

To: Mary Segawa (WSLCB)  
From: M. Bailey Hirschburg (WA NORML)  
Re: Cannabis consumer education materials and resources

## Notes/Additions to Cannabis Basics

### Definitions

- **THC/CBD** - Definitions, remove “CBD is mostly used for medicinal or health-related purposes.” THC has been shown to have antianemic, pain,<sup>1</sup> and anti-seizure properties<sup>2</sup>. The existing wording implies that the sole use for using THC is a “high.” If identifying the health and wellness use of CBD continues, a note that THC has effects beyond simply psychoactivity is warranted.
- **Other Cannabinoids** - Worth noting there are around one<sup>3</sup> to two hundred<sup>4</sup> other cannabinoids identified.
- **Sativa/Indica/Hybrid** - Previous crossbreeding of cannabis has resulted in almost no ‘pure’ sativa/indicas. Though some do exist, the phrasing gaining popular acceptance is indica/sativa ‘dominant’ cultivars.
  - I’ve never seen a source suggesting ‘high’ is more commonly used to mean ‘consumed a sativa strain,’ nor ‘stoned’ routinely used to mean ‘consumed an indica strain.’ Absent some survey results indicating super majorities of WA consumers use the terms in this way, suggest removing those descriptor words as it has the potential to mislead health and safety officials if they understand them to mean specific products.
  - While cannabis is neither classified as a stimulant, nor a depressant,<sup>5</sup> the indica/sativa distinction has been used to suggest which cultivars are more likely to have stimulating, or numbing impacts.
- **Hemp** - Should be mentioned how hemp has a wide array of uses, and perhaps link to the WSDA program page.

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<sup>1</sup> Ng T, Gupta V, Keshock MC. Tetrahydrocannabinol (THC) [Updated 2023 May 2]. In: StatPearls [Internet]. Treasure Island (FL): StatPearls Publishing; 2023 Jan-. Available from: <https://www.ncbi.nlm.nih.gov/books/NBK563174/>

<sup>2</sup> Perucca E. Cannabinoids in the Treatment of Epilepsy: Hard Evidence at Last? J Epilepsy Res. 2017 Dec 31;7(2):61-76. doi: 10.14581/jer.17012. PMID: 29344464; PMCID: PMC5767492.

<sup>3</sup> Rock EM, Parker LA. Constituents of Cannabis Sativa. Adv Exp Med Biol. 2021;1264:1-13. doi: 10.1007/978-3-030-57369-0\_1. PMID: 33332000.

<sup>4</sup> Govindarajan RK, Mishra AK, Cho K-H, Kim K-H, Yoon KM, Baek K-H. Biosynthesis of Phytocannabinoids and Structural Insights: A Review. Metabolites. 2023; 13(3):442. <https://doi.org/10.3390/metabo13030442>

<sup>5</sup> Wilson, Debra Rose. Is Weed a Depressant, Stimulant, or Hallucinogen? [Updated May 19, 2023] Healthline. <https://www.healthline.com/health/is-weed-a-depressant>

## Types of Products

**Inhaled** - Adding mention of kief and hash (hashish) calls attention to concentrates with little to no solvents, and lower cannabinoid concentrations (typically between 40-60% THC). In this way, they are less risky concentrates than dabs or wax (80-90+% THC), and by highlighting them consumers will be aware of, and may show more interest in them when considering purchasing concentrates. Could also point out the difference in possession limits on flower and concentrates, as well as limits on how much concentrates can be sold per package.

**Topicals** - Can be helpful to clarify the Cannabis Health and Beauty Aids (CHaBA) statute to indicate there may be products labeled as 'cannabis,' yet with little THC and available separate from licensed retailers. May refer down to 'hemp-derived' section where CHaBA citation was drafted.

## Reading a Product Label

Overall, this section would benefit from being adapted into a short informational video using a sample or example package and label for each product type for individuals who learn better through listening instead of reading.

**Total THC and other cannabinoids** - When averaging THC percentage for concentrates, it's OK (even preferable) to mention that they can be less than 60%, this is more accurate and may help reduce the odds a consumer prioritizes high THC content.

**Solvents** - Let people know that while solvents must be disclosed, labeling may note products that are solvent-less or solvent-free, helping them avoid these byproducts.

**Warnings** - Adults calling poison control if they consumed cannabis by mistake, but otherwise are not experiencing illness or distress strikes me as overzealous and a not great use of poison center resources. Reporting mistaken ingestion should be emphasized for minors.

## Understanding Test results

Please link to DOH medically compliant product resources when mentioned.

**Potency analysis** - Please update if revised definition of cannabis products includes other cannabinoids in the future.

**Pesticide screening** - Should make clear the number of pesticides for which testing is required, maybe link to WAC.

## Is it a legal product? How to know

Please confirm the list of retail licensees is reflective of tribal retailers, or highlight that stores on tribal property/claiming tribal status can be confirmed by the agency (or tribe).

## Hemp-derived and synthetic THC products – Legal?

I find the statement at the end of the first paragraph “The law also prohibits K2, Spice, and Bath Salts from being sold” to be confusing as it reads like those products weren’t banned until SB 5367. Would suggesting the sentence begins “Existing law already prohibited...”

Having heard that the majority of hemp consumable sales were occurring online,<sup>6</sup> could be worth highlighting that aspect when explaining availability of the products.

## Why buy legal

On third bullet, make folks aware regulations help ensure products are made in proper commercial or industrial facilities, thereby lowering risks of fire or environmental damage that had been more common in illicit markets.

Enough people shop with an eye towards bargains that you could argue that although cannabis products are highly taxed, competition among our large number of licensed producers and processors has kept pricing competitive with the illicit market.

Stores have consistent hours, clear prices, and often consistent variety of product types.

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<sup>6</sup> Radhakrishnan, K. CBD Potential Harms, Side Effects, and Unknowns, remarks on August 8, 2023.

[https://cannabis.observer/observations/pttc-nco-webinar-cbd-potential-harms-side-effects-and-unknowns-august-8-2023-summary/#takeaway\\_1](https://cannabis.observer/observations/pttc-nco-webinar-cbd-potential-harms-side-effects-and-unknowns-august-8-2023-summary/#takeaway_1)