

LEGAL CANNABIS FOR CONSUMER SAFETY



November 18, 2019

Contra Costa Board of Supervisors
 651 Pine Street
 10th Floor
 Martinez, CA 94553

Dear Contra Costa County Supervisors:

We are **Legal Cannabis for Consumer Safety (LCCS)**, a coalition representing California's largest licensed cannabis growers, manufacturers, associations, retailers, testing labs, advocates, and marketplaces. LCCS is the regulated cannabis industry's unified voice on



consumer safety issues, and is committed to understanding the causes of lung illnesses associated with vaping and implementing fact-based responses.

In light of the Board's current review of vaping-related policy, **we respectfully urge you to reconsider the inclusion of legal cannabis in Ordinance No. 2019-34 prohibiting the sale of electronic smoking devices and e-liquids.** A ban on legal, regulated cannabis vapes will limit access to safe, tested products and put consumers at an even greater risk.

As of November 13, 2019, 42 individuals have died and over 2,172 people across the United States have been sickened by tainted e-cigarette and vaping products. The most recent findings from the Centers for Disease and Control and Prevention provide direct evidence of vitamin E acetate in the lung fluid samples collected from 29 patients — an additive commonly used as a thickening agent in unlicensed market products.

These illnesses are the result of the illicit market. The Centers for Disease and Control and Prevention has confirmed that most cases are linked to products obtained from unlicensed, illicit market sources. These tainted products include dangerous additives used as cutting agents, diluents or thickeners. CannaSafe, a licensed testing facility in California, [tested more than 100 unlicensed market cannabis goods](#) and found high levels of pesticides in all of them, including vitamin E acetate in the vast majority of samples. *None* of the 100 products from licensed brands also tested contained the above. Legal, licensed cannabis businesses have consistently complied with state laws around cannabis cultivation, manufacturing, testing, transportation and dispensing, highlighting the safeguards of a regulated cannabis industry.

Local bans on legal cannabis products will put consumers at greater risk. Banning legal, tested, compliant products is not the answer to vaping-related illness. A blanket ban on products containing tetrahydrocannabinol (THC) is an inadequate policy to curb an important public health issue. Such bans on THC vapes will only drive consumers to the unregulated, underground market, where they are at significantly greater risk. The data speaks for itself — there are higher rates of vaping illnesses in municipalities and states where consumers do not have access to safe, legal, tested cannabis vape products. This is evidenced in Colorado where, according to the CDC, youth are vaping nicotine at twice the national average. In light of their accessible regulated cannabis market, they've seen fewer than ten cases of vape-related illness and no fatalities. This is in sharp contrast to Utah next door, where they have the highest per capita vaping rate. Cannabis is not recreationally legal there, and they've experienced more than 100 cases of lung illness and one death. A ban in Contra Costa County will be no different, and will certainly put consumers at a heightened risk.

The State is working on a comprehensive policy to protect consumer safety, as a result of the Governor's Executive Order issued on September 16, 2019. California State lawmakers and public health officials are developing state-wide vaping policy to safeguard public health while supporting a responsible, regulated cannabis industry.

Over 30 million legal, licensed cannabis vaporizer cartridges have been sold in California since January 2018, providing a wealth of information on consumer use. As the stewards of this

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supply chain, we are eager to engage in efforts to further heighten the safety of cannabis vaping and mitigate the risks posed by the illicit market.

We urge you to amend Ordinance No. 2019-34 to not ban the sale of cannabis vape products and work in partnership with the State on data-driven policy solutions to address EVALI. You can contact us at info@calccs.org.

Sincerely,
Legal Cannabis for Consumer Safety
info@calccs.org

Anthony Law Group
Dosist
Legion of Bloom
sclabs
Artemis Growth Partners
Eaze
Level
Se7enLeaf
Austin Legal Group
Eden
LoudPack
Select
AVD
Farmacy Santa Barbara
Lowell Herb Co.
Sherbinskis
Bloom Farms
Field
Mammoth Distribution
Skunk Feather Cannabis
BPG
Flow Kana
Mario Antonio
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Flower Co
Meadow
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