



February 22, 2021

Dear AAVSB,

The widespread availability of hemp-based CBD products presents a unique challenge to the veterinary profession. Unlike other nutritional and herbal supplements, the legality of hemp extracts has been questioned by some states, leading to State Board policies that range from ambiguous to outright hostile to veterinarians. Nonetheless, the 2018 Farm Bill brought hemp extracts, including CBD, closer to full legalization and opened the floodgates to the production, marketing, and sales of products for pets.

The policies enacted by Veterinary State Boards bring into focus their need for guidance on this critically important issue. Veterinary clients are asking their veterinarians every day about CBD, and the profession as a whole has been reluctant to do what we do best, provide medical guidance for our clients and treatment for our patients. The AAVSB is in a unique position to offer a policy framework to Veterinary State Boards which would protect veterinarians from disciplinary action for merely doing their jobs. In order to accomplish this however, it is critically important the language used by AAVSB is as accurate and specific as the policy guidelines themselves.

Misunderstandings of terms related to cannabis have played a large part in the confusion that has led to the current situation facing our profession. For clarity, the following commonly used terms are defined as follows:

- **Cannabis**- Plants of the species *Cannabis sativa*. The federal legality of cannabis is dependent on its THC content
- **Marijuana**- federally defined as cannabis plants producing greater than 0.3% THC
- **Hemp**- federally defined as cannabis plants producing less than or equal to 0.3% THC
- **Cannabinoid** refers to the various compounds produced by the cannabis plant that have physiologic effect through interactions with neurotransmitters within the body
- **THC**- Tetrahydrocannabinol is the main intoxicating cannabinoid found in cannabis. Cannabis plants producing greater than 0.3% THC are defined as “marijuana” and are federally illegal
- **CBD**- Cannabidiol is a non-intoxicating cannabinoid produced by the cannabis plant. Research has shown CBD to have medical benefits in veterinary patients. CBD is produced both by hemp and marijuana plants and its legality is dependent on the THC content of the plant it was extracted from

These definitions are important because they govern the language that must be used in any guidelines, policy, or legislation. For example, CBD can be federally legal or illegal depending on if it was extracted from a hemp versus a marijuana plant. In addition, CBD is one of many cannabinoids produced by

hemp plants and future hemp-based products will “feature” other cannabinoids such as CBG. Therefore, when defining products the AAVSB is in favor of veterinarians “discussing” or “recommending,” the terms “hemp” and “hemp extracts” should be used rather than “CBD” in order to avoid inadvertently excluding other beneficial compounds found in hemp and, more importantly, to avoid endorsing veterinary recommendation of CBD from marijuana, which would be federally illegal.

Additionally, with one exception, there are no FDA approved cannabis medicines (CBD or otherwise) and, as such, no veterinarian or physician can “prescribe” these medications. Legally speaking, “recommend” is the most that will be possible until there are FDA approved products for veterinary patients.

Lastly, is the determination if veterinarians should be able to dispense hemp extracts from their clinic. Every day veterinarians dispense non-FDA approved supplements such as glucosamine without any interference from their Veterinary State Board. Hemp extracts and CBD have been shown in multiple studies to be effective and have an extremely wide margin of safety. Hemp extracts should be viewed as no different than any other nutritional or herbal supplement commonly dispensed by veterinarians. When veterinarians dispense a supplement, we are able to ensure our patient is receiving a high-quality product. By forcing pet owners into the marketplace to buy hemp extracts, we leave them at the mercy of overly aggressive (and sometimes illegal) marketing and product claims, as well as products that may be improperly labeled, ineffective, or even potentially contaminated. No one is better qualified to evaluate these products than a trained veterinarian. Dispensing hemp extracts from veterinary offices, when not prohibited by state law, is a safety measure to protect animals.

By creating guidelines for Veterinary State Boards to follow with regards to hemp and hemp extract policy, everyone benefits as long as the language and terminology are accurate. Pets are healthier when they receive safe and effective medicine recommended by their veterinarian, clients are better informed, veterinarians are better health care providers, and the hemp industry as a whole has greater incentive to produce high quality products that veterinarians will recommend.

Thank you for your willingness to provide guidance to the veterinary profession. Please feel free to contact us if you have any questions or would like to discuss this further.

Sincerely,

Gary Richter, MS, DVM
Veterinary Cannabis Society Co-Founder and Vice-President
www.VeterinaryCannabisSociety.org