

| Recommendation                                                                               | Legislative action                                                                                                                                                                                                                                                                                                                       | Regulatory/rules action                                                                                                                                                                                                                                                                                                                    | Notes / additional information                                                                                                                              |
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| 1. Product scope is defined / limited to non-GRAS packaged food and dietary supplements only | Product Scope is limited to non-GRAS packaged food for human ingestion and dietary supplements for human consumption                                                                                                                                                                                                                     | The appropriate state regulatory body will outline processor requirements and restrictions, including any relevant testing methods consistent with processing methods.                                                                                                                                                                     | Separate file from definitions group with more information.                                                                                                 |
| 2. Establish 2 product categories                                                            | Categories are defined as Food and Dietary Supplements                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                            | Find relevant WAC / RCW to refer to definitions of these categories                                                                                         |
| 3. Hemp in food will be allowed if it adheres to certain safety requirements                 | Allowed levels of cannabinoids will be evaluated <b>periodically</b> to incorporate best available science and stakeholder input.                                                                                                                                                                                                        | Hemp in <b>packaged food</b> cannabinoid limits: <ul style="list-style-type: none"> <li>Not exceeding x mg of CBD per serving and package.</li> <li>Not exceeding x mg of Class A cannabinoids per serving and package.</li> <li>Not exceeding x mg of Class A and Class B cannabinoids (in sum total) per serving and package.</li> </ul> | Informational summary document has been prepared by WSDA and group is evaluating the various jurisdictions and data to determine reasonable safe levels (x) |
|                                                                                              | Hemp in packaged food is allowed if the product meets safety standards for contaminants, established for food and beverages by applicable federal and state laws and regulations, including 21 CFR 117, WA state food laws and any other additional WA state hemp regulations implemented. Hemp in dietary supplements is allowed if the | Hemp in <b>Dietary Supplements</b> cannabinoid limits: <ul style="list-style-type: none"> <li>Not exceeding x mg of CBD per serving and package.</li> <li>Not exceeding x mg of Class A cannabinoids per serving and package.</li> <li>Not exceeding x mg of Class A and Class B cannabinoids</li> </ul>                                   |                                                                                                                                                             |

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|                                                          | product complies with 21 CFR 111 and any other WA state hemp regulations implemented.                                                                            | (in sum total) per serving and package.                                                                                                                                                                                                                                                                                                                            |                                                                                                                                              |
|                                                          |                                                                                                                                                                  | Enforceable Safety Standards will be set for contaminants in different product categories                                                                                                                                                                                                                                                                          |                                                                                                                                              |
| 4. Hemp products will require lab testing to be marketed | Hemp products will have to undergo testing. Testing standards will be evaluated <b>periodically</b> to incorporate best available science and stakeholder input. | Final packaged products should be screened for cannabinoids and <b>microbial panel</b> on final/packaged product (each batch/lot)                                                                                                                                                                                                                                  | Do we think this Task Force should decide on other contaminant lists and action limits or do we leave that to the regulatory body to decide? |
|                                                          |                                                                                                                                                                  | Testing should be completed by lab that has been ISO-17025 2017 accredited for those compounds and has detection levels that are less than or equal to the thresholds set.                                                                                                                                                                                         |                                                                                                                                              |
| 5. Labeling of products should occur                     | Products will follow 21 CFR 101 and WA state food labeling requirements and any other WA hemp in food requirements<br><b>Rules or leg?</b>                       | Label statements to include:<br>For food/beverage products: Class A compounds and any other marketed compound names should be declared on the Primary Display Panel and milligram amounts on the Information Panel.<br>Dietary supplement products: Compound names to be declared in the Primary Display Panel and milligram amounts on the Supplement Facts panel |                                                                                                                                              |
| 6. Reconciliation of federal food/drug law               | Allowed “articles” according to <b>x</b> mg CBD limitation defined as “safe” above are NOT                                                                       |                                                                                                                                                                                                                                                                                                                                                                    | Might need some language clean-up here?                                                                                                      |

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|                                                                            | considered “substantially equivalent” to the prescription drug Epidiolex due to a 10X minimum difference in dosage/serving size of CBD |  |                                                                                                                             |
| 7. “sunsetting” of guidelines to occur if federal rules allow hemp in food | “Sunset” <b>may be</b> triggered if federal regulatory pathway is created for hemp in food and/or dietary supplements.                 |  | What is the precedent for language regarding sunset clauses? Do we want to include language that protects WA hemp business? |
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