



PRODUCTS CONTAINING CANNABIS OR CANNABIS-DERIVED COMPOUNDS

Presented by

Garrett O. Graff, Esq., Managing Attorney

TAKEAWAYS

1. Need for interim FDA guidance to encourage thoughtful and sensible regulations
2. Need for federal guidance to reconcile varying state laws/regulations and create baseline standard
3. Existing FDA standards – GMP regulations, labeling, warnings/disclaimers, testing and more – provide an existing framework to ensure safety and regulate hemp products
 1. No need to re-invent wheel – hemp is an agricultural commodity
4. Further research is needed to contribute to developing protective standards

MARKETING/LABELING/SALES

- FDA maintains existing product label regulations and standards applicable here
- Sufficient opportunity to inform consumers of associated risks
 - Use of existing and newly developed disclaimers, conventional warnings and directions for use
- Little need, identified to date, to specially regulate use by vulnerable human populations
- As with other industries, relies on manufacturers to comply and disseminate information to consumers
- Need for reconciliation amongst varying state laws and regulations as opposed to special hemp laws separate and apart from food regulations

MANUFACTURING AND PRODUCT QUALITY AND SAFETY

- Existing GMP regulations are workable – other agricultural commodities and products utilize solvents and are intended for ingestion/consumption
- Able to be enforced by state and local authorities consistent with other food additives/dietary ingredients
- Testing for potency, contaminants (heavy metals, pesticides, etc.) is currently available
 - Including from well-reputed testing companies with decades of experiences and pedigree in food additives
- **Terminology:** Full spectrum hemp [extract/oil]; Broad spectrum hemp [extract/oil]; [Cannabidiol or another cannabinoid] isolate, and Hempseed oil.

HEALTH AND SAFETY

- Hemp-derived cannabinoids such as CBD contain a “good safety profile;”
- *But*, federal laws have stifled sensible research into cannabis-derived compounds
- Need for federal guidance to encourage additional clinical and other research by universities and other conventional research resources
- Need to sensibly distinguish drug development from other existing, conventional and more accessible product types

CONTACT

Garrett O. Graff

Hoban Law Group

www.hoban.law

303-674-7000

garrett@hoban.law



H O B A N
L A W G R O U P

THE NATION'S PREMIER
CANNABUSINESS FIRM