



Colorado Child & Adolescent Psychiatric Society

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RE: HB21-1317 "Tangible Educational Resources"

Marijuana Enforcement Division Members:

HB21-1317 "Regulating Marijuana Concentrates" requires the state licensing authority to produce a "tangible educational resource" regarding the use of regulated marijuana concentrate. Section 44-10-202 (8) further instructs this tangible educational resource shall include risks and precautions. We appreciate and support the inclusion of cannabis hyperemesis syndrome, cannabis use disorder, and other listed risks and precautions. However, they should not be categorized as occurring only in those with previous psychiatric history and other risk factors as cannabis use disorder most commonly occurs in individuals with no previous psychiatric history.¹ Similarly, cannabinoid hyperemesis syndrome is currently understood to be a physiologic response to chronic cannabis use that is independent of mental health.² Additional known risks of high-potency cannabis use include **cannabis-induced psychosis** and **suicide attempt or self-harm**.³ In the most current draft of the tangible educational resource provided by MED for review, cannabis-induced psychosis is listed as a risk only for those with previous psychiatric conditions, which is not accurate, and suicide attempt is excluded.

As it reads, the resource embeds the risk of psychosis only in individuals with psychiatric history and with "other risk factors." This is not an accurate representation of what we know about the risk. Cannabis-induced psychosis can occur in individuals with no known psychiatric history, no known family history of psychosis, and no previous psychotic episodes. We are also concerned that the wording "psychotic symptoms and/or psychotic disorder" appears to minimize or soften the language, which is ineffective when conveying risk to consumers and patients. Cannabis-induced psychosis is a recognized medical condition attributed to cannabis use. While considered rare, chronic and treatment-refractory cases of cannabis-induced psychosis have occurred in Coloradans, primarily under the age of 25 years-old. Given the seriousness of this potential risk, a bold, direct statement is ethically required. For psychosis, we propose the following: **WARNING: Risk of cannabis-induced psychosis and/or psychotic symptoms. This can occur in individuals with no previous history of psychosis.**

CDPHE materials do not limit risk of psychosis to only individuals with previous psychiatric or family history. In the 2020 report from CDPHE titled *THC Concentration in Colorado Marijuana: Health Effects and Public Health Concerns*, CDPHE makes the following stand-alone statement regarding psychosis: "We found MODERATE evidence that individuals who use marijuana with THC concentration >10% are more likely than non-users to be diagnosed with a psychotic disorder, such as schizophrenia."⁴ Later, in summary of the evidence reviewed, CDPHE writes, "Current literature shows that adults who use

¹ See <https://www.mdpi.com/2077-0383/10/1/15>.

² See <https://link.springer.com/article/10.1007%2Fs13181-016-0595-z>.

³ See <https://jamanetwork.com/journals/jamapsychiatry/fullarticle/2723657>

⁴ See <https://www.thenmi.org/wp-content/uploads/2020/08/THC-Concentration-in-Colorado-Marijuana-CDPHE-8.3.2020.pdf>



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marijuana classified as containing high concentrations of THC (>10% THC) are more likely than non-marijuana-users to be diagnosed with a psychotic disorder, such as schizophrenia. In a 2015 study by Di Forti et al., individuals who reported using marijuana products with higher THC concentration (average 12.9% THC) had greater odds of developing first episode psychosis compared to those who never use marijuana products.” These statements do not contain the qualification that they only apply to individuals with previous psychiatric or family history.

In the previous drafts of the tangible education resource, risk of suicide attempt was also listed. However, in the current draft, this risk has been removed. Research studies consistently show that an active substance use disorder, including cannabis use disorder, increases the odds of attempting suicide among adolescents and adults. As with cannabis-induced psychosis, risk of suicide can exist in individuals with no previous psychiatric history and no family psychiatric history. We propose adding the following: **WARNING: Risk of suicide attempt or self-injurious behavior.**

The current MED draft of risks and precautions mischaracterizes some of the statements as only applicable to individuals with psychiatric history or other risk factors and excludes suicide attempts. Coloradans want to make educated decisions regarding their healthcare and recreational behaviors and MED should make every effort to support Coloradans’ ability to do so by presenting accurate educational resources. We recommend the tangible educational resource read:

WARNING: Marijuana Concentrate may cause:

1. **Cannabis-induced psychosis and/or psychotic symptoms.** This can occur in individuals with no previous history of psychosis.
2. Mental Health Symptoms/Problems.
3. Cannabis hyperemesis syndrome (CHS).
4. Cannabis use disorder.
5. **Suicide attempt or self-injurious behavior.**

Thank you,

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