Testimony on SB 1598 Geoff Sugerman Groundworks Operations

Chairs Lininger and Burdick, members of the committee:

Today, I am testifying in support of SB 1598 and in particular the -8 amendments.

Last week while testing out the Oregon Health Authority's on-line new system for registering producers and processors and tracking medical marijuana products, it became clear that the OHA feels it is bound by current law to require every grower at a premises to register and report. While the system will work well for small producers where there are two or three growers, for those facilities with numerous growers and patients this process will lead to some unintended consequences.

Because many growers are actually patients themselves and do not consistently or actively participate in the actual production of their medical marijuana, requiring them to register and report will lead to inaccurate and incomplete information being filed. I believe it will also lead to many grower/patients refusing to register, causing those grow sites to eliminate that grower and those patients from their site. This would lead to many patients not having someone to grow for them and essentially being cut off on March 1 or shortly after. It could also lead to a reduction in the supply needed for the medical marijuana market this summer and fall.

Just as we have allowed dispensary operations to designate a Person Responsible for the Facility (PRF), we should allow production sites to designate the person who is truly responsible for that site to report under the OHA tracking program. Doing so will ensure that the state truly knows who is responsible for the site, as well as being able to receive the most timely and accurate information about the products being produced at the site.

The intent of the tracking system is to know who is growing, how much they are growing are where it goes. Allowing one person to report for an entire site will lead to much greater compliance and more accurate information. We encourage the committee to adopt language that will provide us with the information we need in the most efficient way possible.

Thank you.

Geoff Sugerman