



**Office of Cannabis Regulation**  
Department of Licensing and Consumer Affairs  
Government of the Virgin Islands of the United States  
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**September 1, 2025**

Honorable Clifford A. Joseph, Sr.  
Chairman, Committee on Homeland Security, Justice and Public Safety  
36th Legislature of the Virgin Islands

Dear Senator Joseph:

Thank you for your letter dated August 21, 2025, inviting Ms. Joanne Moorehead, Executive Director of the Office of Cannabis Regulation (OCR), to provide testimony on Bill No. 36-0105 at the scheduled hearing on September 4, 2025.

Please be advised that I am currently out of the territory on work-related business, as indicated in my email dated August 25, 2025, and am therefore unable to appear at the hearing.

Nonetheless, the OCR wishes to express its full support for the development and enforcement of stronger regulations governing cannabis and hemp-derived products, particularly those posing public health risks. The OCR endorses the inclusion of age-gating protocols, rigorous testing requirements, and clearly defined product safety and labeling standards. These safeguards are essential to protect consumers and ensure that products marketed in the Virgin Islands adhere to best practices and are compliant with both local law and public health objectives.

That said, we respectfully raise two important concerns with the current draft of Bill No. 36-0105. First, while the bill seeks to prohibit the possession, sale, and manufacture of intoxicating hemp-derived cannabinoids such as THC-A, delta-6 THC, delta-8 THC, and delta-10 THC, it does not designate a specific agency responsible for enforcement. Without clearly defined regulatory oversight, compliance and implementation efforts could be fragmented or ineffective.

Second, the bill risks overlapping with existing provisions under the Virgin Islands Cannabis Use Act (Act No. 8680), which regulates the legal cannabis market. Specifically, some of the cannabinoids listed for prohibition under Bill No. 36-0105, including THC-A, may also be present in products authorized for sale within the regulated cannabis framework. Without more precise statutory language distinguishing between naturally occurring cannabinoids permitted under the Cannabis Use Act and synthetically altered or unsafe variants, there is potential for legal ambiguity and disruption in the emerging legal cannabis industry.

While I am disappointed that I am unable to attend this hearing to provide in-person testimony, the OCR remains committed to working with the Legislature to develop a well-regulated, safe, and effective cannabis and hemp marketplace.

We appreciate your leadership and look forward to ongoing collaboration.

Sincerely,  
Joanne Moorehead  
Executive Director

