

I am writing on behalf of my family and our family business, Modern Remedies. Our family of six, is one of 24 hemp farms left here in Ohio, and like any other start up business we've endured many hardships. We've also faced many challenges unique to the cannabis industry. We've complied with strict regulations each year, and had many compliance hurdles and steep fees that came along with the hemp plant (It is after all a cannabis plant).

The bulk of the industry leads consumers to the psychoactive substances which floods our shelves in the dispensaries, on the black market, and in the thousands of vape shops across the state.

Most of those psychoactive substances are a result of efforts to bring this plant back to American farmers. Like anything, there are ways to work around doing things the hard way and the bad actors have found a short cut.

Delta 8 came about because 400,000 plus acres of hemp that was farmed so eagerly had no outlet or infrastructure. No access to markets. Farmers for 80 plus years have been commodity farming and essentially been told what they're going to get for their crops, when they're going to get it.

When all this beautiful hemp came to harvest, farmers didn't realize they were sold a dream without a market to sell it in. Further, they have had 80 years of atrophy on how to sell directly to consumers, because we've had to go to the grain co-op.

What happened with the 400,000 acres? It sat around until crafty chemists understood how to extract the tiny amounts of psychoactive substances and adulterate the Most abundant, non psychoactive, most beneficial cannabinoid in the plant, CBD by way of nasty solvents and acidic catalysts. Why? Because they didn't want to pay the steep penalties of medical licensing, or they saw a quick opportunity to go after psychoactive market... Either way, they took the best part of the plant as it relates to health and wellbeing of a consumer, and turned into a dirty way to get high.

I've been farming since I was little, but had the privilege of running another farm direct business (similar to Joel Salatin, a virtual mentor of mine. You may know him , because Trump is now talking about giving him a seat in the department of Agriculture).

Farmers need access for hemp/Cannabis. The public needs WAY more education on what this plan does and all the beneficial cannabinoids outside of THC.

We not only need to remain in all the stores such as Giant Eagles, Fitness centers, Pet Stores, and Pharmacies. But we need access to dispensaries, where people with knowledge of the plant can speak to entry level users, folks who don't even need to get high, but their doctor knows there are many benefits to the plant.

In order for farmers to survive and thrive in the Hemp/Cannabis Market, they only need more access, and prioritization to shelf space and consumers. The big box cannabis stores are only leading consumers to heavy THC products because they know in the long run they're the most addictive and profitable.

All below notes are suggestions on additions or clarity to OHSB326_110524 as suggested by Ohio Hemp Farmers.

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ORC 928 – Hemp & Hemp Products (Existing)

1.1. 928.01 – Add Definitions

1.1.1. Define “Hemp Tinctures”

1.1.2. Define “Hemp Edibles”

1.1.3. Define “Hemp Flower”

1.1.4. Define “Hemp Pre-Filled Vaporization Products”

1.1.5. Define “Hemp Pet Products”

2. Section 3779.01(B):

2.1. *Current language: "Intoxicating hemp product" means a hemp product containing more than five-tenths of a milligram of delta-9 tetrahydrocannabinol per serving, two milligrams of delta-9 tetrahydrocannabinol per package, or five-tenths of a milligram of total non-delta-9 tetrahydrocannabinol per package.*

2.2. This is likely a drafting error as the preamble to the new regulation indicates the maximum permissible THC concentration is 1 mg per serving and 5 mg per container and no more than 0.3% THC, this draft currently reads plainly: *maximum Total THC concentration is 1 mg per serving, or 0.5 mg per container, or 0.3% Total THC on a dry weight basis.*

2.3. Replace with: “... a hemp product containing more than 1 mg of Total THC per serving and 5 mg of Total THC per package or 0.3% THC on a dry weight basis.

2.4. Suggest to add: below this definition the following exclusions:

2.4.1.1. **Hemp Tinctures** to contain up to 100 mg of delta-9 THC by weight , recognizing that tinctures are often consumed gradually and are used by individuals seeking therapeutic benefits from low-THC cannabis without intoxicating effects. A 15-1 CBD-THC Cannabinoid ratio would be suggested. *(State of OR as example)*

2.4.1.2. **Hemp Edibles** - a hemp product cannot exceed: 1 mg of Total THC per serving and 5 mg of Total THC per package. Note: the new regulations, read plainly, state the maximum Total THC concentration is 1mg per serving, or 5mg per container, or .3% Total THC on a dry weight basis. This is likely a drafting error as the preamble to the new regulation indicates the maximum permissible THC concentration is 1mg per serving and 5mg per container and no more than 0.3% Total THC. *(See RI as example)*

2.4.1.3. **Hemp Flower** ≤ 0.3% Delta 9-THC concentration (See NY as example)

2.4.1.4. **Hemp Pre-filled vaporization pens:** ≤ 0.3% Delta 9-THC concentration, Ratio of CBD to THC ≥ 15:1 (if CBD is not the primary marketed cannabinoid, the sum of cannabinoids excluding THC must have a ratio ≥ 15:1 THC) (See NY as example)

2.4.1.5. **Hemp Pet Products:** Limitations do not apply to animal remedies for pets, specialty pets, and equines that include ingredients from industrial hemp (See IA as example)

3. **Add New Section (in accordance with numbering in bill) to:**

3.1. Add Definitions:

3.1.1. Ohio Adult-use dispensaries

3.1.2. Ohio Hemp Farmers

3.1.3. Department of Cannabis Control (DCC)

3.2. Appoint DCC to establish framework to outline hemp sales in adult-use dispensaries

3.2.1. Framework should establish:

3.2.1.1. Process to Permit Ohio Hemp Farmers to sell approved products into dispensaries

3.2.1.2. A mandate dispensaries shall carry minimum 10% of inventory sourced from Ohio Hemp Farmers that are Low THC products including Hemp Flower, Hemp Tinctures, Hemp Edibles, and Hemp Pre-Filled Vaporization Pens as previously defined

3.2.1.3. A reduced tax structure in-line with normal sales tax rates on all Ohio Hemp Farmer products sold in Ohio Adult-use dispensaries