

Dear Governor Inslee,

We, the undersigned, are writing this letter to express concern about delta-8 THC. Delta-8 THC is a psychoactive cannabinoid component of *Cannabis sativa*. Due to a loophole in regulations, this dangerous drug is currently allowed to be sold to Washingtonians, including children of any age. Washingtonians need your office to take immediate and decisive action to halt the sale of delta-8 products in Washington while safety regulations are absent.

When voters passed Initiative 502, only delta-9 THC was approved for adult use in Washington. A difference in one bond of the chemical makes delta-8 THC distinct from delta-9 THC, the main psychoactive component of marijuana. However, due to gray-areas in the 2018 Farm Bill, namely the fact that delta-8 can be extracted and synthesized from CBD in the hemp plant, delta-8 is being sold in Washington without the safety regulations or taxes imposed by I-502 despite its psychoactive and impairing properties. The lack of safety profiles on these products prompted the [Washington State Liquor and Cannabis Board \(LCB\) to ban the sale of](#) delta-8 products in I-502 licensed stores. However, **LCB's jurisdiction does not cover the sale of these products outside of cannabis licensees**. LCB is currently crafting legislation to bring all impairing THC-containing products (including delta-8) under their regulatory purview. But, even if the legislation passes, it will not go into effect until July 2022 at the earliest.

The CDC has issued a [Health Alert](#) about these products due to potential for adverse effects. Our concerns about the dangers of delta-8 are well founded. Here are some important facts about the drug:

- Adults, and especially children, are vulnerable to delta-8 intoxication, with symptoms including lowered heart rate, difficulty breathing, and coma.
- Delta-8 products are often insufficiently labeled, and consumers may not know the product substance is impairing.
- Poison centers have reported that people consuming delta-8 products think the product is “harmless” CBD rather than an intoxicating product.
- Young people are consuming delta-8 products with some needing hospitalization (e.g., [West Virginia Poison Center Substance Abuse #WV003](#)).

Because there is no required testing for content and safety on these products, 76% of products that were [tested also contained illegal levels of delta-9 THC](#). In fact, any amount of delta-8 in edible form is presently allowed for sale. Due to improper labeling, poisonings attributable to delta-8 products are likely underreported. Further, unlike delta-9 THC products, delta-8 edibles do not have testing, tracking, or production oversight, creating issues of sanitation and safety.

In the meantime, the dangers will persist. Minors in Washington can purchase impairing substances such as these [gummy bears](#) and [delta-8 vape products online](#). Our colleagues have documented delta-8 products for sale in convenience stores in Washington without an age restriction. [Newspapers in Washington are even promoting these products in sponsored content](#), claiming delta-8 can be part of a “safe and healthy lifestyle”. While these products are widely available to consumers of all ages in Washington, other states such as [Oregon, have banned the sale of delta-8 to minors](#).

Regulation creates guardrails, limits in potency, product forms that are allowable, and distance requirements from schools and other kid-friendly areas. The serious concern of these unregulated THC products and easy access to people of all ages has prompted the issuance of [additional health alerts to medical providers in Washington](#). However, these alerts do not prevent sale and ingestion. Therefore, to protect the health and safety of Washingtonians, especially Washington youth, we need a stopgap measure to halt the sale of delta-8 products in Washington while LCB legislation is pending.

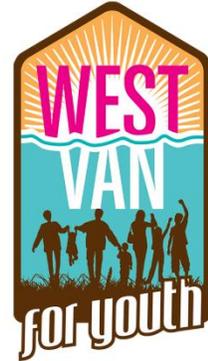
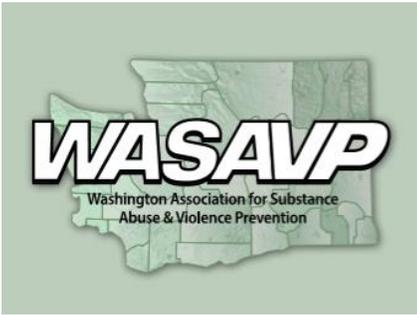
Thank you for prioritizing the health of Washingtonians,



Lisa Stewart, MSW, MJ, CPP

President | Washington Association for Substance Abuse and Violence Prevention (WASAVP)

(See page 2 for organizations signing with WASAVP)



West Spokane Wellness Partnership

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