

Madame Chair Pugh and House Human Services Committee members,

Thank you for allowing me to testify on H.548 on behalf of the 2,600 physician and physician assistant members of the Vermont Medical Society (VMS), the American Academy of Pediatrics Vermont Chapter (AAPVT) and the Vermont Academy of Family Physicians (VAFM) who urge you **NOT to remove the current statutory THC potency limit of 60% for concentrates.**

The Senate-passed version of H.548 removes the 60% THC potency cap *only on cannabis solid concentrates*, despite the [acute mental health and public health impacts that THC potency of up to 99% has had on users in states](#) where they have legal commercial cannabis markets with no THC limits (*The Senate-passed version also removes a prohibition on the sales of oil cannabis products separate from a battery devise, but these products never had a THC potency cap because they are currently prohibited*).

In yesterday's hearing there were several questions in which my attached testimony addresses. There were specific questions regarding what solid concentrates are and there seemed to be some confusion between a solid concentrate and an infused product that would be vaped with additives. [The National Institute of Drug Abuse](#) provides definitions of solid concentrates. **A concentrate is an extracted substance that has been isolated and reduced down to a high THC potency cannabis substance.** According to [cannabis retailers](#):

- An extract is a substance that's made by extracting a desirable compound from the raw material. That compound is then suspended in a solvent, most often alcohol or water.
- A concentrate is what is left when they remove the compound from the solvent. What remains is a more potent form of extract that doesn't contain any alcohol or water.
- Concentrates are a more solid substance that needs to be melted before it is inhaled. Concentrate vaping is the process of heating up the extract or concentrate inhaling the vapor.

**Therefore, the "additives" that Gillian Schauer, Ph.D, discussed are not in the concentrate itself at all, but rather could be what it is put into an infused product, like an edible or vape, (which is not what the bill addresses).**

The non-solvent-based concentrates, which tend to be under the 60% THC potency limit, are reported [by cannabis retailers](#) to be "the cleanest" products and chemical free: "*CO2 extraction, also less commonly known as supercritical fluid extraction, is solvent-free, mess-free, and very expensive. It's also very popular with pros because the product is completely without toxins (unlike, is the case with butane and propane), while retaining a terpenes-rich flavor.*"

Thank you for your consideration,  
Jill Sudhoff-Guerin  
Communication and Outreach Consultant  
Vermont Medical Society

Link to VDH webpage on Marijuana

<https://legislature.vermont.gov/Documents/2022/WorkGroups/House%20Government%20Operations/Bills/H.548/Witness%20Documents/H.548~Jill%20Sudhoff-Guerin~ADAP%20Data%20~2-15-2022.pdf>