

**Written Testimony on Behalf of Organic Remedies, Inc.  
Before the Pennsylvania State Senate Law & Justice Committee  
Public Hearing on Intoxicating Hemp Products  
June 24, 2025**

Dear Chairman Laughlin, Chairman Fontana, and Honorable Members of the Committee,

Thank you for the opportunity to submit testimony regarding the growing public health and regulatory concerns associated with intoxicating hemp-derived products in the Commonwealth. We commend the Committee for its willingness to examine this issue and consider its implications for Pennsylvania's medical marijuana program.

Organic Remedies, Inc. is a proud clinical registrant in the Commonwealth, licensed under the Department of Health. We operate both a grower/processor facility and a network of medical marijuana dispensaries. In addition, we maintain a formal research partnership with the Philadelphia College of Osteopathic Medicine, through which we conduct clinical studies to evaluate the efficacy and therapeutic potential of medical cannabis. Our operations are built on a foundation of science, transparency, and regulatory compliance.

Since the passage of Act 16 in 2016, Pennsylvania has developed a nationally respected medical marijuana program grounded in patient safety, medical rigor, and responsible access. Products dispensed through this program are subject to comprehensive testing requirements, clear labeling standards, and strict supply chain oversight. This framework exists to protect vulnerable patients—many of whom are managing chronic conditions such as cancer, epilepsy, PTSD, and multiple sclerosis.

Unfortunately, the rapid and largely unregulated emergence of intoxicating hemp-derived products poses a serious and immediate threat to this system of care.

The 2018 Federal Farm Bill, while intended to create an agricultural market for industrial hemp, inadvertently legalized cannabinoids that can be synthesized or converted from hemp—so long as they fall under the threshold of 0.3% delta-9 THC by dry weight. This loophole has led to vape shops and gas stations selling THCa flower which is marijuana. In addition, this loophole has led to a surge in products containing psychoactive compounds such as delta-8 THC, delta-10 THC, THCP, and HHC, many of which rival or exceed the intoxicating effects of regulated marijuana products.

Worse still, many of the hemp products now sold across Pennsylvania—including in convenience stores, gas stations, and online—either misstate or exceed the allowable delta-9 THC limits. These products are often produced using chemically synthesized processes, with little to no transparency about manufacturing inputs, residual solvents, or the presence of contaminants such as heavy metals or pesticides. The lack of consistent third-party testing or labeling puts public safety—and especially youth—at risk.

We respectfully highlight the following areas of concern:

- **Youth Access:** Intoxicating hemp products are frequently sold without age restrictions in retail environments that would never be authorized to dispense controlled substances or regulated cannabis. These products are often packaged in colorful, misleading ways that mimic snacks or candy.
- **Public Health Risk:** Without regulatory standards, consumers have no assurance that hemp-derived products are safe for inhalation or ingestion. The potential for toxic residual chemicals and inconsistent dosing presents a serious threat to health and safety.
- **Regulatory Disparity:** Licensed medical marijuana operators must comply with extensive regulatory, financial, and operational requirements—including seed-to-sale tracking, clinical documentation, taxation, and mandatory third-party testing. Meanwhile, intoxicating hemp operators face virtually none of these obligations.
- **Erosion of Patient Trust:** Medical marijuana patients and providers who rely on Pennsylvania's program for safe, regulated care are now confronted with unregulated alternatives that offer none of the same guarantees—and which are undermining confidence in the system.

Let us be clear: we are not opposed to hemp, nor are we opposed to cannabinoid innovation or research. Hemp-derived cannabinoids may offer legitimate therapeutic promise—but only if developed, tested, and distributed responsibly within a sound regulatory framework.

To that end, we respectfully urge the Senate, to act swiftly to address the current loopholes in state law. The following actions are essential:

1. Clarify the legal status of synthetically derived and chemically modified cannabinoids such as delta-8 THC, delta-10 THC, and THCP, and explicitly prohibit their sale outside of regulated cannabis channels.
2. Establish a Regulatory Framework for all intoxicating cannabinoids—hemp-derived or otherwise—that includes required third-party testing, standardized labeling, and limits on manufacturing processes and contaminants.
3. Impose Age Restrictions and Retail Controls by prohibiting sales in unlicensed retail environments and ensuring intoxicating cannabinoids are treated consistently with other controlled substances in terms of access and enforcement.
4. Support Education and Enforcement Efforts to help consumers understand the risks of unregulated cannabinoid products and provide state agencies with the tools and resources to enforce these standards effectively.

In closing, we thank the Committee for convening this important hearing and for your continued leadership in preserving the integrity of Pennsylvania's medical marijuana program. We welcome any opportunity to collaborate on sound policy solutions that protect patients, promote public health, and ensure a level playing field for responsible operators.