



## **Please Oppose SB 1548 - Keep Existing Policies for THC Limits in Cannabis Edibles**

Dear Chair Nguyen and Vice Chairs Isadore and Skarlatos,

My name is Kaliko Castille. I'm a Milwaukie resident and currently serve as Political Director at APANO Action Fund, but I'm reaching out today in my personal capacity as a longtime cannabis industry professional.

Over the past decade, I've worked at the forefront of Oregon's cannabis industry — from helping open one of Oregon's first medical dispensaries in 2013, to serving as Director of Marketing at the [National Cannabis Industry Association](#), to serving as President of the Board of Directors for the [Minority Cannabis Business Association](#), where I helped lead the development of model cannabis legalization policies and the National Cannabis Equity Report (attached).

### **I'm writing to urge you to vote NO on SB 1548.**

I understand and respect the child-safety intentions behind this bill. But after reviewing the evidence carefully, I do not believe SB 1548 will achieve those goals — and I believe it will cause significant, unnecessary harm to Oregon's regulated cannabis industry in the process.

On the child-safety question: context matters. According to [2023 data from the Oregon Poison Center](#), the leading causes of accidental poisoning in children ages 0-5 are household cleaning supplies (1,659 incidents), cosmetics and personal care products (1,636), and analgesics (1,606).

### **Cannabis edibles account for only a few hundred incidents — orders of magnitude fewer than other household items -- and it doesn't even crack the top 10.**

Even Dr. Rob Hendrickson, the medical director of the Oregon Poison Center at OHSU, acknowledged in a [recent OPB interview](#) that the primary solution is education and responsible storage — urging adults who have any exposure to toddlers to treat cannabis edibles like they could harm a child and store them up high, preferably in a locked container. That's exactly the kind of targeted, practical intervention that can actually change outcomes. SB 1548 doesn't do that — it places new burdens on licensed producers while leaving the root cause unaddressed.

It's also worth noting that the recent rise in reported cannabis-related pediatric hospital visits likely reflects increased willingness among parents to disclose cannabis exposure now that it is legal, not necessarily a true spike in incidents.

The data deserves careful interpretation before it drives major regulatory changes. Furthermore, the federal data does not support the assumption that unit dose packaging is inherently safer for children. A [U.S. Consumer Product Safety Commission analysis](#) found it could not conclude that individual unit packaging outperforms continuous child-resistant packaging for child protection.

Their testing showed that over half of children tested were able to open at least one unit of a "child-resistant" unit dose package, while a standard reclosable child-resistant closure blocked 85% of children entirely. Once individual units are broken out of a package, that layered protection is gone. SB 1548 could actually multiply the number of exposed loose units in Oregon homes.

Equally important: this bill does nothing to address the most likely source of dangerous accidental exposures — unregulated, unlabeled, homemade edibles of unknown potency. Those remain completely legal. In states that have imposed strict limits on the regulated market, a well-documented trend has emerged: consumers turn to making their own edibles at higher rates. SB 1548 could inadvertently increase risk rather than reduce it.

On the economic side, the burden of this bill falls hardest on the businesses already doing everything right. Oregon's licensed edible producers already comply with strict child-resistant packaging, testing, labeling, and age-verification requirements. Mandating individual wrapping for every edible unit — regardless of THC content per unit — would require major changes to manufacturing equipment, packaging lines, and compliance systems. The added plastic waste alone is a significant environmental concern. For small and mid-sized processors, these costs could be insurmountable.

The current framework — 10mg per dose, 100mg per package — was established through rigorous study by OHA, OLCC, and other regulatory agencies. It represents a carefully considered balance between consumer choice and public safety, and it is closely aligned with emerging national standards. It is working.

What's needed now is not a destabilizing mandate, but a collaborative conversation between industry, public health professionals, and regulators — focused on mitigating the greatest risk posed to children through proper education and responsible storage.

I respectfully urge you to vote NO on SB 1548.

**-Kaliko Castille**

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