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RE: -1 amendment to HB2931

Greetings Chair Kropf, Vice chair Anderson and Whallan,

For the record my name is Adrienne Rae, and my peer-reviewed publications appear under the surname Wilson-Poe. I currently serve as the vice chair of the Oregon Cannabis Commission (OCC). I have also served on the research and leadership subcommittee of the OCC since 2019, and I'm the chair of that subcommittee. I am also an NIH-funded translational neuroscientist, I have been studying the effects of cannabis in both laboratory and clinical settings for 20 years.

Beyond decriminalization, the single greatest benefit of cannabis legalization is the fact that cannabis patients and consumers now have the benefit of mandatory laboratory testing. Lab testing is the single greatest benefit to our citizens, because unlike any other time in history, people are empowered with information about exactly what is in the products they are buying.

Unfortunately, commercial forces have put great pressure on laboratory testing results. Because of the high monetary value of potent products with high THC levels, cannabis cultivators and brands are inherently incentivized to create products with higher and higher levels of THC. This revenue pressure creates a perfect storm whereby cultivators and brands may "shop" for a testing lab which produces favorable results: those with the highest THC values.

The problem is that these values are inaccurate. They are falsely inflated using a number of deceptive or erroneous laboratory testing practices. This phenomenon is called potency inflation, and the result is called consumer fraud. My team and I have recently published a study about this in the peer-reviewed journal "[Psychoactives](#)."

Potency inflation puts our most honest and accurate laboratories out of business, leaving the supply chain to depend upon dishonest and inaccurate labs for cannabis testing. The result is that our citizens, our patients, are currently buying more mis-labeled cannabis products than at any other time since testing labs first opened.

Potency inflation harms our medical patients, who often [prefer](#) products with lower levels of THC. Potency inflation is also a major public health risk: most of the well-known negative effects of cannabis such as addiction, driving impairment, and psychotic-like symptoms, are ALL associated with high doses of THC.

Despite the rampant fraud happening across our state, the few and feeble checks and balances we do have are insufficient to protect our citizens. The creation of a State Reference Laboratory, as recommended by the Oregon Cannabis Commission in 2019, would address this issue, among several other important issues.

In addition to curbing potency inflation, the Reference Lab would serve as a critical authority on lab operating procedures, and train laboratory staff to test cannabis and hemp appropriately. It would serve a critically missing role in auditing products for accurate labeling, and support a more robust recall mechanism for mislabeled products.

The Cannabis Commission also feels strongly that the Reference Lab should fulfill a critical (and currently missing) role as a repository of lab testing data. A data repository would serve two critical functions: 1) it facilitates public health research, and 2) it strengthens consumer transparency. Today, consumers purchasing cannabis in the adult-use market (which includes thousands of patients who have left the Oregon Medical Marijuana program) have no legal right to lay eyes upon the lab test results. The data repository would rectify this.

In closing: Although the Oregon Cannabis Commission wholeheartedly supports HB 2931, there are important provisions which are missing and misaligned with our Commission recommendations. Although we are confident that the bill makes great strides in protecting the rights and health of our citizens, we also welcome the opportunity to engage with you in a work session to refine it.

Thank you for considering my testimony.

Kind regards,

A handwritten signature in black ink, appearing to read 'Adrienne Rae' with a stylized flourish at the end.

Adrienne Rae (Wilson-Poe) PhD