



1440 "G" Street, NW; 10th Floor, Washington, DC 20005

July 15, 2019

Food and Drug Administration
Division of Dockets Management
Docket FDA-2019-N-1482
HFA-305
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Re: Public Comments Submission (Docket FDA-2019-N-1482)
Scientific Data and Information about Products Containing Cannabis or
Cannabis-Derived Compounds

Dear Sir/Madam:

On behalf of the National Industrial Hemp Council (NIHC), and in response to the U.S. Food and Drug Administration's (FDA) request for comments on Scientific Data and Information About Products Containing Cannabis or Cannabis-Derived Compounds, published in the April 3, 2019 edition of the Federal Register, we hereby submit the following comments.

NIHC is the global advocate for North American industrial hemp, promoting the sustainable long-term growth and profitability of the industry. We are the professional trade association representing all industry segments from farmer to manufacturer, distributor, retailer and all the way to the consumer. To learn more about NIHC, please see <https://hempindustrial.com/>

We understand that the FDA has a difficult job to do and we are very appreciative of the intense focus on this issue. Thank you for holding the important public hearing on May 31, 2019 and for providing this public forum allowing stakeholders to register their perspective regarding these important issues.

NIHC strongly believes that consumers have the right to fact-based information and to be able to safely use products. The safety and education of consumers is a paramount goal of the NIHC. The research findings presented at the May 31st hearing indicating the presence of low-quality CBD products in the market should be very concerning to all in the industry. The work of the FDA in this regard is critical to safety and protection of the public. Consumers should have access to the benefits of CBD and other hemp-derived products, safely.



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CBD products are on the market and have been for some time. Consumer demand for these products is real and substantial. As a wholesale removal of products from the market is not a viable option, we encourage the FDA to adopt sensible rules that permit the continued safe use of hemp-derived and CBD-infused products.

We appreciate the actions of those in Congress such as Senator Wyden and Congressman McNerney, who have demonstrated strong support for this industry and established a clear indication of the importance of protecting its opportunity to continue to grow.

It is important to note that many CBD producers have established relationships and procedures with testing and accreditation laboratories and adhere to good manufacturing procedures. Establishing such a requirement could be a viable step to ensure low-quality products are not present in the marketplace which could present significant risk to consumers.

NIHC encourages the FDA to continue to engage with the industry in a constructive manner as the policy development process moves forward. We stand ready to continue in constructive dialogue with you.

Regards,

Patrick Atagi
Chair, Board of Directors
National Industrial Hemp Council
patagi@hempindustrial.com