



April 19, 2021

COMMENTS REGARDING HOUSE BILLS 2281 AND 3000

Dear Chair Smith Warner, Vice-Chairs Drazan and Holvey,
and Representatives Bonham, Fahey, Salinas, and Zika,

Thank you for the opportunity to provide some brief comments on House Bills 2281 and 3000.

Oregon should make a few significant changes to its cannabis programs to address recent serious issues - particularly in the hemp industry - as well as getting the Oregon cannabis industry situated as best as possible for the emerging interstate and global markets for cannabis products.

With regard to the Oregon hemp program, it appears we may be heading toward putting another band-aid on things for now, which apparently includes one or more of the following elements:

- **HB 3000:** Latest draft worked up primarily by state agencies;
- **HB 2281:** Extensive gut-and-stuff worked up by the hemp industry; and/or
- **Enforcement:** What the hemp industry has offered up in replacement for HB 2296, which they killed.

Counties generally balance three basic principles in the cannabis arena: Public health, public safety, and economic development. Counties are heavily involved in all three of those at a ground level, and have concerns about the current state of the Oregon cannabis industry in each of those:

- (1) **Public safety:** Major public safety issues in the hemp industry, particularly in Southwest Oregon;
- (2) **Public health:** A growing public health issue around how easily it is for people and kids to convert the primary cannabinoid produced by the hemp industry (CBD) into an intoxicant; and
- (3) **Economic development:** The entire Oregon cannabis industry needs to start preparations for interstate and international commerce in cannabis products - especially since Oregon is arguably one of the best places on Earth for the production of cannabis and cannabis products, and it is highly likely that the cannabis industry will continue to be a major part of the Oregon economy.

Oregon can best accomplish all three of the above by taking the following actions:

(A) **Unified regulation:** Making sure that all cannabis and cannabis products are in the regulated market for intoxicants - *i.e.*, in the OLCC system where only adults and OMMP cardholders may make purchases - so that kids will no longer be able to buy CBD on the open market from retail shelves or the internet, and then easily convert the purchased CBD into an intoxicant;

(B) **Leveling the playing field:** Lightening the regulatory load on marijuana licensees, while at the same time raising the regulatory load on hemp licensees, until they are on a level playing field; and

(C) **Integrating OMMP:** Ever since the passage of Ballot Measure 91, OMMP patients have been largely left behind - Oregon should carefully move that program to OLCC in a way that makes sense to both OLCC and OMMP advocates.

In short, AOC supports taking care of (1) through (3) above by doing (A) through (C) above. Thank you again for considering our brief comments.

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