



January 9, 2022

Amy Moore, Assistant Deputy Director/Counsel
Section for Medical Marijuana Regulation Missouri Department of Health and Senior Services
912 Wildwood PO Box 570
Jefferson City, Missouri 63102-0570

Re: Feedback to December 20, 2022 updated drafts of Industry Regulations

On behalf of the Missouri Hemp Trade Association, its members, associated businesses, and the Missouri hemp industry as a whole; we are writing to you regarding the proposed rules. We are specifically concerned with the amended language in the Draft Rule for Manufacturing Facilities: section (E).

(E) Any cannabinoid in a marijuana product manufactured by a manufacturing licensee shall only be derived from marijuana cultivated in Missouri by a licensed cultivator, and such marijuana products may not contain chemical modification, conversion, or synthetic derivation of cannabinol isomers, including delta-8, delta-9, and delta-10, or other cannabinol isomers.

The version of this provision in the November 10 Drafts focused on prohibiting “intoxicating tetrahydrocannabinol isomers.” This was plainly appeared designed to prohibit manufacturers from performing chemical conversions on substances extracted from federally legal hemp to yield intoxicating substances that could be infused into marijuana products. But the December 20 version removes references to “intoxicating” and inserts “cannabinoid” in place of “tetrahydrocannabinol.”

The result is a fundamentally different rule provision that threatens products both manufactured and sold in Missouri by legally produced hemp manufactures. The concern is this regulation may place Missouri Hemp producers, manufactures, retailers and/or customers in harmful situations, due to over zealous Law Enforcement. Law Enforcement may believe, since none of these Cannabinoids can exist in Marijuana Products, would that by default lead to Law Enforcement beliefs that all these Cannabinoids are illegal. This could cost our Industry a lot of unfair negative-bias and legal issues moving forward.



We would request that DHSS representatives help devise a safer alternative vs straight-out prohibition of legal Cannabinoids. We ask if DHSS has any information or data that shows safety concerns or damages caused by these types of products that would, by default injure either patients and/or customers that that data be shared with us. Any products manufactured containing such type Cannabinoids, we respectfully ask DHSS to assist Missouri Hemp Trade in developing safe, equitable testing or guidelines for any of the “Cannabinoids” DHSS would be concerned with. Missouri Hemp Trade Assn. feels in the time of decriminalization, and legalization, a positive action could lead to a better unified message for not only the Hemp Industry but for all Cannabis Industry. If any representative of DHSS would like to consult with the Missouri Hemp Trade Assn., please know Missouri Hemp Trade Assn. is always here to help and assist our Industry, and by default Cannabis customers and patients throughout the State of Missouri.

For these reasons we feel that the entirety of section (E) is superfluous and beyond the scope of the department's regulatory authority and should be entirely removed. Alternately we also would consider language that can benefit all of the cannabis industries involved.

Sincerely on behalf of,

Missouri Hemp Trade Association, Board of directors, Members, Hemp industry at large,

By: Sean Hackmann, President

By: Kevin Halderman, Board Member

