

Comments on cannabis radiation labeling regulations

NCCR 12.065

Submitted by:
Jill Ellsworth, Founder & CEO
On behalf of Willow Industries, Inc.

Thank you for the opportunity to comment on NCCR 12.065, the regulation concerning labeling requirements for cannabis treated with radiation. We appreciate the Cannabis Compliance Board holding a public workshop on this important regulation, and **strongly support leaving the regulation as adopted on July 21, 2020.**

As you surely know, the federal government's prohibition on cannabis for both medical and adult use means that cannabis products are not subject to the same federal regulations as other consumable products sold in Nevada. Because of this, it is up to state governments to adopt and enforce their own regulations to protect public health and help consumers make educated choices.

The Food and Drug Administration requires the Radura symbol, along with the statement "treated with radiation" or "treated by irradiation," to be included on irradiated food products that are sold to consumers. This applies to a wide variety of products, including plants like lettuce, spinach, alfalfa sprouts, and fresh fruits and vegetables.¹

Since cannabis is a consumable plant product, it makes sense for Nevada to implement similar labeling requirements for irradiated cannabis. This is particularly important for medical cannabis, as many patients have medical conditions that require them to be more mindful of what they consume. Many adult use customers are also using cannabis medically, but do not want to participate in the medical program due to privacy or other concerns.

Adults who are purchasing cannabis for personal enjoyment or other non-medical reasons also deserve to know what they are consuming. The Radura symbol, developed in the Netherlands and used in over 60 countries,² is particularly suitable for Nevada's adult use market, which serves more tourists than perhaps any other regulated cannabis market in the United States.

Contrary to some claims, the Radura symbol does not tell consumers that irradiated cannabis products are dangerous or unsafe. In fact, the FDA specifically says the opposite on its webpage about food irradiation and the Radura symbol, writing:

"The FDA has evaluated the safety of irradiated food for more than 30 years and has found the process to be safe. The World Health Organization (WHO), the Centers for

¹ <https://www.fda.gov/food/buy-store-serve-safe-food/food-irradiation-what-you-need-know>

²

https://openi.nlm.nih.gov/detailedresult?img=PMC5302430_foods-05-00079-g001&query=&it=xg&req=4&simResults=PMC4586928_enu0031500790007

Disease Control and Prevention (CDC) and the U.S. Department of Agriculture (USDA) have also endorsed the safety of irradiated food.”

Despite the FDA’s endorsement of the safety of irradiated food, it still requires the Radura symbol be used so that consumers can make educated purchasing decisions. This transparency and public education is even more important for the cannabis industry as it is for the food industry. Therefore, we respectfully request that you keep NCCR 12.065 as adopted.

Thank you again for your consideration. Please do not hesitate to contact us if you have any questions or would like additional information.

A handwritten signature in black ink that reads "Jill Ellsworth". The signature is written in a cursive, flowing style.

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