is acceptable, then "industrial hemp" would need to be changed to "hemp" throughout the bill.
- We recommend that you change the definition of "Product" to "A finished product containing industrial hemp which:"
 - (1) "Is a cosmetic, food, food additive, **or dietary supplement.**", ~~or herb.~~
 - Also remove (2) and move to definition of "hemp."
- Page 2, line 7 change to "Manufacturing of food **and dietary supplements.**"
- Page 2, line 8 change to "Each manufacturer of food **or dietary supplements...**"
- Starting on line 10:
 - "(1) Each part of the hemp plant utilized in the food product **or dietary supplement** must come from a state that has an established and approved industrial hemp program or a country that inspects or regulates hemp under food safety or equivalent criteria to ensure safety for human consumption."
- Line 26: "Clear identification that the product contains cannabidiol **if added as an isolate and the percentage of cannabidiol if added to the product.**"

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- This change aligns with FDA rules for declaring CBD content, i.e., it's optional unless using isolate. Under FDA rules you could list the percentage of CBD instead of milligrams in the Supplement Fact panel, but as written this makes it mandatory so better to remove and not specify how it should be identified on the product.
- Delete lines 29-30, as FDA rules already require a disclaimer for dietary supplements, and food products do not require such a disclaimer under FDA rules.

We would be pleased to discuss any of these suggestions at your convenience. Please don't hesitate to contact me.

Sincerely,

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