

Representative McLain,

Thank you very much for taking the time to meet with us last week to listen to our concerns about Industrial Hemp rules and its future direction.

We spent several hours reviewing the current draft of HB4089 and have outlined our summary of findings below.

We would like to take you up on your offer to come to Salem and meet with you personally to review our findings and suggestions in the coming week.

Summary Points of Emphasis

Section 15 –This section results in Industrial Hemp Growers and Handlers enabled to sell direct to all licensed OLCC retailers, processors and wholesalers with proper certification and endorsements through the OLCC, providing that OLCC testing and labeling is followed.

Clarification Needed: The language is clear on what it allows; however, if HB4089 is implemented, it contradicts SB1015, which allows sales from Industrial Hemp licensees to OLCC processors only. Will the OLCC adopt new rules of HB4089 and override the current SB1015 rule of Industrial Hemp sales from growers and handlers to OLCC processors only?

Section 22: This is in the "Personal Possession" section and recommends amending 475B.311 in the marijuana rules however the language states that only an OLCC processor can process marijuana and/or industrial hemp and excludes licensed Industrial Hemp Handlers from processing Industrial Hemp into extracts. Unless the intent is to eliminate all persons, except OLCC licensed and endorsed processors, from legally extracting material from industrial hemp, this language must be changed to include ODA Industrial Hemp Handlers that hold a license under ORS 571.300

Section 23: Again, this is in the "Personal Possession" section; however, the language in this section states that only a person 21 years or older may only possess a cannabinoid extract that is purchased from a licensed OLCC retailer. Although the Industrial Hemp rules do not have a clear definition regarding a "Cannabinoid Extract" they do define "Cannabinoid" as any of the chemical compounds that are the active constituents of the cannabis plant and separately they define the word extract. The marijuana rules defines "Cannabinoid extract" as a substance obtained by separating cannabinoids from marijuana so this may be moot however to avoid confusion we would recommend that ORS 475B.337 (g) be amended