

I am emailing on behalf of my father, Nick Warmerdam. We operate a cut flower farm near Vancouver BC. We would like our thoughts and concerns regarding the upcoming cannabis bill, specifically regarding the hemp extract regulations, to be passed on to the Social Affairs, Science and Technology Committee.

We feel that most of the proposed regulations are a great changes for this country. Some examples we enthusiastically support include:

- Allowing producers to take extracts out of whole plant hemp
- Allowing hemp extracts to be sold outside of the cannabis distribution system
- Testing all products

We have concerns with the industrial whole hemp extraction rules specifically with the limit of 10 micro grams of THC per gram of extract. This limit is several orders of magnitude lower than what is required for there to be any psychoactive effect. Reducing the THC content to this level will have a detrimental effect on the remaining cannabinoids within the extracted material. The entourage effect shows that the mixture of all compounds in the extract is more effective than isolating any single component. Therefore staying as close to a whole plant extract as possible allows Canadians to access as much benefit from this plant as possible. For hemp extracts containing cannabinoids, it may be more practical to limit the THC to a percentage of the total cannabinoids. We feel a THC content of 0.1%, 1% or 3% of total cannabinoids within the extract would be reasonable.

Alternatively, a higher THC limit (such as 0.1%, 0.3% - 1%) with respect to the total product weight could be considered. A percentage of 0.3% is the same standard that applies for a cannabis plant to qualify as hemp. This limit is important because if the THC limit is set lower than necessary for health reasons, it limits the effectiveness of the remaining cannabinoids in the extract.

We would also like to suggest that the currently limit of 0.3% of THC that is used to classify cannabis as a hemp plant limits the ability of farmers to produce a cost effective CBD extract. This low THC tolerance limits the available genetics that can grow successfully. At this time, Colorado is considering increasing their THC limit to 1% for cannabis to qualify as hemp. We think this is a more practical limit that does not pose safety and health threats to Canadians. While changing the limit of THC to classify hemp is important, the limit of THC in a whole plant extract is a much more important issue.

To our understanding, the THC content in extracts and the THC content that classifies hemp plants are not currently explicitly written in the legislation. It will however be part of the regulations that will follow. We are not sure if these changes could be made by an amendment to legislation or if it is an issue that the Governor in Council will need instruction on from the standing committee. We believe these issues are addressed in 139(1) a and 139(1) g in Bill C-45.

If you have any questions or would like to discuss further, we would be happy to do so.

Thanks  
Nick Warmerdam