

Jenn Lauder, PDX Aromatics
House Committee on General Government
HB 2646 Testimony

February 4, 2021

Good afternoon, Honorable Chair Wilde, Vice Chairs Leif and Lively, and Members of the House Committee on General Government.

My name is Jenn Lauder, and I am the Director of Marketing and Advocacy at PDX Aromatics, a family-owned natural products company based in Portland. We appreciate your consideration today of the Oregon Kratom Consumer Protection Act, as well as the opportunity to explain why we are in favor of the regulations outlined in HB 2646.

PDX Aromatics was founded in 2010 as a manufacturer, wholesaler, and retailer of tea, coffee, essential oils, and other plant-based products. We have since become the largest kratom processor in the state; our kratom brands are sold here in Oregon and nationwide.

Kratom is a plant leaf from Southeast Asia that has been consumed for centuries by people indigenous to that area and more recently has gained popularity in the United States. An estimated 15 million Americans use kratom regularly, most often brewed as a beverage, ground into a powder, encapsulated, or prepared as a liquid extraction. Most consumers are middle aged adults; many forgo their morning coffee in favor of a cup of kratom tea.

There is ample anecdotal evidence and a growing body of scientific research that demonstrate that kratom is a safe botanical product. Our company would not sell it otherwise. From the start, PDX Aromatics has prioritized quality assurance and consumer safety over all other goals. This is our real bottom line. So, in the absence of any governmental regulation, we have worked to self-regulate according to current Good Manufacturing Practices set forth by the Food and Drug Administration.

This means that we have invested hundreds of thousands of dollars in physical plant and equipment upgrades, staff training and continuing education, enhanced lab testing procedures, and supply chain auditing. If you visit our warehouse, you will notice rigorous environmental controls and sanitation and handling procedures: cleanrooms, personal protective equipment, and separate facilities for quarantining raw material until satisfactory lab tests return.

If you purchase our products, you will receive an accurate label that identifies ingredients and includes serving size suggestions. You will not be subjected to deceptive marketing that makes therapeutic or medical claims, and you can request a certificate of analysis from an accredited third-party lab for any product we sell. We will be more than happy to oblige.

These are best practices, and we pride ourselves on our compliance. We were the first company in the nation to earn GMP Qualified Vendor status from the American Kratom Association, and we continue to conduct annual compliance audits with a third-party GMP consultant to keep our qualification current. Additionally, our facility is registered with the Oregon Department of Agriculture and is inspected by ODA every two years.

This work may be cumbersome but it is not unreasonable, and it is, in fact, necessary. We believe any company that brings a kratom product to market should hold themselves to generally accepted standards such as these.

Not everyone is as inclined as we are to self-regulate though. We know there are bad actors in our industry who care more about their profit margins than their customers. They scrimp on testing costs or proper packaging and labeling; they make overblown claims about kratom's effects. Some of them are operating out of basements and bedrooms, with no regard for Good Manufacturing Practices. This not only undermines the legitimacy of our industry; more importantly, it could negatively affect the health of our consumers.

We applaud efforts by the American Kratom Association to encourage cGMP compliance among kratom vendors, and we are confident that the majority of kratom companies share our commitment to consumer safety. But we also know that the regulations established in the Kratom Consumer Protection Act are needed if we are serious about ridding our industry of unscrupulous actors and prioritizing public health.

PDX Aromatics is in full support of HB 2646 and of reasonable regulations to guide kratom vendors and protect kratom consumers from misbranded and adulterated products. We are ready to assist the Department of Agriculture in creating a regulatory scheme that protects consumers, demands vendor compliance, and does not put undue burden on the state.

Thank you again for your time and your consideration of the Oregon Kratom Consumer Protection Act. I urge you to pass HB 2646 out of committee so we can begin the work of ensuring that consumers in our state are protected from adulterated and misbranded kratom, and so that responsible and compliant companies such as ours can continue to provide our customers with the high-quality, lab-tested natural products they expect and deserve.

Respectfully,

Jenn Lauder

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