

THE OREGON INFUSED TOPICAL ASSOCIATION

White Paper

Helping people and growing jobs.

Authors

Ellyn Ford, MS-MBA
Jean Wilson

Oregon Infused Topical
Association
Portland, Oregon

We propose exempting all cannabis-sativa infused topical health and beauty aids and personal care products that contain less than 1% THC from the regulations being established for distribution of marijuana under Measure 91. Increasing availability of these products through traditional non-cannabis distribution channels, such as alternative medical clinics, boutiques and grocery stores will benefit both Oregon consumers and boost cottage-industries providing additional employment opportunities and economic development throughout the state.

Research shows that the chemical compounds in cannabis (THC & CBD) are necessary for healthy skin, leading to new treatments for skin diseases.

These treatments can efficiently be applied locally to the skin in the form of a cream.¹⁷

The Oregon Infused Topical Association

The Oregon Infused Topical Association is composed of producers of cannabis-infused lotions, oils, salves, balms, beauty and related products currently for the Oregon medical marijuana market and soon the recreational market.

Members include men and women who have been supplying a range of cannabis-infused health and beauty products to the state's dispensaries for the last three to four years, as well as new start-up businesses.

As we all prepare for implementation of Measure 91, the OITA is opening a dialogue about whether cannabis-infused topicals with less than 1% THC should even be included with the high-THC content products such as concentrates and edibles being sold.

Personal care products containing hemp are widely available in supermarkets, lotion boutiques, spas, salons, and chain drugstores. Hemp and marijuana come from the same plant: *Cannabis sativa*. Industrial hemp contains about 0.3% to 1.5% THC.¹ While industrial hemp has more CBD than THC, the overall cannabinoid content in industrial hemp is very low—far less than in medical cannabis—so it is not nearly as effective as our cannabis-infused topical products, even those with 1% or less THC, making it an unsuitable alternative to our products.

OITA proposes exempting all cannabis-sativa infused topical products containing less than 1% THC from the wholesale & retail regulations affecting marijuana sales under Measure 91.

¹ "Difference between industrial hemp and cannabis," hempethics.weebly.com/industrial-hemp-vs-cannabis.html; accessed February 14, 2015.

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ABOUT THIS WHITE PAPER

For 5,000 years humankind has used the cannabis plant for healing and as a beauty aid. American physicians up until the mid-1930s prescribed it for a myriad of conditions until the federal government began imposing increasingly restrictive policies that culminated in 1970 with Congress classifying cannabis as a Schedule 1 substance, denying its medical efficacy despite its long global history as a healing herb. However, cannabis never lost its cachet for practitioners of alternative medicine, going mainstream in 1995 when California became the first of the now 23 US states that have medical marijuana laws, and four have legalized marijuana for recreational use with more expected to follow this trend.²

As legalization in one form or another and public acceptance grows, so too does market demand for cannabis products. The stories of demand far outstripping supply have become legion in both Colorado and Washington State. With that increased market demand comes innovation to deliver products in a myriad of new forms to consumers. While the most common way to utilize marijuana remains smoking, that is changing rapidly as new delivery systems come into the marketplace.

Among the newly introduced products are Cannabis-Infused Topical preparations consisting of lotions, salves, balms, and other typical personal care products, such as are sold in spas, salons and beauty boutiques at the local mall.

Legalization presents the opportunity to implement regulations that correlate with the realities of these various products. Looking at the history and current societal attitudes regarding marijuana—and obviously the federal government’s contrary position—it is reasonable to assume that the psychoactive effects associated with marijuana are what the federal government and society in general want to see controlled with limited access to children. This is understandable. But what to do about products that contain cannabis yet don’t cause the ‘marijuana high’? This is the challenge faced by producers of Cannabis-Infused Topical products and, by extension, Oregon legislators and consumers.

The Oregon Infused Topical Association supports exempting cannabis-sativa infused health and beauty aids containing not more than 1% THC from the sales regulations of MEASURE 91 that otherwise apply to high-THC marijuana flowers, marijuana concentrates, and marijuana-infused ingestible products/edibles.

² “Governing States and Localities”, NIPG, January 20, 2015, <http://www.governing.com/gov-data/state-marijuana-laws-map-medical-recreational.html>, accessed February 13, 2015.

History of *Cannabis Sativa* in medicine and in healing

Very few drugs if any have such a tangled history as a medicine,” observed EA Carlini.³ “In fact, prejudice, superstition, emotionalism and even ideology have managed to lead cannabis to ups and downs concerning both its therapeutic properties and its toxicological and dependence-inducing effects.”

Without question the history of cannabis in the United States is clouded by political intrigues. Yet despite marijuana’s current federal classification as a Schedule 1 drug credited with “no currently accepted medical use,” some physicians and the public alike seem to be changing their opinion. Instead of perceiving cannabis as a highly addictive substance with no medical value, per definitions of a Schedule 1 substance, it is increasingly being seen as showing promise in combatting diverse medical ills.⁴

As a folk medicine, cannabis sativa has been used to treat an “endless variety of human miseries.”⁵ An Irish physician, WB O’Shaughnessy working in Calcutta, India, in the 1830s is credited with “discovering” the healing potential of Indian hemp and exposing his findings to western medicine. The list of indications for which he recommended cannabis has remained remarkably unchanged since. As of 1854 the medical use of cannabis received official legitimacy by its listing in the US Dispensary.

However by the 1930s the days of using cannabis as a legitimate treatment were numbered. This push did not come from the medical community, however. Indeed, in 1937 over the objection of the American Medical Association and pharmaceutical companies at the time, the Federal Bureau of Narcotics pushed for congressional passage of the Marihuana Tax Act, and in 1942 cannabis sativa was stripped from the US Dispensary after nearly a century.

Ultimately in 1970 Congress, citing their perception of marijuana’s potential for abuse and addiction, declared cannabis to have no medical value, rending illegal a plant that had been used medicinally throughout the world for thousands of years.⁶

Prohibition notwithstanding, cannabis never fell out of favor in alternative medicine. Its therapeutic properties have been particularly favored by former recreational users who have found it to be effective in treating various ailments. In response the medical marijuana cultivators and alternative healers have developed a myriad of products that replicate the time-honored health and beauty formulas used throughout millennia, updated to contemporary safety standards and informed by the limited research outcomes from this country and the extensive research being conducted in Israel, Japan and Germany.

³ Bostwick, J. Michael, MD, “Blurred Boundaries: The Therapeutics and Politics of Medical Marijuana,” Special Article, Mayo Clinic, Department of Psychiatry and Psychology, Mayo Clinic, Rochester, MN, 2012, Mayo Foundation for Medical Education and Research.

⁴ Bostwick, J. Michael

⁵ Pertwee, RG, “Cannabinoid pharmacology the first 66 years,” *Journal of Pharmacology*, 2006;147.

⁶ Bostwick, J. Michael.

*Let's be honest: The real "problem" with cannabis is the 'marijuana high.'
Ask any random sample of Americans and the 'marijuana high' is their first
response to cannabis. Few Americans know--and virtually none are left who
can recall--that cannabis was once considered a legitimate healing herb.
Political fears about mind-altering substances were used to justify the ban.*

But what if there was no 'high'?

Healing without the High

THC (Tetrahydrocannabinol), the psychoactive ingredient in cannabis ranges from less than 0.2% in fiber-type hemp to 30% or more in the flowers of hybridized sinsemilla. However, the average THC content found in marijuana in the United States in 2006 was 8.5%.⁷ Ten years earlier two medical researchers from the University of Virginia Medical College established the dosages of THC required to induce pharmacological effects in humans from smoking, considered the most direct pathway into the bloodstream and which creates the most profound psychoactive effects to be 9-23%.

Only 1% of the THC *smoked* in a cannabis cigarette makes it to the brain, according to the National Institutes of Health. So even if the 1% of THC in topicals might make it into the bloodstream just 1% of 1% (0.01) would actually reach the brain.⁸

Compare this information to cannabis-infused topical products and it becomes clear that the 1% THC standard is so low that it would be virtually impossible for any consumer to experience psychoactive effects from using lotions, salves, balms, or other personal care products on the skin. The reasons are twofold.

- First, the THC level in topical products tends to be far lower than that in smoking or edible products.
- Second, topical products are applied to the skin's surface and with the exception of mucus membranes the skin is lined with a tough outer layer of epidermis, and muscle layers that protect the bloodstream.

⁷ *Ibid.*

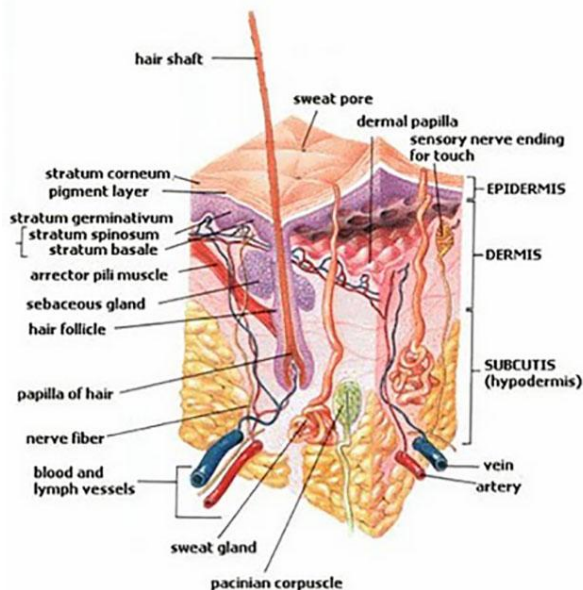
⁸ Adams, IB and Martin, BR; "Cannabis: pharmacology and toxicology in animals and humans," Medical College of Virginia/VirginiaCommonwealth University, Richmond, VA, Pub Med, "Addiction 1996: 91(11)-1585-614, Pub Med, US National Library of Medicine, National Institutes of health.

While it's not impossible for cannabis-infused topicals made with certain carrier substances to fight their way into the bloodstream, by the time they arrive they no longer are strong enough to cause a psychoactive effect.

(NOTE: This discussion does not include transdermal patches, which have much higher amounts of THC and much like nicotine patches, do contain carrier ingredients that propel THC into the bloodstream and potentially cause intoxication and a positive drug test. The common dosage for transdermal patches ranges from 10 mg to 20 mg and more THC, and the patches are designed to break through the skin's barriers and are advertised as lasting from 8 to 12 hours.⁹)

When talking about topical products, it's important to understand how they are made and how they work.

How topicals work with human skin.¹⁰



The skin is composed of three resilient layers which regulate absorption and retention. The molecular structure of many ingredients are simply too large to otherwise penetrate the outer layer of skin. The molecular size of the ingredients prevent most cosmetic and skincare products from going beneath the skin's surface.¹¹

PENETRATION FACTS

"Any chemical you want to get to cross skin is effectively swimming upstream against the current."

"We have a pretty good idea of what does and doesn't penetrate the skin, and most things don't."

"But even for the small number of ingredients that can get through, the skin contains enzymes that break down chemicals into smaller and smaller and easier-to-handle materials. So the small proportion that gets through is quite likely to have been transformed before reaching the bloodstream."

"It is impossible to know what the true figure of what you apply to the skin gets through to the bloodstream, but basing it purely on my own work, I'd put the figure below 1%."

"In the case of infused topicals that means 1% of 1% THC."¹⁰

⁹ The CPC, "THC Transdermal Patch by Mary's Medicinals," <http://thecpc.org/menu/thc-transdermal-patch-by-marys-medicinals/>, accessed February 13, 2015.

¹⁰ Colin, cosmetic scientist blog, "60% of what you put on your skin is absorbed," July 19, 2011, <http://colinsbeautypages.co.uk/60-of-what-you-put-on-your-skin-is-absorbed>, accessed February 13, 2015.

¹¹ Corkill, Katherine, "Skin Penetration Enhancers: Friend or Foe," March 9, 2011; <http://personalcaretruth.com/2011/03>, accessed February 13, 2015.

‘Topically applied marijuana extracts have been found to be extremely effective for the treatment of pain, and do not exert any psychoactivity whatsoever.’ -Dr. Alan Shackelford, Denver

Why We Use Cannabis

Cannabis plants contain some 85 distinct compounds. Clinical trials and the experiences of hundreds of thousands of patients have shown that THC and strains of marijuana containing THC provide important medical benefits for individuals suffering from pain, MS, nausea, and other conditions. The federal government has recognized the medical properties of THC for 30 years. In 1985 the FDA approved a prescription drug called Marinol, made of synthetic THC. Ironically, many patients report Marinol to be less effective at relieving pain and more intoxicating than natural THC—probably because other cannabinoids moderate THC’s psychoactive properties. So even the US government, which continues to ban marijuana, acknowledges its medical efficacy. But to find its true medical efficacy, we have to look to research coming from other countries.

A recent Italian study shows that it appears to be excellent in combatting skin cancer.¹² Another study, this time from Japan, shows that cannabinoids can reduce up to 90% of skin cancer in just 20 months, and inhibited tumor promotion.¹³

Scientists speculate that the body makes chemical compounds similar to the active ingredients in marijuana and that these compounds play an important part in maintaining healthy skin.¹⁴

Cannabinoids can reduce up to 90% of skin cancer in 20 weeks according to research from Japan.

Endocannabinoids are being used to treat skin conditions ranging from acne to dry skin, to skin cancer to skin-related tumors.¹³

¹² Pucci, M., et.al, “Epigenetic control of skin differentiation genes by phytocannabinoids,” British Journal of Pharmacology, Sept. 17, 2013; onlinelibrary.wiley.com/doi/10.1111/bph.12309/abstract, accessed February 14, 2015.

¹³ Nakamima, J., Nakae, D., Yasukawa, K., “Structure-dependent inhibitory effects of synthetic cannabinoids against 12-O-tetradecanoylphorbol-13-acetate-induced inflammation and skin tumour promotion in mice,” May 21, 2013; onlinelibrary.wiley.com/doi/10.1111/jphp.12082/abstract; accessed February 14, 2015.

¹⁴ Federation of American Societies for Experimental Biology, “Body’s own ‘cannabis (marijuana)’ is good for the skin, scientists find,” July 3, 2008; www.sciencedaily.com/releases/2008/07/0807021; accessed February 14, 2015.

Even though you get more CBD compared to THC in industrial hemp, it's not a bountiful source of cannabidiol compared to CBD-rich cannabis.¹⁵

The Truth about Hemp and Marijuana

Industrial hemp and marijuana are both classified by taxonomists as *Cannabis sativa*, a species with hundreds of varieties. With all the excitement about the healing potential of CBDs hemp is finding its way into many products, including personal care products. It's important to understand the differences. So we turned to the North American Hemp Council Inc. to explain.¹⁶

- While industrial hemp and marijuana are both classified by taxonomists as *Cannabis sativa*, industrial hemp is bred to maximize fiber, seed and/or oil; marijuana varieties seek to maximize THC and increasingly CBD.
- Industrial hemp has a THC content between 0.05 and 1.5%.
- Marijuana has a THC content of 3% to 20% or more.
- If hemp should pollinate marijuana, the result is always lower-THC marijuana, not higher-THC hemp.
- While industrial hemp and marijuana plants look somewhat alike to laypersons, a cannabis producer can easily tell the difference between these strains.
- The high CBDs attributed to industrial hemp seed oil is achieved not naturally in the plant, as with marijuana, but by reducing down vats of very low CBD oil, which is considerably less effective in healing (despite the claims of some producers).

CBD is not a product or component of hemp seeds and labeling products to that effect is misleading and motivated by a desire to take advantage of the gray area of CBDs under US federal law.¹⁷

¹⁵ O'Shaughnessy's online, www.beyondthc.com/cbd-from-hemp/; accessed February 15, 2015.

¹⁶ Scientific Facts, North American Industrial Hemp Council Inc., naihc.org/hemp_information/hemp_facts.html; accessed February 15, 2015.

¹⁷ Rucke, K., "Hemp Oil v. CBD Oil: What's the Difference?", Mint Press News, July 15, 2014; mintpressnews.com/hemp-oil-versus-cbd-oil-whats-the-difference/193962/; accessed February 15, 2015.

Studies now show what patients have said for years:

Cannabis is good for your skin!

Skin Conditions and Cannabis Topicals¹⁸

Acne

85% of Americans will experience acne at some point during their lifetimes and Americans spend \$2 billion annually on acne treatment and prevention. Studies from Hungary support using cannabis to combat acne.

Eczema

More than 30 million Americans have eczema. Triggers are often environmental or stress-related. Cannabis, specifically THC, when applied topically has been found to effectively lessen contact allergic inflammation. The treatment is applied to and absorbed at the site of inflammation.

Psoriasis

As many as 7.5 million Americans have this autoimmune disorder, which is most often hereditary. Topical therapies are appropriate in most cases. Due to the anti-inflammatory properties of cannabinoids (CBD) and the regulatory effects of THC on the immune system cannabis lotions have been found to be effective.

Rosacea

An estimated 16 million Americans have this condition that causes facial redness and dryness. The most common triggers are environmental (extreme weather, certain foods, cosmetics) and stress. Because cannabis can reduce inflammation, immune response and stress, topical applications can be an effective treatment.

Skin Cancer

More than 3.5 million skin cancers in 2 million people are diagnosed annually in America. It is the most common form of cancer in the country. In general medical marijuana is beneficial to cancer patients, and due to its therapeutic properties cannabis can be particularly effective in treating skin cancer. Because cannabis is an antioxidant, it can help slow down the damage to skin cells from oxidation by free radicals—especially important in skin cancer cases because antioxidants play a role in preventing the spread of cancer.

¹⁸ "Cannabis is more than skin deep," United Patients Group, April 8, 2014; UnitedPatientsGroup.com; accessed February 14, 2015.

Maybe you've heard of a little girl named Charlotte who suffered from seizures and how her parents started treating her with a special kind of cannabis that was high in cannabidiol or CBD. That little girl didn't get high—she got better.

Those same plants are in our products.

The CBD Story

Cannabidiol or CBD is another compound found in cannabis that appears to have significant health benefits based on medical research and anecdotal evidence. Cannabidiol or CBD does not make people feel “stoned.” (Indeed, it can actually counteract the psychoactivity of THC.) Because CBD-rich cannabis doesn't produce the ‘marijuana high,’ it is an appealing treatment option.

Indeed, the CNN medical correspondent Dr. Sanjay Gupta changed his mind about the medical efficacy of cannabis after learning about the CBD-rich strains, which are especially effective in treating seizure disorders. He took that message to the American people in a pair of specials on medical marijuana.

Because of all the popular and emotion-driven press that CBDs have been getting in recent years—coupled with the fact that they do not result in the ‘marijuana high’ that so many find objectionable—many people are confused. They imagine that CBDs are all-important, certainly more important in healing than the THC compound; and that all CBDs are created equal.¹⁹ They are wrong!

CBD and THC enhance each other's therapeutic effects.

CBD enhances the benefits of THC while reducing side effects.¹⁶

Substances like THC are necessary for healthy skin and may lead to new skin-disease treatments.²⁰

¹⁹ Lee, Martin A., “Project CBD Responds to SAM's CBDisinformation,” January 28, 2014; www.projectcbd.org/news/project-cbd-responds-to-sams-cbdisinformation-2/; accessed February 14, 2015.

²⁰ Federation of American Societies for Experimental Biology, “Body's own ‘cannabis (marijuana)’ is good for the skin, scientists find,” July 3, 2008; www.sciencedaily.com/releases/2008/07/0807021; accessed February 14, 2015.

Low-THC Oil Infusion

Many people find the taste and smell of the cannabis plant unpleasant, so producers of low-THC cannabis-infused topical products often first decarboxylate the dried plant material before adding it to the oil to be infused in order to remove the taste and smell. *(While decarboxylation sounds complicated and even mysterious, it really isn't. It's just a fancy name for exposing the plant material to low heat for a period of time.)* Decarboxylation releases the compounds including THC so that they will easily adhere to the oil molecules.

Once the plant material has been decarboxylated, it is measured and mixed into olive oil or shea butter, or any of the common carrier oils selected for their attributes. For example, grape seed oil is often found in pain-soothing products because of its natural analgesic properties, while apricot kernel oil is used in virtually all commercial cosmetic products because it emulates the natural secretions of human skin.

The cold-infusion process is much like aging wine. The oil with its healing herbs becomes infused over period of time while stored in vats in cool, dark rooms, and gently agitated to free the cannabinoids from the dried plant matter that is ultimately discarded.

Some producers use a warm-infusion process that gently heats the oil and plant material, much the way that sun tea is infused on the back porch on a sunny afternoon.

The method used depends upon the producer and the materials selected.

(Products with 1% or less THC are made with traditional botanical infusion techniques. Those with high THC numbers are most often made using concentrates, a different process.)

How topicals are made

(NOTE: This white paper describes the production process in only the most general of terms. Product-specific details concerning ingredients and production are considered proprietary.)

Doubtlessly you've seen bottles of olive oil with sprigs of say, rosemary or basil, floating inside? It's not just for looks, although they are beautiful. The oil is infused as it picks up the scent and flavor—in other words, the essence—of the herb. Making low-THC cannabis-infused topical products is based on a similar process.

All salves, lotions, balms, and creams begin with oil. Botanical personal care products, which are commonly found in salons, spas, boutiques and even pharmacies and on supermarket shelves are made with oil infused with herbs.

A tiny amount of cannabis is the
only difference between our
botanically infused personal care
products and those sold in stores
everywhere.

The process of making lotions is no mystery and has changed very little over the years. You could even make lotions on your stovetop from a recipe found on the Internet. Several commercial cosmetic companies started in the 20th century began just that way.

The push for freshness and handcrafted organic products has created a cottage industry that produces individualized personal care products. We are proud to be among those bringing quality, organic, pesticide-free botanical products to market.

There's no lack of testimonials to the effect that cannabis-infused ointments and lotions are an effective alternative for treating a variety of medical conditions beyond superficial skin disorders.²¹

Only rarely and quite recently have studies looked at topical, non-transdermal applications of cannabis. At least one study found that human skin contains cannabinoid receptors, which indicates that topical applications of cannabis could have an effect on skin conditions. At least one study showed that topical cannabinoids have a positive effect on severe itching. In that 2006 study, 14 of 22 patients had a reduction in severe pruritis (itching) when an emollient cream containing endocannabinoids were applied to the skin. No patient experienced side effects.

A 2007 study showed a significant decrease in inflammation caused by contact skin allergy, and the study's authors suggest that cannabinoid compounds may provide an enhancement to the therapeutic treatment for humans.

Without good studies proving that topical cannabis preparations are effective for more than skin conditions—eg., for joint pain—it's hard to determine the actual efficacy of infused-topical products. This is an area that is ripe for study. It may be that cannabis combined with other ingredients adds to the beneficial effect.

Cannabis-infused topical preparations do work, but clearly more studies need to be done. Unfortunately, so long as cannabis remains classified as a Schedule 1 substance, the FDA will not be evaluating the effectiveness of the cannabis-infused topicals being produced and being used regularly as part of a medical marijuana regimen in this country.

Cannabis salves, lotions and ointments can be effective treatments for certain skin conditions such as burns, infections and rashes. Researchers are also looking at them as treatments for skin cancer. In the future we can anticipate additional studies of medical efficacy and cannabis, as well as increasingly sophisticated delivery methods and formulas.

Topical preparations are a good addition to the medical arsenal that this herb can provide.²²

²¹ Smith, C., "Topical Cannabis Preparations: Snake Oil or Healing Options," www.compassioncenter.net/topical-cannabis-preparations; accessed February 15, 2015.

²² *Ibid.*

PRODUCT SAFETY

The FDA and Infused-Topical Products Testing Regulations

The US Food and Drug Administration (FDA) classifies creams and lotions as cosmetics, so they are regulated less strictly than drugs. Products don't undergo the same rigorous testing for safety and effectiveness that topically applied medications undergo before approval to go on the market.

The FDA defines "cosmetic" to mean: products intended to be rubbed, poured, sprinkled or sprayed on, introduced to or otherwise applied to the human body for cleansing, beautifying, promoting attractiveness or altering the appearance. The conundrum with cannabis-infused topical products is that they at least appear to have the capability of also acting as a pain-reducer for some conditions, such as aching muscles or arthritic joints. Strictly speaking by the FDA's own regulations any preparation that is intended for the "diagnosis, cure, mitigation, treatment, or prevention of disease, or to affect the structure or any function of the body may also be subject to regulation as a drug. Of course, so long as cannabis remains classified as a Schedule 1 substance by the federal government, there can be no pre-market testing by the FDA.

The FDA does approve cosmetic products and ingredients before they go on the market. They also do not have a list of tests required for any particular cosmetic product or ingredient.

The manufacturer or distributor of a cosmetic is legally responsible for ensuring that a marketed product is safe when consumers use it, according to the directions in labeling. And the FDA can take action against any cosmetic manufacturer if they have reliable information showing that a cosmetic does not meet legal safety requirements.²³

The Oregon Infused Topical Association supports product testing before the products go to market to ensure the purity of the product as well as the percentage of THC and CBD contained.

²³ US Food and Drug Administration, "Guidance for Industry-Complementary and Alternative Medicine Products and their Regulation by the FDA," December 2006; www.fda.gov/regulatoryinformation/guidances/ucm144657.htm; accessed February 15, 2015.

PRODUCT DISTRIBUTION

Expanding the Marketplace

The OLCC (Oregon Liquor Control Commission) is charged by law with regulating all the cannabis sold in Oregon. The Oregon Infused Topical Association supports this model. Our members will be applying for licenses related to the handling of THC-rich marijuana as it relates to growing the plant and processing the plant to become an ingredient in our infused topical products, such as lotions, creams, salves, etc., as described earlier in this paper.

However, because the product in its finished form will contain no more THC than is associated with hemp, we request that all cannabis-sativa-infused products containing less than 1% THC be exempt from wholesale and retail licensure requirements, for reasons detailed earlier in this paper.

We also propose that all infused topical products containing less than 1% THC be exempt from restrictions that limit product sales to OLCC stores. We believe there is no reason to limit access to these highly effective products that contain no more THC than that found in hemp-oil products sold in drugstores and supermarkets.

OITA proposes that topical products
containing less than 1% THC be allowed
wide distribution within the state.

Expanding the Market: A Win-Win for Oregon!

Expanding this market is a win-win for Oregon because it will generate increased sales revenue through broadened distribution channels, and create opportunities for job growth and small businesses in this rapidly expanding industry.

Initially the number of OLCC stores will be somewhat limited, especially in the first few years as the program becomes established. Even if that weren't the case, shelf space is limited in all retail operations. Understandably most of that precious shelf space will be going to high-THC ingestible products due to the recreational market demand. Based upon experience in Colorado and Washington, and on the current layout of dispensaries here, it is reasonable to assume that topicals will get very little shelf space, thus limiting customer access.

Allowing cannabis-infused topicals with less than 1% THC to be sold in hair salons, spas, boutiques, alternative-medicine clinics, organic food markets, shops in retirement centers, home parties and farmer's markets will better-serve Oregonians by providing them with convenient, easy access to safe, high-quality, locally produced products (the cannabis-infused products must be made in Oregon, after all).

Increased sales equals increased economic opportunity. Until the federal government changes its position, none of the national health and beauty products suppliers will enter the cannabis-infused topical market—they simply can't afford to. This means that the market will by necessity continue to be supplied by local entrepreneurs who purchase local cannabis and hire local workers to produce, package and market the lotions and creams. The emerging marijuana industry is projected to be worth billions in the next few years. Expanding access to trace-THC topical products simply makes sense for consumers, small business and economic development throughout Oregon.

Ellyn Ford

A successful entrepreneur and small-business owner in Portland, Ellyn Ford has more than a decade's experience in corporate strategic marketing. Her area of specialization was discovering new markets and meeting their needs. After leaving the corporate environment a dozen years ago, she established a highly successful small business that is based in Oregon and which has customers throughout the United States. She holds an MS-MBA from San Francisco State University in California.

Jean Wilson

With more than 20 years of experience as a customer service manager in the durable medical equipment business, Jean Wilson has a unique understanding that enables her to effectively interface with sick and injured patients. A Portland native, she knows and understands the medical marijuana community of patients and providers. A medical marijuana patient for several years, she uses cannabis as part of her medical regimen to treat her own debilitating chronic illness.

The Small-Business Connection

Jean Wilson and Ellyn Ford have built a successful glass art company from their Portland studio over the last eight years. Their unique products are sold in more than 160 stores in Oregon and some 1,200 nationally. They have extensive experience in meeting client's needs efficiently and have developed enviable distribution models that enable them to ramp-up distribution rapidly as needed. Their company, **Eye for the Find**, has a national reputation for providing high-quality, unique products for personal use and for the home.

They are currently expanding their focus to include cannabis-infused topical products. After evaluating the limited number of cannabis-infused topical products available in Oregon, they decided to bring their business expertise and their belief in the market to a new venture: **Clear Creek Botanicals**.

Clear Creek Botanicals is developing a new line of cannabis-infused topical products to provide medical marijuana patients and eventually all Oregonians with more choices. All the products tested show less than 1% THC, yet the volunteer product testers who are not regular marijuana users report that these lotions, salves and personal care products are highly effective despite the trace amount of THC. No one testing the products has reported any psychoactive effects and none has failed to pass a drug test.



Made from sun-grown, organic, pesticide-free cannabis.