

## **Important Notice: Potential Legal/Compliance Issues for Exhibiting CBD Products at 2022 Global Pet Expo**

**Dear APPA Members,**

The law regarding CBD products is extremely unsettled, and possible enforcement by federal or Florida authorities at Global Pet Expo even more difficult to predict. Due to such legal uncertainty, it is APPA's policy that any exhibitors at the 2022 Global Pet Expo bring and display only the packaging of any CBD product and not the actual product, unless the product and packaging strictly comply with the specific requirements of the Florida Hemp Statute (see below).

While limiting exhibiting and display to just packaging might seem drastic, such caution is necessary in light of such an evolving legal and enforcement landscape. Without straightforward federal and state guidelines for now, any exhibitors who choose to exhibit CBD products – and not just the packaging – will do so at their own risk.

For your information we wanted to make you aware of two regulatory requirements that might apply to your business:

### **FDA Requirements**

The FDA does not recognize CBD as a safe food additive and therefore it is not allowed as an ingredient for ingestion in pet food. Also the FDA has been aggressive with Warning Letters when companies market products containing CBD with drug claims. They continue to exercise general enforcement discretion, however, when no such claims are made.

Florida's Hemp Statute (Fla. Stat. 581.217, (effective July 1, 2019)

Florida's rule on hemp products sold or distributed in the state requires:

- 1) that products containing hemp extracts be accompanied by a certificate of analysis (COA) from an independent lab declaring that the batch contained a total delta-9-tetrahydrocannabinol (THC) concentration that did not exceed 0.3 percent on a dry-weight basis, and that the batch does not contain contaminants unsafe for human consumption; and
- 2) the product be labeled with a scannable barcode linked to the COA, batch numbers, an internet address where batch information can be obtained, expiration dating, number of milligrams of hemp extract, and a statement that the THC content does not exceed .3 percent.

Do not hesitate to contact us if you have any further questions.

Thank you.  
The APPA Legal Department