

**Stephen Hoffman**

**From:** IRRC  
**Sent:** Thursday, June 30, 2022 2:27 PM  
**To:** Michelle Elliott; Scott Schalles; Fiona Cormack  
**Cc:** Stephen Hoffman  
**Subject:** FW: Statute 35 P.S. Heath and Safety 10231.303(b)(8)  
**Attachments:** Sativa vs Indica Misconception - An Interview with Dr Ethan Russo.pdf; Sativa vs Indica Misconception - An Interview with Dr Ethan Russo.pdf

Comment on #3290, Medical Marijuana.

*Kathy Cooper*  
Independent Regulatory Review Commission  
333 Market Street Tower  
14<sup>th</sup> Floor  
Harrisburg, PA 17101  
717-783-5417

---

**From:** Dr. Jennifer Minkovich <admin@mmjadvocatedoc.com>  
**Sent:** Thursday, June 30, 2022 2:17 PM  
**To:** IRRC <irrc@irrc.state.pa.us>  
**Subject:** Statute 35 P.S. Heath and Safety 10231.303(b)(8)

**CAUTION: \*\*EXTERNAL SENDER\*\*** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

June 30, 2022

Dear IRRC Board,

Thank you for allowing me to submit a comment.

I am writing to comment on statute 35 P.S. 10231.303(b)(8), which states that Medical Marijuana "products packaged by a grower/processor or sold by a dispensary shall only be identified by the name of the grower/processor, the name of the dispensary, the form and *species* of medical marijuana, the percentage of tetrahydrocannabinol and cannabinol contained in the product and any other labeling required by the department."

1. The mandate to include on the label the "species" of the plant (or plant-derived product) is now problematic, and moot, since recent research has shown that the cannabis plant is of one single species - *Cannabis sativa* - and the previously used differentiation of the cannabis species into indica, sativa, ruderalis, or "hybrid" etc. are no longer widely accepted in the scientific community. Researchers have shown over the past decade that describing a plant's morphology using those differentiators, cannot be used to predict a clinical outcome in a patient using said product. To put it plainly, "an indica" does not lead to "sedation" and a "sativa" does not lead to an "energizing effect." This common belief in the cannabis community has been debunked. (See attached article.)

Therefore, I encourage the removal of the word "species" from the above statute, and I encourage the operators (grower-processors and dispensary organizations) to stop using the terms "sativa" and "indica" on packaging, as they are misleading to patients.

I can provide additional research on this topic if needed.

2. The cannabinoids and terpenes are the naturally-occurring plant compounds found in the cannabis plant that bind to and interact with the receptors in our body to produce a clinical effect. Therefore, if we want to be able to accurately predict what the effects of a particular cannabis plant or product are going to be in the human body, we need to look at the cannabinoid and terpene profiles of that plant or product. It is important that the full cannabinoid and terpene profile be on the label of every cannabis product sold, so that patients can make an informed decision.

My best regards,  
Dr Jennifer Minkovich

**Jennifer Minkovich, DO**

**Medical Cannabis Physician**  
**Founder - MMJ Advocate Doc**  
[www.mmjadvocatedoc.com](http://www.mmjadvocatedoc.com)

Board-Certified Family Medicine Physician

Physician Member - Society of Cannabis Clinicians

Healer.com Certified Physician