

Jenn Lauder, PDX Aromatics
Senate Committee on Judiciary
HB 4013 A Testimony

February 20, 2020

Good morning, Honorable Chair Prozanski, Vice Chair Thatcher, and Members of the Senate Committee on Judiciary.

For the record, my name is Jenn Lauder, and I am the Director of Marketing and Advocacy for PDX Aromatics, a small, family-owned botanicals company based in Portland. We sell natural products such as coffee, teas, and essential oils. We're also the largest kratom vendor in the state and the first in the nation to earn GMP Qualified Vendor status from the American Kratom Association for demonstrating our adherence to current Good Manufacturing Practices.

Our company is in full support of HB 4013 A and would welcome the opportunity to collaborate with state agencies to determine how best to regulate kratom products in Oregon. We are proponents of the unamended bill, which would have set out reasonable regulations to guide kratom vendors and protect kratom consumers from misbranded and adulterated products, but we appreciate that state agencies would like more time to learn about kratom and to consider appropriate regulations for this industry.

We are ready to assist these agencies in creating a regulatory scheme that protects consumers, demands vendor compliance, and does not put undue burden on the state.

Since its founding in 2010, PDX Aromatics has been committed to quality assurance and consumer safety. Over the past four years we have become an industry leader in compliance, investing hundreds of thousands of dollars in physical plant and equipment upgrades, staff training, and enhanced lab testing procedures.

Our warehouse is an ODA-registered dry foods facility, and we are regularly third-party audited for current Good Manufacturing Practices. This means that, among other things, we implement:

- Environmental controls and rigorous sanitation and handling procedures,
- Comprehensive lab testing to guarantee purity and identify any possible contamination before products are introduced to the market,
- Proper labeling that accurately displays the identity of the product and its ingredients,
- Responsible marketing that avoids any therapeutic or medical claims,
- Age restrictions that prevent the sale of our products to minors.

We believe all kratom vendors should be held to standards such as these, and we applaud the American Kratom Association's efforts to promote GMP compliance among vendors. We have been encouraged to

see the kratom industry move toward adopting these practices on a large scale, but we know that not every company has the means or the desire to self-regulate in the absence of state or federal guidelines.

The majority of kratom companies take their customers' safety seriously and are committed to responsible practices such as the ones I described. But there remain a few bad actors who continue to offer untested or mislabeled products to consumers, threatening both a compliant industry and, more importantly, public health. For this reason, we are in favor of reasonable regulation in our industry and are eager to discuss appropriate standards and safeguards with state agencies.

The health and safety of our customers is our primary concern, a concern that is shared by all responsible, legitimate kratom vendors. We strongly believe, based on abundant historical and scientific evidence, that kratom is a safe botanical. But we also know that proper processes must be in place to ensure the safety and purity of these products for the estimated 15 million Americans who include kratom as a part of their daily routine.

Thank you again for your time and your consideration of kratom and its place in the lives of Oregonians. I urge you to pass HB 4013 A during this short session so we can begin the work of ensuring that kratom consumers in our state can be protected from contaminated and misbranded products, and so that responsible and compliant businesses such as ours can continue to provide our customers with safe, pure products.

I'm happy to answer any questions about kratom, its consumers, or our company's efforts to become compliant with Good Manufacturing Practices.

Respectfully,

Jenn Lauder

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