



Connecticut Marijuana Abuse Prevention Alliance
Medical Marijuana Task Force

Dedicated to the Safe and Appropriate Use of Medical Marijuana in Connecticut

Proposed regulations on marketing practices and should be strengthened to avoid youth friendly messages and placements.

Sec. 21a-408-66(b) of the Regulations of Connecticut State Agencies states:

An advertisement for marijuana or any marijuana product shall not contain:

5) Any statement, design representation, picture or illustration that encourages or represents the recreational use of marijuana;

(6) Any statement, design, representation, picture or illustration related to the safety or efficacy of marijuana unless supported by substantial evidence or substantial clinical data.

(7) any statement, design, representation or illustration portraying anyone under the age of 18, objects suggestive of the presence of anyone under the age of 18, or contains the use of a figure, symbol or language that is customarily associated with anyone under the age of 18;

Summary statement on Advertising/Marketing:

The Connecticut Marijuana Abuse Prevention Alliance is gravely concerned with the potential for advertisements in the state that either appeal to youth who will continue to not be allowed to access marijuana or cross the line between supposed medicinal use and recreational use. People in addiction treatment programs are six times more likely to be in treatment for marijuana addiction than all other **illegal substances combined**. The majority of those in addiction treatment for marijuana began using marijuana as a teen or younger. CT should not allow widespread, regulated "after-the-fact" advertising of an addictive drug that already costs society too much and already has great appeal to youth.

Therefore, CT MAPA requests that the DCP adopt the 45-day review period originally envisioned in the January 2013 Draft Regulations Sec. 21a-408-66 (c) & (d) to ensure that all advertisements meet strict standards related to Sec.21a-408-66 (b) *prior to the advertisements dissemination*. Once these advertisements "hit the streets" if they do not meet the standards outlined in Sec.21a-408-66 (b), the damage from these advertisements will already be done.

In addition, CT MAPA respectfully requests that the DCP create a review panel for these advertisements in the 45-day review period that include Public Health, Addiction and Youth Advertising experts.

Experience from "Big Tobacco" and the Alcohol Industry, as well as some of their own documents that have been publicly released in the past several years, demonstrates their knowledge of the importance of the youth market to the long-term profitability of their products. These industries have shamelessly targeted youth and even specific demographics among youth to "hook" youth on their products and brands to ensure long term market share and profitability. The Center for Alcohol Marketing and Youth has conducted defining research of the alcohol industry in this area. It is incumbent upon the State of Connecticut to ensure these national failures to protect our youth are not continued here in our state with marijuana. Instituting a 45-day review period for all marijuana advertisements and having a qualified review panel that includes Public Health, Addiction and Youth Advertising experts that applies strict standards of adherence to Sec.21a-408-66 (b) is an important step Connecticut must take to protect our youth from the harms of marijuana.