



To: Joint Committee on Marijuana Regulation

From: Deputy Chief Jeff Kuhns, Keizer Police Department
On behalf of the Oregon Association Chiefs of Police
and Oregon State Sheriffs' Association

Date: May 2nd, 2017

**RE: Support for SB 1057 with the dash-23 amendment
Adding Medical Marijuana to OLCC METRC tracking system**

Co-Chairs Burdick and Liniger, and Members of the Committee,

On April 25, 2017 I appeared before your committee prepared to provide public testimony on behalf of the Oregon Association Chiefs of Police and Oregon State Sheriffs' Association in support of SB 1057 with adoption of the dash 23 amendment. As you know, this amendment would require that medical marijuana production be tracked and accounted for as part of the OLCC METRC tracking system. When I discovered that no testimony was being considered on SB 1057, I offered testimony on the dash 7 amendment to HB 2198 and expressed our concern that this approach to the tracking of medical marijuana is inadequate to create confidence in the integrity of the program and accountability for production.

Oregon's police chiefs and sheriffs believe strongly that the State of Oregon must be adopt and implement a much stronger and more effective regulatory and enforcement system than currently exists for the OMMP. Adopting a regulatory system that tracks and traces the movement of all medical marijuana through each step of the supply chain and to trace product back to its origin must be implemented to significantly reduce the amount of marijuana leakage that is occurring within Oregon and from Oregon to other states and countries. Adding medical marijuana to the seed-to-sale Cannabis Tracking System (CTS) would create the robust controls and procedures in place to protect against the harms that are identified in the Cole memorandum. The current OMMP system, rules and regulations lack regulatory oversight, accountability and transparency. These are vulnerabilities that may result in challenges to the OMMP from the federal government that could include enforcement action and criminal prosecutions. Ultimately, this could place Oregon's Medical Marijuana Program in jeopardy of being dismantled and could severely impact medical marijuana patients.

The Oregon Association Chiefs of Police supports the tracking requirements as proposed in the SB 1057 dash 23 amendments (Section 39 through Section 43) for the following reasons:

- Requires the Oregon Health Authority to allow the Oregon Liquor Control Commission to use its Cannabis Tracking System (CTS) to track all medical marijuana production at marijuana grow sites other than marijuana grow sites located at an address where a registry identification cardholder produces marijuana and no more than 12 mature plants and 24 immature plants are produced at this address.
- Requires tracking of the processing of medical marijuana into medical cannabinoid products, cannabinoid concentrates and cannabinoid extracts that are transferred to a medical marijuana dispensary;
- Requires tracking of the transfer of useable marijuana, immature marijuana plants, medical cannabinoid products, cannabinoid concentrates and cannabinoid extracts by a marijuana grow site or a medical marijuana dispensary to a registry identification cardholder or the designated primary caregiver or a registry identification cardholder; and
- Requires tracking of the transfer of useable marijuana, immature marijuana plants, medical cannabinoid products, cannabinoid concentrates and cannabinoid extracts between marijuana grow sites, marijuana processing sites and medical marijuana dispensaries; and
- Requires tracking of Marijuana grow sites, marijuana processing sites, medical marijuana dispensaries and any other person that processes marijuana into medical cannabinoid products and cannabinoid concentrates for the purpose of transferring the medical cannabinoid products and cannabinoid concentrates to a medical marijuana dispensary.
- Authorizes the Oregon Liquor Control Commission to conduct inspections and investigations of alleged violations.
- Provides revenue from the Oregon Marijuana Account for the purpose of paying for the administrative, inspection and investigators costs incurred by the commission.

We support adoption of the dash-23 amendment to SB 1057 because it tracks all marijuana production and movement of product throughout the supply chain and includes all medical marijuana grow sites, medical marijuana processing sites and medical marijuana dispensaries within the system. We believe this comprehensive approach will best protect the needs of medical marijuana cardholders, will increase confidence in the integrity of the OMMP and will reduce the ability for criminal actors to operate within the system.

Thank you for your consideration.