

June 8, 2026

The Honorable Aisha Wahab, Chair
Senate Committee on Business, Professions and Economic Development
1021 O Street, Suite 7630
Sacramento, CA 95814

Re: Oppose AB 1990, unless amended (Gipson)

Dear Chair Wahab and Members of the Committee:

On behalf of the Alliance for Pharmacy Compounding (APC), representing more than 600 compounding pharmacies and 7,500 compounding professionals nationwide, we respectfully urge the Committee to amend AB 1990.

APC supports efforts to stop misleading advertising and protect California patients. However, AB 1990 is fundamentally flawed because it does not effectively regulate many of the entities responsible for the advertising practices cited as justification for the bill. Instead, it imposes sweeping new restrictions on licensed pharmacies that are already among the most heavily regulated healthcare providers in the state.

In short, AB 1990 targets the wrong actors.

Advertisements repeatedly highlighted by proponents are often created and disseminated by telehealth companies, lead-generation platforms, wellness businesses, and marketing firms that fall outside the California Board of Pharmacy's jurisdiction. Yet the bill relies primarily on Board of Pharmacy enforcement. As a result, many of the entities responsible for the conduct that prompted this legislation would remain largely untouched, while licensed pharmacies bear the burden of compliance.

This is not a minor drafting issue—it is the central flaw in the bill.

AB 1990 creates substantial new requirements related to advertising, disclosures, ingredient sourcing, testing, and documentation without demonstrating that these mandates will improve patient safety. At the same time, those requirements threaten to reduce patient access to compounded medications that physicians prescribe when commercially available products cannot meet a patient's needs.

Further, the bill effectively bans compounded GLP-1's by requiring that all compounded GLP-1 API be manufactured in the same process as FDA approved product bulk drug substances, even though FDA does not make such a distinction. Moreover, compounders do not have access to GLP-1 API

that is produced using the same process as the FDA-approved product. It also requires an FDA-registered manufacturing facility to be inspected every two years to lawfully manufacture bulk drug substances despite the requirement that the FDA conduct risk-based inspections that do not occur on a regular cadence.

This may seem like good policy, but it directly conflicts with purpose of compounding therapies and with long established national policies set in the federal Food, Drug and Cosmetic Act.

California should not make it harder for patients to obtain medications through licensed, regulated healthcare providers while failing to address many of the entities responsible for the conduct that prompted legislative concern.

Stakeholder amendments previously submitted to the author would correct these shortcomings. Those amendments would directly address misleading advertising, establish enforceable standards that apply to the appropriate actors, prohibit inappropriate marketing practices, and preserve access to medically necessary compounded therapies.

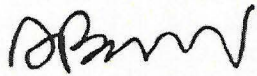
The Committee faces a straightforward choice: amend the bill so it addresses the actual problem, or advance legislation that burdens regulated pharmacies while leaving significant gaps in enforcement.

For these reasons, APC respectfully urges the Committee to adopt the stakeholder amendments.

Absent those amendments, APC must oppose AB 1990.

Thank you for your consideration.

Sincerely,



Scott Brunner, CAE
Chief Executive Officer