

Testimony Against HB 4034 - Directs Oregon Liquor Control Commission to establish by rule process to register medical marijuana grow sites

I **strongly oppose HB 4034** - Directs Oregon Liquor Control Commission to establish by rule process to register medical marijuana grow sites, and request my statement with exhibit be entered into the public record as testimony. I am a Eugene resident and a five-year participant in the Oregon Medical Marijuana Program. I have glaucoma, a chronic eye disease which is a leading cause of blindness. Right now, cannabis is my only viable treatment as I cannot tolerate conventional glaucoma medicines. One of my reasons for relocating to Oregon is to have safe, affordable access to a therapy that has successfully managed my condition and can prolong my eyesight. Also, in addition to being a direct (and very vulnerable) stakeholder in Oregon's Medical Marijuana Program (OMMP), I am serving on the 2020 Patient and Social Equity Subcommittee of the Oregon Cannabis Commission. By professional training and career, I'm a scientist, a records and surveillance systems developer, and a retired regulator in the public health field.

HB 4034 would increase reporting requirements on multi patient grower sites participating in the Oregon Medical Marijuana Program (OMMP). This measure is proposed without evidence that the mandated, increased reporting burden either helps the program, public health, or law enforcement concerns regarding potential diversion of cannabis from the program.

This measure further marginalizes patients like me who rely on the OMMP for their health. The liquor control commission (OLCC) is not the appropriate agency to manage the production side of a medical program. This measure, if passed, would again (this happens each time more restrictions are placed on the medical program), make it increasingly more expensive and less safe to continue cannabis therapy. This is not good public health policy, nor is it a wise law enforcement strategy.

Furthermore, the measures OLCC has taken thus far with the marijuana program, especially with respect to reporting requirements relevant to health and enforcement concerns, have been wasteful and ineffective. On behalf of the people of Oregon (for whom I am very grateful for safe access to cannabis), I contributed hundreds of hours of time to conduct an investigation of the cannabis tracking system (CTS). Through this project, I developed what is likely the largest open source data on these so-called seed-to-sale tracking systems. These systems have been sold to the states as the 'backbone' of their marijuana regulatory programs. They are costly, ineffective, and highly vulnerable to misuse.

The cannabis tracking system is a cybersecurity risk to patients and a liability risk to the state. Compounding this concern, I believe the product contracted for the cannabis tracking system, METRC, that the state relies on as its regulatory backbone, is fundamentally flawed. Supporting and using METRC takes resources from other more effective public health measures needed to run the program, and ultimately will serve as a liability for the program and the state.

I have attached a summary of findings on Oregon's cannabis tracking system as part of my testimony.

Hence, I request you to NOT advance HB 4034 for further consideration.

Respectfully yours,

Elizabeth Porter, MSSM, GISP - Eugene 97404. Submitted on January 31, 2020