

To members of the Joint Committee On Implementing Measure 91,

First we would like to thank you for your time and for all of the hard work you have done to address these difficult public issues.

A summary of the following paragraphs

- I endorse the addition the alternative tier license that is used in HB 3400 Section 111, as this allows for proper cannabis breeding and tissue culture labs.
- Breeding and Tissue Culturing require high numbers of plants to be done correctly.
- The certification of seed breeders shall be held to the same requirements as a commercial grower applicant, and shall have no academic requirements since there are no accredited institutions that teach cannabis taxonomy, pollen techniques, and cannabis genetics at this time.
- All finished cannabis flowers produced in cannabis propagation facilities must be used for in house testing, donated to established research programs, sourced to allocated OMMP patient programs, composted, or be destroyed.
- At no time may any marijuana product created with plant materials from a Cannabis Propagation facility be allowed into the commercial market with the exception of the permitted seeds, clones, and immature plant starts.
- The cost of a Cannabis Propagation license shall not exceed the amount of a commercial producer's license.
- A Cannabis Propagator subcommittee should be formed to assist in the drafting of rules regarding this license.
- A plant cap may be required for "nursery" style propagation facilities since they operate slightly different than a breeding program.

The philosophy of the (Nursery) Cannabis Propagator license was to create a niche license for cannabis breeding and small laboratory clean clone tissue culture propagation. This is because breeding cannabis requires many plants, similar to what modern agricultural uses allowing for proper selection and product testing. The current commercial grower license may not allow for proper breeding since the plant count numbers have not yet been established. It is important to realize that commercial gardens work on deadlines meeting product demand, while breeding programs follow a different work flow resulting in inconsistent finished cannabis flower products. This inconsistency is due to many of the plants being different strains or phenotypes (different expressions) of the same strain, meaning each plant has a different cannabinoid profile.

I endorse and applaud the addition the alternative tier license that is used in HB 3400 Section 111, as this will ensure that cannabis breeders can work properly to create new stable varieties. A proper cannabis breeding program should be allowed to grow as many seedlings, starts, immature, and mature plants as it needs. The restrictions for this license consist of a high or unlimited plant count. A registered commercial garden shall be able to add on an endorsement for this license if desired and integrate a breeding program into their current license, with a lower registration fee as long as they follow the requirements of excess propagation material disposal. The cost of a Cannabis Propagation license shall not exceed the amount of a commercial producer's license.

The cannabis propagation license criteria in HB 3400 with the exception of the Certification of Cannabis Breeders, should work. It was brought to our attention by the OLCC after testimony, that this Breeders Certification will be treated as the same registration process that a commercial permit will require, and that is all. There are no academic courses that teach cannabis taxonomy, pollination techniques, cannabis genealogy, genetics, and epigenetics, therefore there is no criteria that quantifies any type certification at this time. This wording in HB 3400 should be removed or changed to "registration".

In regards to all finished flowers and processed materials created from a Cannabis Propagation facility, we feel it is important that they be used for either in house testing, donated to established research programs, OMMP patient programs, composted, or be destroyed. It is important that no Cannabis Propagator shall be allowed to distribute any excess materials other than seeds, clones, and immature plants, into the recreational commercial market.

Moving forward we strongly feel that it is important to create a subcommittee to deal with the issue of Cannabis Breeding and Propagation. This committee will help to develop the rules and guidelines for these permits. With the help of three to five members on a committee whom understand cannabis breeding and propagation, we can be sure that this special niche license will be created properly. If we can be of further assistance in the process the development of this program, please let us know.

Thank You,

Shane Yoakam - Cannabis Breeder / Genealogist
President of the Cannabis Genetics Preservation Society

Clancy Adams - Cannabis Breeder / Genealogist
Vice President of the Cannabis Genetics Preservation Society

Ray Bowser – Cannabis Breeder / Grower
Secretary of the Cannabis Genetics Preservation Society