



February 22nd, 2021

To:  
Kathy Hoffman  
Legal and Policy Manager  
Washington State Liquor and Cannabis Board

From:  
Vicki Christophersen  
Executive Director  
Washington CannaBusiness Association

The Washington CannaBusiness Association (WACA) represents Washington's licensed and regulated cannabis and hemp businesses. As the most established trade association for cannabis and hemp businesses in the state we are committed to establishing a safe, quality-controlled, well-regulated system that keeps cannabis out of the hands of children. We value our collaborative relationship with the WSLCB and appreciate the opportunity to work together and to provide feedback on the draft policy statement regarding delta-8 THC.

We have shared the draft policy statement with our members and based on the feedback we have received we would like to make the following suggestion. Just like with CBD only products, prohibiting anything from the regulated system strengthens the illicit market to the detriment of regulated cannabis systems, for example what we saw with CBD-only products. The focus should be on incorporating all things cannabis into the regulated system in a safe manner, this includes delta-8 THC.

Delta-8 THC products are most sought out by those using medical cannabis therapeutically. Delta-8 THC possesses properties for medical patients that are different from, and in many ways superior to, delta-9 THC and CBD. We share the concern of the WSLCB regarding truly synthetic versions of delta-8 THC that are created in a lab, similar to k2 or spice. However, the current language in the policy statement would prohibit delta-8 THC that is created through natural processes.

We recommend a more clear definition for synthetic delta-8 THC that would clearly distinguish between truly synthetic delta-8 and delta-8 that is derived from cannabis or created through a natural process.

As always, we appreciate the opportunity to work with you and share input on the draft policy statement and we look forward to ongoing collaboration.

Sincerely,  
Vicki Christophersen