



July 20, 2020

Dear Members of the House of Representatives,

The Veterinary Cannabis Society urges you to support H.R. 5587, to include hemp derived CBD products in the definition of dietary supplements under the Federal, Food, Drug and Cosmetic Act (FDCA).

Veterinarians, and the entire medical profession, are on the forefront of embracing an entire new class of medicinal products. Multiple studies and clinical trials have shown cannabidiol (CBD) to be safe in dogs and cats. Additionally, CBD has been proven to be effective for the treatment of dogs with seizure disorders, anxiety, and pain associated with osteoarthritis. More research is under way to evaluate potential benefits of CBD for dogs, cats, horses, and other companion animals.

Skyrocketing interest by the public regarding the use of cannabinoids has put veterinarians on the front lines of the debate regarding the use of CBD for animals. Hemp-derived CBD products are widely available over the counter despite minimal oversight by the FDA, and pet owners are routinely purchasing these products and administering them to their pets. Multiple surveys and reviews into over the counter CBD products have demonstrated significant inconsistencies in labeling. In a recent FDA survey by the National Center for Natural Products Research, CBD products tested showed results as low as 45% label accuracy.

Even more problematic than inaccuracies in the amount of CBD in a product, harmful contaminants also pose a threat. Heavy metals, bacteria, mycotoxins, and pesticides have all been found in CBD products. It is imperative the FDA enact the proper regulatory oversight to ensure product quality and safety while simultaneously allowing for practical use and availability of this beneficial supplement.

Nearly all practicing veterinarians in the United States are fielding questions from clients regarding CBD. Many pet owners have experienced benefits from CBD firsthand, and those who have not, remain curious about its potential benefit for themselves and their pets. The lack of regulation however, has resulted in unethical producers of CBD products putting consumers and animals at risk. Veterinarians are struggling on a daily basis to provide their clients with an accurate interpretation of product quality, safety and labeling.

While everyone agrees on the need for ongoing research into the medical applications of CBD for both animals, the reality is people are already giving these products to their pets. Public demand and the potential dangers posed by inaccurate labeling and unethical producers warrants pragmatic regulation terms of label claim restrictions, labeling accuracy, cGMP enforcement, and monitoring for potential adulterants.

By supporting H.R. 5587 and including hemp-derived CBD as a dietary supplement within the FDCA, the necessary regulatory framework will be established, safeguarding consumers and their pets. The Veterinary Cannabis Society wishes to see accepted use of cannabinoid therapies in our animal patients when indicated, and we demand safe and responsible use.

We urge you to support H.R. 5587 and implore the FDA recognize the monumental benefit of cannabinoids as a dietary supplement. We ask you help safeguard the health and wellbeing of our patients as well your own four-legged family members.

We thank you for your consideration.

Most sincerely,

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