



STATE OF HAWAII  
DEPARTMENT OF HEALTH  
P. O. Box 3378  
Honolulu, HI 96801-3378  
doh.testimony@doh.hawaii.gov

**Testimony COMMENTING on S.B. 2659, SD1  
RELATING TO MEDICAL CANNABIS PRODUCTS**

REPRESENTATIVE JOHN M. MIZUNO, CHAIR  
HOUSE COMMITTEE ON HEALTH & HUMAN SERVICES

Hearing Date: Wednesday, March 14, 2018      Room Number: 329

1    **Fiscal Implications:** None known or anticipated.

2    **Department Testimony:** Thank you for the opportunity to provide COMMENTS on this bill.

3            The Department has no concern on amending the term “transdermal patch” to  
4    “transdermal device.”

5            Regarding adding suppositories as an authorized product, the Department could not find  
6    articles in the medical literature on tetrahydrocannabinol (THC) or cannabinoid suppositories.  
7    As a result, it would appear there is insufficient experience with this delivery system to know  
8    whether it is safe or to opine on a safe dose. The Department acknowledges that adding  
9    suppositories as an allowed products came from the Medical Cannabis Legislative Oversight  
10   Working Group and that the Department was represented on the Working Group. Nevertheless,  
11   the Department respectfully requests this Committee omit suppositories from the list of allowed  
12   cannabis products until its medical basis can be determined. Instead, the Department could  
13   accept proposals from physicians, registered patients, or dispensaries to add this or other  
14   products to the list of authorized products. This administrative process would include literature  
15   searches to help determine the medical bases for the products. The process would be added to  
16   the interim administrative rules and would follow a similar process used by the Medical

- 1 Cannabis Patient Registry Program for adding new debilitating medical conditions. The
- 2 Department would add the process into the rules by June 30, 2018.
- 3 Thank you for the opportunity to COMMENT on this bill.

# HAWAII EDUCATIONAL ASSOCIATION FOR LICENSED THERAPEUTIC HEALTHCARE

To: Representative John Mizuno, Chair Health and Human Services (HHS)  
Representative Bertrand Kobayashi, Vice-Chair HHS  
Members of the House HHS Committee

Fr: Blake Oshiro, Esq. on behalf of the HEALTH Assn.

Re: Testimony **In Support** on **Senate Bill (SB) 2659, Senate Draft (SD) 1**  
RELATING TO MEDICAL CANNABIS PRODUCTS- Updates transdermal patches to transdermal  
devices in section 329D-10, HRS, thereby including non-patch devices that deliver through the  
dermis. Adds cannabinoid suppositories to the list of cannabis products that may be  
manufactured and distributed by dispensaries.

Dear Chair Mizuno, Vice-Chair Kobayashi, and Members of the Committee:

HEALTH is the trade association made up of the eight (8) licensed medical cannabis  
dispensaries under Haw. Rev. Stat. (HRS) Chapter 329D. We **support SB2659, SD1**  
which would expand the list of approved products to include transdermal patches and  
devices and suppositories.

The Act 230 working group, established by the 2016 legislature, found that inclusion of  
these products would be beneficial to patients.

First, the Act 230 working group found that non-inclusion of transdermal patches and  
devices in the initial Act 241 list from the laws creation in 2015 was unintentional. There  
are also studies to support this method of delivery.

- For recent developments in transdermal delivery mechanisms  
including chemical penetration enhancers, physical permeabilization  
(sonophoresis, iontophoresis and microneedles) and novel nanocarriers. See:  
1) Zhang H. et. al. Breaking the skin barrier: achievements and future  
directions. [Curr Pharm Des.](#) 2015;21(20):2713-  
24. <https://www.ncbi.nlm.nih.gov/pubmed/25925124> 2) Prausnitz MR, Langer  
R. Transdermal drug delivery. *Nature biotechnology.* 2008;26(11):1261-1268.  
doi:10.1038/nbt.1504. [https://www.ncbi.nlm.nih.gov/pmc/articles/PMC270078  
5/](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2700785/)

Second, cannabinoid suppositories, like transdermal devices, can be an advantageous  
form of drug administration because it avoids the first-pass metabolic effects of oral  
ingestion and can ensure stable blood levels of the administered drug over long periods  
of time, which can reduce side effects. Suppository administration is a favorable option  
for patients who have difficulty with oral administration.

§ See Oregon section 333-007-0200 for Definition: "*Cannabinoid  
suppository*" means a small soluble container designed to melt at body  
temperature within a body cavity other than the mouth, especially the rectum  
or vagina, containing a cannabinoid product, concentrate or extract.

§ Suppositories bypass the first-pass effect and led to sustained elevation of drug plasma levels. Higher, more sustained plasma drug levels should enhance antiemetic efficacy ([Mattes RD et. al1993](#)). ([Larry A. Walker et. al. 1999](#))Administration of the THC-HS via suppositories resulted in excellent bioavailability, sustained plasma levels of THC, and improved efficacy as compared to the oral formulations.

Thank you for your consideration.

**SB-2659-SD-1**

Submitted on: 3/12/2018 11:17:38 PM

Testimony for HHS on 3/14/2018 8:40:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Carl Bergquist	Drug Policy Forum of Hawaii	Support	Yes

Comments:

**SB-2659-SD-1**

Submitted on: 3/13/2018 8:27:51 AM

Testimony for HHS on 3/14/2018 8:40:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Melodie Aduja	OCC Legislative Priorities Committee, Democratic Party of Hawai'i	Support	No

Comments: