

Minnesota Society of Child and Adolescent Psychiatry

DATE: August 14, 2024
TO: Minnesota Office of Cannabis Management
FROM: Minnesota Society of Child and Adolescent Psychiatry
RE: Feedback on First Draft of Proposed Rules

The Minnesota Society of Child and Adolescent Psychiatry, a professional group of more than a hundred pediatric psychiatrists who practice in Minnesota, is concerned for our patients' safety, mental health, and substance use due to the rollout of commercialized cannabis. We recognize that the regulatory prowess attached to the Adult Use Cannabis Law is the responsibility of the Office of Cannabis Management. We would like to participate in the crafting of these regulations and submit some advice based on experience with our patients, the knowledge gained from scientific and clinical literature, and guidance from our national organization-the American Academy of Child and Adolescent Psychiatry.

Neurodevelopmental harm to youth awaiting completion of cognitive development at age 24 is our primary concern. The manifestation of this toxic impact is noted in an increase in psychosis, depression and anxiety, curtailed academic progress, and a higher risk of substance use disorders. All of these concerns are well documented in epidemiological and case review surveys here and across the globe. To reduce these risks, we have some specific requests for regulatory implementation. They follow well regarded and successful strategies based on public health principles. Overall, we see education and public health community messaging, oversight at the point of sale, and diminishing the availability of certain products that will migrate down to youth. We have studies that show the earlier the initiation of substances, the more regular the consumption, and use of high potency products are three main vectors in harm to teens. We would like you to know that the assumption that teens make is that if it is legal, it is not harmful to them. This perspective needs a specific action step by OCM and producers to be changed.

Here are suggestions that speak to youth safety and mental and substance use health.

Point of sale oversight:

Several states have found that a waiting room for an individual's verification of age and identification works best to prevent underage purchases. Retail stores should be required to have a separate waiting area.

Warning labels:

The larger group of consumers need to be informed that passing cannabis to youth has consequences to their mental and emotional wellbeing. To start a general notice such as: daily consumption of high potency cannabis (for leaf and concentrates) and (for topical and transdermal products) can be dangerous. Another general warning speaks to the dangers of secondhand smoke to all children.

More specific harm reduction notices must include statements that the use of cannabis can lead to:

- Harm to brain development
- Harm to the unborn fetus
- Increased risk for addiction
- Increased risk for mental health problems including Psychosis
- Increased risk for impaired driving
- Harmful Interactions with physician-prescribed medications that can have serious consequences
- Lower educational productivity and academic success

Potency limits:

When edibles were introduced some time ago, a tray of edibles was restricted to 50mg. The size and potency of products is a convenient reminder to the consumer that with all addictive substances, their controlled use diminishes harm.

To achieve this, we recommend creating a coding system that visibly informs the consumer about the potency of the product. Products under 10% might be coded green. This level has been shown to have much less impact on mental health than higher doses. Every retailer must offer this level of product so that the consumer is not forced to buy a dose higher than would be good for them. Yellow color packaging may denote products of intermediate potency such as 10 to 30% of THC. Finally, doses above 30% should have an easily visible internationally agreed to color such as red.

Our group was immediately struck by some dosage levels that would clearly be a hazard. The proposed limit of 70% potency for THC concentrates is dangerously high. We know of no other state that allows that extremely high dose. There is no evidence that 70% is a more effective product for the application to skin surfaces than a lower dose. Direct application to the skin for those unable or preferring not to smoke for recreational purposes can be achieved at a potency of 30% THC. We know that lower doses and less regular use is effective in avoiding the multiple harms of cannabis. Also, the misuse of concentrates by vaping which is rampant in teens needs to be recognized. 70% brings with it all of the concerns that the literature advises should be managed; therefore, a safer ceiling is 30% THC concentration.

We are encouraged that OCM is providing a portal for community input and that the process of devising regulations is transparent, honest, fair and goes beyond succumbing to the wishes of the cannabis industry.

We look forward to further dialogue with OCM and offer our Executive Director, Linda Vukelich, at 651-278-4241 for convenient contact.

Sincerely,

A handwritten signature in blue ink, appearing to read "Israel Sokeye", with a long horizontal flourish extending to the right.

Israel Sokeye, MD
President of the Minnesota Society of Child and Adolescent Psychiatry