



AHPA'S CANNABIS COMMITTEE CELEBRATES 10 YEARS OF INDUSTRY LEADERSHIP

Committee Milestones (2010-2020)

Since 2010, the American Herbal Products Association (AHPA) Cannabis Committee¹ has been addressing issues related to the safe use and responsible commerce of legally-marketed products derived from *Cannabis* species, including the state legal marijuana markets and products derived from hemp. Following are some of the key milestones that represent AHPA's involvement in supporting actions to create regulatory pathways for companies to legally engage in the cultivation, manufacturing, marketing and selling of products containing *Cannabis* species and collaborations with industry partners.

2010

- ✦ AHPA Board of Trustees approves formation of the AHPA Cannabis Committee and appoints Elan Sudberg (Alkemist Laboratories) as its first Chair.
- ✦ AHPA confirms formation of the AHPA Cannabis Committee will not diminish important Congressional legislative relationships, such as Sen. Orrin Hatch, critical to support of the dietary supplement industry.
- ✦ AHPA Cannabis Committee meets for the first time via conference call; Committee charter is drafted.
- ✦ AHPA Board of Trustees approves Cannabis Committee charter and Committee recommendation to support Federal legislation to legalize the cultivation of industrial hemp (Industrial Hemp Farming Act to be introduced in the 112th Congress).
- ✦ AHPA Board of Trustees authorizes communication with Drug Enforcement Administration (DEA) regarding issues related to laboratory analysis of state legal marijuana products.

2011

- ✦ AHPA requests DEA clarify the issue of the likelihood of enforcement against analytical laboratories doing work to analyze state legal marijuana.
- ✦ AHPA Cannabis Committee meets for the first time in-person during the Natural Products Expo West trade show.
- ✦ DEA responds to AHPA reiterating the agency's position on all matters related to marijuana but does not directly address the issue raised by AHPA's inquiry.

¹ Visit the Cannabis Committee webpage at <http://www.ahpa.org/AboutUs/Committees/CannabisCommittee.aspx>.

2012

- ✦ Cannabis Committee commits to developing best practice recommendations for state and local regulators in jurisdictions where cannabis has been legalized in four areas – cultivation, laboratory, manufacturing, and distribution.
- ✦ AHPA Executive Committee approves the first version of the Recommendations for Regulators – Distribution.

2013

- ✦ AHPA Board of Trustees endorses the passage of the Industrial Hemp Farming Act of 2013 at the recommendation of the Cannabis Committee.
- ✦ AHPA Board of Trustees approves the first version of the Recommendations for Regulators – Laboratory practices.
- ✦ Tim Smale (Remedy Compassion Center) appointed as the second Chair of the AHPA Cannabis Committee.
- ✦ AHPA Board of Trustees approves the first version of the Recommendations for Regulators – Cultivation and processing operations.

2014

- ✦ 2014 Farm Bill is signed by President Obama; the Farm Bill includes industrial hemp provisions which allow states to administer pilot programs for legal cultivation of hemp.
- ✦ AHPA Board of Trustees approves the first version of the Recommendations for Regulators – Manufacturing, packaging, labeling, and holding operations.
- ✦ Americans for Safe Access (ASA) launches its Patient Focused Certification program, using the AHPA Recommendations for Regulators documents as part of the foundation of its audit program.
- ✦ Cannabis Committee adopts a policy regarding the labeling of *Cannabis* spp. products to include the part(s) of the plant used in the product.

2015

- ✦ FDA issues warning letters to numerous cannabidiol (CBD) product marketers; Cannabis Committee discusses implications and determines strategy to support consumer access to CBD.
- ✦ AHPA Executive Committee approves AHPA Guidance on California Proposition 65 and Marijuana smoke.²
- ✦ FDA issues its public position on the use of CBD in dietary supplements; AHPA requests definitive date of the approval of CBD drug development and initiates discussions on potential for FDA to utilize its authority to create an exception to DSHEA section (ff)(3)(B)(ii).

² This guidance document can be accessed at <http://www.ahpa.org/Resources/Regulations/State.aspx>.

2016

- ✦ Updated versions of the four AHPA Recommendations for Regulators documents are issued.³
- ✦ At the recommendation of the Cannabis Committee, the AHPA Board of Trustees endorses the Compassionate Access, Research Expansion, and Respect States Act [CARERS Act (H.R. 1538, S. 683)], with the exception of the provision to reschedule marijuana from Schedule I to Schedule II of the Controlled Substances Act. The Committee instead recommends support for alternative options for the scheduling of marijuana, such as that presented in the Ending Federal Marijuana Prohibition Act (S. 2237).
- ✦ 5th annual AHPA Botanical Congress features a Cannabis session for the first time.
- ✦ AOAC International initiates its first committee focused on cannabis analytical standards.

2017

- ✦ AHPA completes Memorandum of Understanding (MOU) with ASTM International regarding use of content from the Recommendations for Regulators documents in ASTM's consensus standards development work on cannabis.
- ✦ AHPA staff participate in numerous subcommittees of ASTM International's newly formed D37 Cannabis Committee.
- ✦ United States Pharmacopeia (USP) launches its Medical Cannabis Expert Panel; AHPA staff and Cannabis Committee members engage in this work.
- ✦ AHPA staff are invited to speak at numerous national cannabis events, particularly on how regulation of the herbal products industry is relevant to cannabis.

2018

- ✦ AHPA publicly calls on FDA to exercise its statutory authority to consider issuing a regulation finding CBD to be a lawful dietary ingredient during the annual Dietary Supplement Regulatory Summit.
- ✦ 7th annual AHPA Botanical Congress features a full day Cannabis breakout session.
- ✦ AHPA issues first version of hemp status report providing guidance on the anticipated impacts of the 2018 Farm Bill.
- ✦ AHPA conducts webinar on impacts of the Farm Bill on the hemp industry.
- ✦ 2018 Farm Bill signed into law by President Trump; hemp production provisions effectively legalize the cultivation of hemp in the U.S.
- ✦ FDA issues statement regarding the 2018 Farm Bill, acknowledging the Agency's ability to issue regulation for CBD as a dietary supplement.

³ The current versions of these documents can be downloaded from the Cannabis Committee webpage at <http://www.ahpa.org/AboutUs/Committees/CannabisCommittee.aspx>.

2019

- ✦ AHPA establishes MOU with other hemp industry advocacy organizations to work cooperatively on issues of mutual interest.
- ✦ AHPA Executive Committee adopts Cannabis Committee's guidance policy on regulatory compliance recommendations for dietary supplements and food containing hemp or hemp-derived CBD.
- ✦ AHPA Cannabis Committee provides recommendations to the US Hemp Authority regarding the Authority's Guidance Procedures 2.0.
- ✦ AHPA provides oral comments at FDA's public meeting on "Scientific data and information about products containing cannabis or cannabis-derived compounds."
- ✦ AHPA submits written public comments to FDA's docket for "Scientific data and information about products containing cannabis or cannabis-derived compounds."
- ✦ AHPA publishes guidance on hemp products and California Proposition 65.⁴
- ✦ AHPA conducts its first annual Hemp-CBD Supplement Congress in Denver, CO for approximately 250 attendees.
- ✦ Asa Waldstein (Advanced Extraction LLC) is appointed as the third Chair of the Cannabis Committee.
- ✦ USDA issues Interim Final Rule (IFR) for Establishment of a Domestic Hemp Production Program; AHPA Cannabis Committee has a series of meetings to develop public comments.
- ✦ AHPA submits public comments to the USDA IFR on domestic hemp production.

2020

- ✦ AHPA recognizes the 10-year anniversary of the AHPA Cannabis Committee, thanking its Board of Trustees, the Committee and Member companies for ongoing leadership in this area.
- ✦ AHPA's second annual Hemp-CBD Supplement Congress scheduled to take place April 14-15, 2020, in Portland, OR.⁵

⁴ This guidance document can be accessed at <http://www.ahpa.org/Resources/Regulations/State.aspx>.

⁵ Agenda and registration information available at <http://www.ahpa.org/News/LatestNews/TabId/96/ArtMID/1179/ArticleID/1247/AHPA-Hemp-CBD-Supplement-Congress.aspx>.