

**Rowshan Reordan, on behalf of Green Leaf Lab,**

**Testimony to the Measure 91 Joint Committee, April 13, 2015**

Thank you to Co-Chair Ann Lininger and Co-Chair Ginny Burdick and Co-Vice Chairs and Committee members.

I am a licensed attorney in the state of Oregon and received my bar in 2006. I have a Master's Degree in Political Science with a concentration in Human Rights.

I am the managing partner of Green Leaf Lab. Our main laboratory is located in Portland, Oregon. We have four other locations throughout the state. Green Leaf Lab has been in business since 2011. We have twelve employees, ten of them are full-time and all but three have backgrounds in chemistry and/or other science related fields.

In the course of operating Green Leaf Lab we have found some issues that we ask the committee to consider when analyzing Senate Bill 844-2 and any other proposed testing and laboratory requirements.

Please consider the following recommendations for SB 844-2:

Section 5(2)(c)(d): We recommend that the committee choose one standardization organization. We believe that the National Environmental Laboratory Accreditation (NELAC) should be the standard that Oregon follows. If the National Environmental Laboratory Accreditation Conference (NELAC) and the International Organization of Standardization (ISO) are required, we recommend that Oregon Environmental Laboratory Accreditation Program (ORELAP) be the auditing and accrediting body on behalf of both these institutions. This will allow for local control, accountability, and flexibility to reflect the needs of Oregon Liquor Control Commission (OLCC) and Oregon's cannabis testing industry.

Section 6(3)(a): If additional minimum standards for testing marijuana are required for different varieties, we recommend that the cost of such genetic testing be assessed prior to adoption of a rule to ensure that the prices do not force those that want to participate in a regulated industry back to the black market. As an alternative, Terpene analysis could be required to assess the "fingerprints" of cannabis varieties. This is a cost effective and scientifically accepted analysis.

Section 7 is confusing as it states that section 1 through 11 do not apply to OMMP card holders. However, section 7 is part of section 1 through 11. This could be interpreted to exclude the OMMP card holder exemption. We recommend moving section 7 to the end of the document and re-numbering the sections so as to allow the OMMP cardholder exemptions.

Please consider the following recommendations that were not included in SB 844-2:

We recommend that Independent Third-Party Testing be required. Requiring independent third-party testing will assist in eliminating conflict of interest issues and assist Oregon in complying with the Cole Memorandum and reinforcing policy that supports public safety.

We recommend that sampling accreditation, such as those from the National Environmental Field Activities Program (NEFAP) be required. Standardized methods for sampling can assist in eliminating excessive variation in potency test results.

We recommend a batch testing certification system. This will allow the option of laboratories to certify quantities of cannabis using a system of packaging and/or tamper proof seals. The requirement of water activity measurements before packaging/sealing can assure that the cannabis has little potential for microbial growth before the product is sealed. This batch certification system allows the product to be left in the hands of the producers, processors or retailers. This overall system can initiate the chain of custody process, assure the cannabis will be safe from microbial growth and aid in diversion control, while being cost effective.

Please feel free to contact me with further questions.

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