May 19, 2025

Re: Support for Senate Engrossed version of SB 3 (Full Retail THC Ban)

Honorable Texas Legislators,

The Texas Medical Association (TMA), Texas Pediatric Society (TPS), Texas Nurses Association (TNA), and Texas Hospital Association support restoring Senate Bill 3 to the Senate engrossed version which bans retail THC. This legislation takes essential steps to advance public health protections for all Texans.

Addressing THC Risks

It is important to note that the state and federal 0.3% THC limit was set to legally differentiate hemp from marijuana and was not informed by medical research.[1,2,3] Some consumable hemp products, such as edibles, beverages, and oils, pose significant health risks because many have been found to contain unsafe levels of contaminants, including heavy metals like lead, arsenic, and mercury, as well as pesticides and microbial toxins.[4,5]

THC beverages are becoming increasingly popular among young adults aged 18-34.[6] Research indicates that frequent cannabis users tend to drink more alcohol, leading to greater impairment, higher consumption, and increased health risks. While THC and alcohol consumed alone can cause cognitive impairment, combining them – either in a single beverage or through separate consumption – leads to amplified effects and heightened safety concerns. This interaction magnifies the loss of coordination, delayed reaction times, weakened concentration, and altered judgment.[7] Texas physicians and nurses are already witnessing firsthand the risks of these products, including increased mental health conditions and substance use disorders.

The Senate engrossed version of SB 3 directly addresses these concerns by requiring mandatory licensing and registration for hemp processors, manufacturers, and retailers. The bill also restricts the manufacture and sale of consumable hemp products containing cannabinoids, except for cannabidiol (CBD) or cannabigerol (CBG), effectively prohibiting psychoactive THC products.

Safeguarding our Youth

A critical provision of the senate engrossed version is setting 21 as the minimum age to purchase CBD and CBG products, aligning with established precautions for youth protection. Many of these products come in sweet flavors and forms like gummies, candy, chocolate, or baked goods, often packaged in brightly colored, appealing, and easy-to-open containers that children can access and accidentally ingest.[8]

Young children are particularly vulnerable to unintentional consumption, which can result in severe neurological and respiratory effects. In 2024, the Texas Poison Center Network reported 544 cases of THC exposure among children under age 5.[9] THC poisoning in children can linger for hours, with more severe cases requiring ICU admission for close monitoring, increasing hospital costs.[10]

THC use, particularly among youth, is associated with an increased risk of psychosis, suicide attempts, and self-harm, with risks heightened in individuals with co-occurring mental health conditions such as depression.[11,12] Our focus is not only to protect Texas youth from acute harm and poisoning but also to safeguard them from a lifetime of dependency and potential mental health conditions. We strongly support the bill's provisions: requiring tamper-evident, child-resistant packaging; prohibiting marketing to minors (e.g., cartoon figures or child-appealing imagery); and restricting the sale of CBD and CBG products within 1,000 feet of schools. Our organizations greatly appreciate the focus on protecting youth from the risks of these products.

Assessing Safety and Health Risks

We advocate for the safety of CBD and CBG products and comprehensive testing for cannabinoids and harmful contaminants before products reach consumers. Furthermore, we support requiring test results to be made available to sellers and consumers, increasing transparency and accountability in the marketplace.

We must prioritize public safety and health when considering THC policies, given the wide range of negative health effects associated with their use.[13] Short-term risks include altered perception, anxiety, panic, hallucinations (particularly with high THC doses), and impaired coordination and reaction times, which increase the risk of motor vehicle accidents.[14] Long-term effects are equally concerning, including addiction (cannabis use disorder), mental health issues such as psychosis, and cognitive impairments, especially in adolescents. Notably, hospital and emergency department patients diagnosed with cannabis use disorder experience a threefold higher mortality rate within 5 years, underscoring the serious health consequences of chronic use.[15]

Additionally, cannabis users aged 45 and older with emergency room visits or hospitalizations were 23% more likely to be diagnosed with dementia within five years compared to patients with other acute care visits, and 72% more likely than the general population.[16] Frequent users are also at risk of developing cannabinoid hyperemesis syndrome, characterized by recurring nausea, vomiting, and stomach pain. Smoking cannabis can damage lung tissue, leading to scarring and harm to blood vessels, while chronic use may cause an immediate increase in heart rate and blood pressure, elevating the risk of stroke, heart disease, and other vascular conditions. [17,18,19,20,21]

Maintaining Compassionate Use Access

We appreciate the commitment to preserving the Texas Compassionate Use Program under Chapter 487, ensuring that patients with medical needs retain access to highly regulated therapeutic options. We remain steadfast in supporting evidence-based medical care for patients and oppose punitive measures or criminalization of possession, particularly for minors. Instead, we advocate for addressing the underlying causes of substance use disorders and mental health challenges.

Self-medicating with THC products can be risky, especially without medical supervision. While some users may experience short-term relief, these benefits can be outweighed by long-term negative effects such as cognitive impairment, cardiovascular issues, and increased infection risk. Additionally, THC can interfere with the metabolism of many prescription drugs, causing their levels to rise and increasing the chance of harmful side effects. For example, THC can elevate the levels of certain antidepressants like SSRIs, increasing the risk of side effects such as dizziness, fatigue, and gastrointestinal issues. Other potential interactions include enhanced sedation when combined with similar medications, reduced effectiveness of blood thinners and antiplatelet drugs (increasing the risk of bleeding), and impacts on blood pressure regulation, particularly concerning for older adults and those with heart conditions. Careful medical guidance is essential to balance these risks with any therapeutic benefits.[22,23]

We must protect Texas youth from both immediate and long-term harm, safeguarding them from dependency and mental health challenges. Thank you again for this opportunity to support stronger regulations on these products.

For questions, please contact Matt Dowling at matt.dowling@texmed.org, Clayton Travis at clayton.travis@txpeds.org, or Jack Frazee at jfrazee@texasnurses.org. (Please see the electronic version of this letter for a full list of sources.)

Sincerely,

G. Ray Callas, MD, President, Texas Medical Association

Valerie B. Smith, MD, MPH, FAAP, President, Texas Pediatric Society

Serena Bumpus, DNP, RN, NEA-BC, CEO, Texas Nurses Association

John Hawkins, President and CEO, Texas Hospital Association

[1] www.cdc.gov/cannabis/about/index.html
[2] www.cdc.gov/cannabis/faq/
[3] https://jamanetwork.com/journals/jama/article-abstract/2702003
[4] http://ehp.niehs.nih.gov/doi/10.1289/EHP5785
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