

Dear Senator:

The Senate Economic Development Committee is considering amending Vermont law to allow high-potency cannabis to be sold at retail stores, and to remove the advertising ban.

This would depart from the present law, which limits sale of high-potency cannabis concentrates to medical dispensaries only. This change would be a major step backwards for Vermont, for two reasons.

First, although anecdotal stories exist from people who state they receive symptom relief, there is no convincing medical evidence supporting the use of high-potency cannabis (defined as greater than 10 to 15% THC) for any medical use. Studies of the medicinal benefits of cannabis use have involved cannabis with no more than 15% THC content. This is undoubtedly because the health risks of high-potency cannabis are well-known, and it would be unethical to conduct double-blind experiments on human beings by exposing them to high-potency cannabis.

In April of 2022, when testifying before the Senate Health and Welfare Committee against a cap, Cannabis Control Board Chair James Pepper reminded the Committee that the stated intent of the law is “consumer protection, public health and safety,” and he acknowledged that “these concentrates are dangerous... they are dangerous you know, there are long term negative health consequences of consuming high THC concentrates.” That remains true today and is especially true for fragile patients with serious chronic medical conditions who require maintenance on pharmaceuticals, which also puts them at risk for dangerous drug interactions.

Only a very small percentage of Vermont medical marijuana card holders (15%) chose to use high THC concentrates from the medical marijuana shops. Yet these Vermonters are on average 60-69 years old, frail, ill and likely on multiple meds, putting them at risk for dangerous drug interactions. Putting these risky high THC concentrates in Vermont’s recreational stores to serve such a small population of users presents risks of diversion or selling under the counter. <https://spaces.hightail.com/space/yksDdWpWk0>. In Massachusetts we have reports of marijuana shops’ CEOs urging employees to “up sell” high THC concentrates; in Vermont teens 18 years of age and over may obtain a “medical” marijuana card. High concentration THC addicts more quickly and this is especially true for youth.

Second, allowing sales of high-potency cannabis at retail stores will wreak havoc on the heightened public-safety protections currently applicable to dispensaries. With limited exceptions, no one can be allowed to enter a dispensary without a marijuana “medical” card. Medical dispensary staff must maintain careful records of all patients and their cards and safeguard the privacy of this data.

It is inconceivable that retail store staff will comply with these protections. Already now there is widespread violation of Vermont’s existing laws and rules governing those stores. For example, despite complaints to the Board about widespread violation, and the

resulting issuance of a warning by the Board to all licensees, it continues to be true that potential customers who enter a retail store rarely are handed a copy of the safety information flyer (point of sale flyer) that the statute mandates be given to every customer. In addition, lollipops and candies that are appealing to children are sold in recreational stores, even though the statute required the Board to issue rules prohibiting sales of any products designed to be attractive to children. (The THC child poisoning rate has risen by 1,375 percent). It seems unlikely that the heightened protections needed for dispensaries would be honored, or when they are not honored, that the Board will have the time and energy to effectively inspect and sanction violators.

As the parent of a child with mental illness, I can speak to the danger of high potency THC, specifically dabs. These products caused mania in my son. It was a terrible impact on a bright young mind and contributed to further substance use and eventual death from overdose.

As an Addiction Medicine Physician I am appalled by the constant lobbying from “Big Marijuana” to hide the risks these products have on our youth. They have no shame and are only interested in profit from our kids.

Kimberly D. Blake MD