



Comment from Randell Stroud

The is a Comment on the **Food and Drug Administration (FDA) Notice: International Drug Scheduling; Convention on Psychotropic Substances; Single Convention on Narcotic Drugs; Ocfentanil, Carfentanil, Pregabalin, Tramadol, Cannabidiol, Ketamine, and Eleven Other Substances; Request for Comments**

For related information, [Open Docket Folder](#)

[Comment Now!](#)

Due Sep 13 2017, at 11:59 PM ET

ID: FDA-2017-N-4515-0291

Tracking Number: 1k1-8y3x-1rgt

Document Information

Date Posted:

Aug 17, 2017

[Show More Details](#)

Submitter Information

Country:

United States

State or Province:

TN

Submitter's Representative:

Randell Stroud

Category:

International Organization - I0032

Comment

I have been involved in combat sports since I was a child; boxing, wushu, wrestling, ect. I am now aged 30 years. During the 30 year course of my life, I have sustained many injuries as a result. Dislocated shoulder, Tennis elbow, Hip impingement, overall joint pain, and various other chronic pain related ailments. This chronic pain has also contributed to problems with anxiety that are greatly induced when I travel away from home. Recently I have been experimenting with CBD products at varying dosages. At 60mg, I noticed that my mood is slightly enhanced, my pain threshold is noticeably increased, and an overall sense of calmness overtakes my body my mind. The effects were mild but still noticeable. I have also tested my blood pressure while inhaling the vapor of CBD (as well as ingesting it at 60mg dosages. I noticed that my blood pressure was marginally lowered, thus inconclusive on its benefit. Although CBD products are costly, I decided to invest in a 250mg dosage. The dosages were used three times per day for 3 weeks. I used 3-6 drops under the tongue and on some days used vaporization via inhalation.

At this dosage, I noticed a significant reduction in joint pain, a significant decrease in depression, and a gentle sense of increased dopamine levels as if my brain had witnessed something joyful. Dosages placed under the tongue had a slower effect but lasted longer once effects took place. (Approximately 2-4 hours of relief). When administered through inhalation from vaporization methods, effects took place within 1-3 minutes yet effects also diminished faster. (1-3 hours). However, after continued use (approximately 5 days), joint pain was consistently reduced, even on days where dosage was administered at a lesser rate. Although the relief was minimal at lower dosages (60mg and lower), the reduction in pain and anxiety were at least "noticeable". Due to the high cost of quality CBD products, I have not yet experimented with sustained dosing lasting longer than 3 weeks.

Upon further research, I have discovered that THC and CBD actually work together in synergy to target pain, inflammation, serotonin, and dopamine receptors. Most cannabis users purchase strains that are high in THC (The psychoactive compound) in order to experience "euphoria" and altered states of consciousness. However, many growers are now producing strains such as "Charlotte's Web" (which contains less than 3% THC) and "Harlequin", containing an equal

amount of CBD and THC. Strains that contain no THC , such as "Charlotte's Web" , are extremely beneficially for those who wish to experience relief from pain, seizures, or mental health disorders without experiencing the intoxicating effects of THC. Strands like, "Harlequin" , contain about 13% CBD and between 6-10% THC. Strands such as these work together with THC to relieve nausea, depression, and have a stronger impact on reduction of chronic pain without experiencing an overwhelming "buzz" or "high" that is experienced with popular high THC strains regularly used by "stereotypical users" (i.e. Party goers, teenagers, ect..)

While many proponents have strong arguments around regulating high THC strains of Marijuana, there should be no debate around the legality or the unnecessary need of regulation regarding "Hemp" (cannabis related plant with virtually no THC, high in CBD), or Marijuana strains that contain low or trace amounts of THC. CBD products and plants containing CBD are safe and non intoxicating. Many studies suggest that strains of Marijuana such as "Harlequin" containing high amounts of CBD actually counteract the intoxicating effects of THC or at least dampen its effects. My recommendation to the Federal or state governments are very realistic. Do not target cannabis plants themselves but rather particular strains and/or its THC content. Think of alcohol regulations. Wine coolers, beer, liquor, wine, all contains differing amounts of alcohol percentages whereas all are regulated slightly different. A single beer at 5% alcohol is much easier to tolerate than a standard shot of a liquor containing up to 40% alcohol. Many states do not allow for the sell of alcoholic products containing more than 13% alcohol after a certain time of day, (typically 11pm).

If alcohol, which contains virtually no health benefits, can be regulated and controlled in order to curb its dangerous intoxicating effects, then why should marijuana not receive the same treatment, specifically CBD or derivatives of plants containing CBD? Aside from the Alcohol vs Marijuana debate, CBD and plants containing CBD with virtually no THC content, deserve to be largely left alone. In conclusion, CBD products are completely safe and should be treated as any other dietary supplement such as how a box of Vitamin C tablets or a multi-vitamin would be sold in a store.

As the owner of Nalini-Global, I can personally attest to the need of CBD in terms of human rights, health and research development.