



Testimony for S.54
Vermont Cannabis Trades Association (VCTA)
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Thank you for the opportunity to testify on S.54. Before we lay out our thoughts on S.54, we would like to provide you with some information regarding the impact of the law that passed on July 1st on our dispensaries.

Impact of July 1, 2018 Law on Medical Marijuana Dispensaries

The list below is a compilation of how the July 1, 2018 cannabis law adversely affected the Vermont Medical Dispensary Program.

1. Costs/Paperwork - Easy access to home grown product causes patients to delay and/or not renew their cards due to costs and paperwork required to join program. The 90-day waiting period associated with the required paperwork is an additional barrier.
2. Dried flower demand - Dried flower demand has abruptly decreased, adversely affecting our ability to project patient needs.
3. Significantly increased competition from the unregulated and illegal market. The unregulated and illegal market is now the largest competitor throughout the state - selling flowers, edibles, etc., and developing brands in preparation for a tax/regulate market. Black market delivery services are also prominent. There appears to be confusion among patients and home-growers as to the legality of transactions, therefore you can find a lot of product on the streets.
4. Confusion regarding legality of recreational market - There is a general assumption that the recreational market will open soon. Patients don't see the need to renew their card and potential patients don't see a need to go through application process.
5. Legal cultivation - Loyal cultivation customers realize they no longer need a card to cultivate legally. Prior to July 1, 2018, patients purchased seeds and clones from dispensaries; now they can get them from the illegal, unregulated market.
6. Lack of regulation around hemp processing/CBD product development - This is negatively impacting the Medical Marijuana Program. Most of the hemp that is being grown is actually cannabis. Vermonters now have access to 4:1, 5:1 8:1 CBD to THC products that they would have had to shop for through the Registry.
7. Needed changes to the Medical Program - In addition to the legalization of adult use, there was little to no change made to the Medical Program. Requirements such as need to renew yearly with a health care provider signature, 3-month health care provider relationship, 2-ounce limit, selection of one location to buy, etc. Patients question why they should bother with the strict rules of the Medical Program.

Comments on S.54

We appreciate the recognition of the importance of the Medical Marijuana Program in S.54. Despite the proposed expansion of adult use in Vermont, there are many advantages to the Medical Marijuana Program, which is why many of our patients want to continue to be served by us. One of the most important aspects of our programs is the relationships that we have developed over the past 6 years with our patients - they know they can trust us to talk with them one-on one about the products that would be most beneficial to their health and wellbeing. After the passage of S.54, the Medical Marijuana program will still have a lot to offer someone who has a medical condition – high quality products, knowledge, advice, and support.

The following comments reflect our thoughts on S.54 as the bill relates to Medical Marijuana:

Qualifying Medical Conditions – 7 V.S.A. § 951(8) – Page 35

Once adult use goes into effect, and anyone over 21 can purchase cannabis, there is no reason why a patient's medical provider should not be able to refer them to a Medical Marijuana Dispensary for a medical issue they determine, as the health care provider for this particular patient, will benefit their health care needs. **Therefore, we support the qualifying medical conditions language that includes another disease, condition, or treatment.**

Allowable Amount – 7 V.S.A. § 952(b)(1) and (2) – Page 37

Due to the severity of some patients' illnesses, we have patients that need dosages that are higher than the two ounces per month that is allowed under current law. **Therefore, we support increasing patients' allowable amount to 3 ounces.**

Priority of Licensees – 7 V.S.A. § 903(a)(2)

The medical dispensaries have 6 years of experience in the cultivation, testing and sales of cannabis in Vermont, **Therefore, we support the creation of a system of priorities for licensees, especially whether the applicants have an existing medical cannabis dispensary license in good standing;**

Cannabis Board

It is reasonable to have both Medical Marijuana and adult use under the Cannabis Board. **The Board should look at the existing Medical Marijuana Program rules and statutes for guidance in developing rules for the adult use market.**

Thank you for your consideration of our thoughts regarding S.54 and the Medical Marijuana Program.