

# SB2659

**Measure Title:** RELATING TO MEDICAL CANNABIS PRODUCTS.

**Report Title:** Medical Cannabis; Manufactured Cannabis Products;  
Transdermal Devices; Suppositories

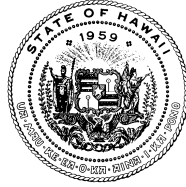
**Description:** Updates transdermal patches to transdermal devices in section 329D-10, HRS, thereby including non-patch devices that deliver through the dermis. Adds cannabinoid suppositories to the list of cannabis products that may be manufactured and distributed by dispensaries.

**Companion:**

**Package:** None

**Current Referral:** CPH

**Introducer(s):** BAKER, ENGLISH, ESPERO, GALUTERIA, KIM, RUDERMAN, Gabbard, Ihara, Nishihara



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  
RELATING TO MEDICAL CANNABIS PRODUCTS**

SENATOR ROSALYN H. BAKER, CHAIR  
SENATE COMMITTEE ON COMMERCE, CONSUMER PROTECTION, AND HEALTH  
Hearing Date: Tuesday, February 13, 2018 Room Number: 229

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.

**SB-2659**

Submitted on: 2/12/2018 3:49:45 AM

Testimony for CPH on 2/13/2018 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Melodie Aduja	OCC Legislative Priorities	Support	No

Comments:

**SB-2659**

Submitted on: 2/11/2018 1:56:15 AM

Testimony for CPH on 2/13/2018 9:00:00 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:

## HAWAII EDUCATIONAL ASSOCIATION FOR LICENSED THERAPEUTIC HEALTHCARE

To: Senator Rosalyn Baker, Chair Consumer Protection and Health (CPH)  
Senator Jill Tokua, Vice-Chair CPH  
Members of the Senate Committee

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

Re: **Testimony In Support on Senate Bill (SB) 2659**

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 Baker, Vice-Chair Tokuda, 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** 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/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. al 1993](#)). ([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**

Submitted on: 2/13/2018 7:28:28 AM

Testimony for CPH on 2/13/2018 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Miles W. Tuttle	Kine Bottles	Support	No

Comments:



**SB-2659**

Submitted on: 2/10/2018 8:04:37 PM

Testimony for CPH on 2/13/2018 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Joseph A. Bobich		Support	No

Comments:

Dr. Myron Berney

## SUPPORT SB 2659

### SB 2659

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.

**SUPPORT - these additions will help patients who have issues with oral ingestion.**

**insures that transdermal devices as well as patches and cannabinoid suppositories can be manufactured and sold in Hawaii.**

Thank you in advance for your consideration of these bills and amendments

**SB-2659**

Submitted on: 2/12/2018 7:35:18 AM

Testimony for CPH on 2/13/2018 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Marilyn Mick		Support	No

Comments:

these additions will help patients who have issues with oral ingestion.