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Intoxicating Hemp Products

Policy Brief for California Local Government

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DISCLAIMER

This brief was produced for the County of Santa Clara Public Health Department. It represents the views of the authors and not necessarily of the County of Santa Clara.

In 2018 the United States (U.S.) Agriculture Improvement Act (Farm Bill) removed hemp — defined as any part of the plant *Cannabis sativa* L. that contains no more than 0.3% of the intoxicating ingredient Delta-9-tetrahydrocannabinol (D-9-THC) from the U.S. Controlled Substances Act. Additionally, in 2021, California’s Assembly Bill 45 (AB45) legalized the manufacture and sale of products intended for human consumption that contain ingredients derived from industrial hemp, including foods and beverages with intoxicating cannabinoids.

While the intent may have been to legalize hemp-derived cannabidiol (CBD), which is usually non-intoxicating, loopholes allow psychoactive hemp products to be sold. As a result, a wide range of poorly regulated intoxicating hemp products have proliferated throughout California and can be legally purchased by underage consumers at gas stations, smoke shops, convenience stores, and other retailers outside of the legal cannabis market. Accidental ingestions, adverse events, emergency room visits, and hospitalizations involving intoxicating hemp products have skyrocketed; many occur in very young children and adolescents. In this document, we review policy options for local government to address this urgent public health issue.

Legal options are also presented in the accompanying Model California Hemp Ordinance. Key recommendations include local enforcement of existing law, prohibiting the sale of intoxicating hemp products and all artificially derived cannabinoids, establishing age limits, limiting places of sale, and strengthening restrictions that prevent hemp products from being attractive to children.

THE POLICY PROBLEM*

While the 2018 U.S. Agriculture Improvement Act and California’s 2021 AB45 purported to not intentionally make psychoactive substances widely available, both laws were drafted with major loopholes that have led to large scale proliferation of a wide range of highly intoxicating hemp products. The sale of these intoxicating hemp products exposes consumers to acute hazards while undermining legal cannabis businesses that work to comply with requirements for licensure and operation.

In this brief, we review the differences between cannabis and hemp, including legal differences that have allowed intoxicating hemp products to proliferate. We then describe local authority and options for local action.

***Note to Readers:** The legal information in this brief does not constitute legal advice or legal representation. For legal advice, readers should consult an attorney in their state.

WHAT'S THE DIFFERENCE BETWEEN CANNABIS AND HEMP?

Both cannabis and hemp come from the same species of plant, but the term “hemp” is legally defined as *Cannabis sativa* L. and any part of that plant, including the seeds thereof and all derivatives, extracts, cannabinoids, isomers, acids, salts, and salts of isomers, with a Delta-9-THC (D-9-THC) concentration of not more than a 0.3% on a dry weight basis.¹ Cannabis contains more than 0.3% D-9-THC on a dry weight basis. Both cannabis and hemp contain over 100 cannabinoids, a group of naturally occurring, biologically active compounds that are unique to the *Cannabis sativa* L. plant, some of which are intoxicating. The two cannabinoids commonly associated with cannabis and hemp are:

- **Tetrahydrocannabinol (THC)**, the main intoxicating ingredient in cannabis. It exists in the plant mostly in a non-intoxicating form called tetrahydrocannabinolic acid (THCa), which converts to the intoxicating D-9-THC when exposed to heat (e.g., smoking, vaporizing, or cooking). THC is predominant in most cannabis.
- **Cannabidiol (CBD)**, which exists in the plant as cannabidiolic acid (CBDa); both forms are generally considered non-intoxicating.² CBD is usually predominant in hemp.

WHAT'S LEGAL & WHY IT MATTERS

Cannabis is still federally illegal in the U.S. and a Schedule I drug under the Controlled Substances Act (CSA), although over 40 U.S. states have legalized medical and/or non-medical cannabis use to varying extents.³ When the Agriculture Improvement Act of 2018 (“2018 Farm Bill”) removed hemp and its derivatives from the CSA nationally, the Drug Enforcement Agency (DEA) stopped regulating hemp as an illegal drug. Instead, the 2018 Farm Bill placed the regulation of hemp farming under the authority of the U.S. Department of Agriculture (USDA) and explicitly preserved the U.S. Food and Drug Administration’s (FDA) authority over hemp-derived products intended for human consumption.^{1,4}

Additionally, in California in fall 2021, the Governor signed Assembly Bill 45 (AB45), which removed prohibitions on the use of hemp ingredients that are not generally recognized as safe by the FDA for use in dietary supplements, foods, beverages, and pet food.⁵ While the public intent of AB45 was to allow non-psychoactive products containing cannabidiol (CBD) and other non-intoxicating hemp derivatives to be produced and sold in California, loopholes opened the door to a wide range of intoxicating products.

These products can be sold by almost any other business except licensed cannabis retailers, including supermarkets, smoke/vape shops, liquor stores, gas stations, online vendors, or other locations where underage consumers can legally access these products.⁶

The weight-based 0.3% limit on D-9-THC concentration does theoretically prevent hemp flower from being psychoactive when smoked, but it is inappropriate for edible hemp products because the weight of non-hemp ingredients can still allow for high doses of D-9-THC to be present. The Cannabis Regulators Association (CANNRA) has called for action on this critical loophole that allowed the proliferation of intoxicating hemp products. In California, AB45 also established a 0.3% D-9-THC concentration limit on any hemp-derived ingredient used in foods, beverages, and dietary supplements without limiting the absolute amount of THC a package can contain. As a result, in California, edible hemp products can legally contain more D-9-THC than edible cannabis products, which are limited to 10 mg THC per serving and 100 mg THC per package. Although AB45 gave the California Department of Public Health (CDPH) regulatory authority over industrial hemp in 2021, including the ability to establish age limits on sales or restrict intoxicating hemp products, as of this writing, they have only issued and enforced regulations related to the registration of hemp businesses. For this reason, many intoxicating hemp products that contain potentially hazardous compounds remain legal in California at this time and available for purchase by children.

Inhalable hemp products, such as vaping cartridges or pre-rolls, are legal to manufacture in California but only for export to other states; AB45 established that in-state sales of inhalable hemp products may only occur following the passage of a companion tax, which has not been proposed. Nonetheless, inhalable hemp products are widely available despite their current illegality.

According to the FDA, the only hemp-derived products considered to be generally recognized as safe (GRAS) for use in products intended for human consumption are hulled hemp seed (GRN765), hemp seed protein powder (GRN771), and hemp seed oil (GRN778). The FDA has made clear that non-GRAS hemp derivatives, including cannabinoids, are not approved for use in foods, cosmetics, or dietary supplements.⁴ In January 2023, after careful study, the FDA reiterated its position, even for non-intoxicating CBD, stating that “it is not apparent how CBD products could meet safety standards for dietary supplements or food additives.” They concluded, “The use of CBD raises various safety concerns, especially with long-term use. Studies have shown the potential for harm to the liver, interactions with certain medications, and possible harm to the male reproductive system.”

"CBD exposure is also concerning when it comes to certain vulnerable populations such as children and those who are pregnant."⁷

Because many U.S. states initially passed legislation like AB45 to allow the sale of non-GRAS hemp products intended for human consumption, new policies are needed and now being passed to restrict intoxicating hemp products that occupy a legal gray area, one in which they can be produced with minimal oversight, transported via interstate commerce, and be widely sold without legal age limits.

ARTIFICIALLY DERIVED CANNABINOIDS

Many businesses have taken advantage of the “Derivatives Loophole” caused by the Federal definition of hemp including, “all derivatives, extracts, cannabinoids, isomers, acids, salts, and salts of isomers” from the *Cannabis sativa* L. plant with a D-9-THC concentration of not more than a 0.3% on a dry weight basis. Businesses are taking hemp-derived CBD and using creative chemistry to convert it into a panoply of derivative cannabinoids that can cause intoxication. These are commonly referred to as artificially derived cannabinoids, which result from chemical synthesis. The most common among these is Delta-8-THC, which does exist naturally in minute amounts. Many of these novel, unevaluated, intoxicating cannabinoids are being infused and marketed in hemp products, including Delta-10-THC (THC-O), hexahydrocannabinol (HHC), and tetrahydrocannabiphorol (THC-P). THC-P is over 30 times the potency of traditional D-9-THC, making it particularly hazardous. Even more than hemp-derived products containing traditional Delta-9-THC, artificially derived cannabinoid products are often packaged in high doses, including packages containing hundreds or even thousands of milligrams. A single gummy may contain 100 mg or more of these artificially derived cannabinoids, easily capable of knocking out a child or adult.

Unlike D-9-THC, which has a large body of clinical research that dates back to the 1970s, the health effects of artificially derived cannabinoids are largely unknown.⁸ In response, the FDA and clinicians have raised concerns regarding the health risks of artificially derived cannabinoids, initially focused on Delta-8-THC, which was the first out of the gate.⁹ Los Angeles and Marin County Health Officers have issued advisories on the issue.^{10,11} Yet, these substances continue to be sold for human consumption across the state. CDPH has the authority to regulate these “hemp” products. In late June 2023, they took a clear position on their website communicating that these products, which they called "synthetic cannabinoid receptor agonists" (SCRA) are products of chemical synthesis and therefore illegal under AB 45. Additionally, there are also concerns about product quality: without adequate regulatory oversight, these products may be synthesized using harmful chemicals and manufactured in unsanitary conditions that can introduce contaminants.^{6,8}



Figure 1: Intoxicating Edible and Inhaled Hemp Products in a Santa Clara County Tobacco retailer containing up to 2,500 mg of artificial psychoactive cannabinoids Delta-8-THC, HHC, THC-P, Delta-10-THC, THC-H, and THC-B.



Figure 2: Intoxicating Hemp Edibles with Artificial Cannabinoids Derived from Hemp (left to right)

DOPE Sour Patch Kids gummies, 100 mg Delta-8-THC per gummy, 1,000 mg per pack; Delta Munchies watermelon flavored gummies with 30mg per gummy and 450 mg per pack; Shockwave sour candy belts with 4 artificial cannabinoids, including THC-P, with 500 mg per edible and 5,000 mg per pack.

HEMP PRODUCTS ATTRACTIVE TO CHILDREN

Intoxicating hemp products, including those with Delta-8-THC and other artificially derived cannabinoids, are frequently manufactured in ways that clearly appeal to children and teens; products imitating common snack foods like candies, chips, and beverages are extremely prevalent. Other than some poorly worded warning statements, the main preventative measure in AB45 was that hemp manufacturers shall not directly target advertising or marketing to children or to persons who are pregnant or breastfeeding. Consumers, including children and pregnant persons, may purchase or use hemp products without even knowing there are intoxicating substances in them.⁶

HOW HAVE INTOXICATING HEMP PRODUCTS IMPACTED PUBLIC HEALTH?

Widespread availability of intoxicating hemp products without adequate regulatory oversight has contributed to a rapid increase of clinical emergencies, many of which involve children and occur at schools. Examples of adverse medical outcomes include vomiting, anxiety, tremors, acute psychosis, respiratory depression, and loss of consciousness. Cases in young children may require intensive care or mechanical ventilation and, although rare, can cause death.

Broader availability of intoxicating products in the community in general can also contribute to increased rates of consumption, dependency, and adverse events. For example, “marijuana” vaping by 12th graders has tripled nationally from 4.9% to 14.8% since 2017, although we do not know how much is actually from hemp products.¹² Intoxicating cannabinoid consumption, whether from hemp or cannabis can cause significant mental health, driving, cognitive and other issues, although the effects of hemp derived products are less documented.

The number of adverse events involving intoxicating hemp products appears to be rising rapidly. In January 2021, the American Association of Poison Control Centers (AAPCC) introduced a product code for Delta-8-THC into the National Poison Data System (NPDS), and between January 2021 and February 2022, national poison control centers received 2,362 reports of exposures involving Delta-8-THC. Of those cases, approximately 58% involved adults and 41% involved pediatric patients (1% did not report age); additionally, 40% were due to accidental exposure, and 82% of these accidental exposures involved pediatric patients.^{6,13,14} As of January 2021, there has been at least one recorded pediatric death due to Delta-8-THC exposure.^{6,15}

Overall, recent studies have reported a drastic increase in cases of pediatric exposures to cannabinoids among children under 13 between 2017 and 2021, both in California¹⁶ and nationally,¹⁷ including a national 1,375% increase in accidental pediatric exposures to cannabinoids among children under age 6.¹⁸ These ingestions increasingly require intensive care. Unfortunately, many of these reports did not specify if the poisonings resulted from a legal cannabis product, illicit cannabis, or hemp; although some incidents reported to poison control centers specifically note exposures to hemp-derived products, the NPDS does not yet have a product code for intoxicating hemp products overall.¹⁹ Despite this looming public health threat, the state has yet to use its authority to prohibit intoxicating hemp products, other than sending warning letters to unregistered hemp businesses.^{20,21}

WHAT AUTHORITY DO CALIFORNIA CITIES AND COUNTIES HAVE TO TAKE ACTION?

The Public Health Institute (PHI), working with Los Angeles County, requested an analysis of local authority over hemp products from the Public Health Law Center (PHLC).²² Their key conclusions included the following:

Absent a clear intent to preempt local regulation, California localities enjoy broad home rule police powers under the California Constitution that they can use to promote the health, safety, and welfare of their communities. Because AB45 does not manifest a clear intent to preempt local regulation of industrial hemp, California localities likely have the authority to prohibit the sale of foods/supplements that have hemp-derived cannabinoids... Article XI, section 7 of the California Constitution gives counties and cities the power to “make and enforce within [their] limits all local, police, sanitary, and other ordinances and regulations not in conflict with general laws.”²³ When a locality exercises that authority, courts will typically find that exercise valid unless there is “a clear indication of preemptive intent from the Legislature, that such regulation is not preempted by state statute.”²⁴

PHLC noted that this issue has not been tested in the courts to date. Therefore, California localities can and should consider policy interventions designed to minimize the public health risks posed by intoxicating hemp products. PHI's cannabis policy research and technical assistance program, *Getting it Right from the Start*, has produced a model ordinance for California cities and counties to address intoxicating hemp products. PHI worked with Colantuono, Highsmith & Whatley, PC to develop the model.

STATUS QUO: NO ACTION

Unless CDPH or California localities develop and enforce stronger regulations, these products will continue to be available outside of the controlled cannabis market, including to children and youth. Inaction will only allow the adverse public health trends described above to continue to grow and may even undermine the legal cannabis market.

LOCAL GOVERNMENT CAN ENFORCE EXISTING LAW

Many hemp products currently being sold to consumers are illegal, including those produced by unregistered hemp businesses, all inhalable hemp products, and all products that contain artificially derived cannabinoids. Local government agencies can require documentation of hemp products and are encouraged to report problems as well as any related arrests to CDPH.** CDPH guidance for local agencies is available on their [website](#).

PROHIBIT SALE OF INTOXICATING HEMP COMPOUNDS ALTOGETHER OR OUTSIDE OF LICENSED CANNABIS RETAILERS

Local jurisdictions can likely prohibit the sale of intoxicating hemp compounds in general. They cannot authorize sale by licensed cannabis retailers under current state law, although that issue is under debate in the state legislature in 2023. **We recommend that local governments not allow the sale of intoxicating industrial hemp final products with more than 1 mg of traditional Delta-9-THC or any other intoxicating cannabinoids per package and 0.5 mg per dose.** In the future, local governments may need to decide whether to allow the sale of hemp products at cannabis retailers, but only if state law changes. Because state law may change, specifically prohibiting inhalable hemp products locally, especially intoxicating ones, is also recommended. We do not need another set of products that normalize and set youth on a path to start smoking.

PROHIBIT THE SALE OF ARTIFICIALLY DERIVED CANNABINOIDS

Although CDPH now considers these artificially derived cannabinoids illegal, they continue to be widely marketed. We recommend that local jurisdictions enact a prohibition on artificially derived cannabinoids, including those being chemically synthesized from other cannabinoids such as CBD, in order to effectively enforce the prohibition on these substances with unknown safety profiles being sold locally.

**CDPH identified Benson Yee (benson.yee@cdph.ca.gov), CDPH Food and Drug Branch Chief, as the contact for local government and public health officials.

A general ban on these compounds ensures that newly discovered intoxicating compounds are also covered, including those which are far more potent than D-9-THC. To date, several U.S. states, including Oregon²⁵ and Vermont,^{26, 27} have banned Delta-8-THC products; general restrictions on artificial cannabinoids should apply to both cannabis and hemp products because artificially derived cannabinoids are also beginning to appear in the regulated cannabis industry.

IMPLEMENT AGE RESTRICTIONS (AGE 21+) ON SALES OF INTOXICATING HEMP PRODUCTS

Local jurisdictions can require sales of hemp products that contain cannabinoids be restricted to age consumers that are 21 or older. As with tobacco, alcohol, and cannabis, local laws would need to require retailers to verify consumers' age.

IMPLEMENT RESTRICTIONS ON THE PLACE OF SALE FOR INDUSTRIAL HEMP PRODUCTS

Local jurisdictions can limit the types of commerce where any industrial hemp product can be sold, or where intoxicating hemp products can be sold. Note that the safety of use even of CBD, especially for children and in pregnancy is not clear, and the FDA has refused to allow it in foods or supplements as noted given evidence of certain toxicity. Limiting these products to places where children are less likely to enter, such as smoke shops not proximate to schools (especially if age-limited), and not allowing their sale in convenience stores, supermarkets, or other locales commonly frequented by children would be crucial.

PROHIBIT HEMP PRODUCTS, PACKAGING, OR MARKETING FROM BEING ATTRACTIVE TO CHILDREN

Local government can enact restrictions on the sale of hemp products with characteristics in the product, packaging, and marketing that are attractive to children and youth. As with cannabis products, we also recommend that any advertising for intoxicating hemp products be prohibited from media (including billboards) in which the audience is expected to be more than 15% children or youth.

CONCLUSION

A combination of the 2018 Farm Bill and AB45 has enabled the proliferation of poorly regulated intoxicating hemp products in California that can be legally sold to children. Cases of accidental exposure and adverse events will continue to rise in California and nationally unless preventative measures are implemented. Given the delay in state action to end the sale of intoxicating hemp products, we strongly recommend that California cities and counties implement their own policy interventions now, which appears not to be explicitly preempted by state law, in order to protect children and youth and to address the public health risks associated with these products.

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Authors

Lynn Silver, MD, MPH, FAAP

Nima Shahidinia, PhD, MPP, MPhil

Aurash Soroosh, RD, MSPH

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Contributors

Public Health Law Center

Design/Layout

Kiara Gonzalez Garcia

Getting it right from the Start, a project of the Public Health Institute

For more information or assistance, please to reach out to Dr. Lynn Silver.

CONTACT

Dr. Lynn Silver

lsilver@phi.org

917-974-7065

2000 Center Street, #380

Berkeley, CA 94704

www.gettingitrightfromthestart.org

[@GetItRightonMJ](https://twitter.com/GetItRightonMJ)