

Submitter: Brent Kenyon  
On Behalf Of: Oregon Original llc  
Committee: House Committee On Economic Development, Small Business, and Trade  
Measure, Appointment or Topic: SB1548

#### Written Testimony in Opposition to SB 1548

House Committee on Economic Development, Small Business, and Trade

Chair Daniel Nguyen and Members of the Committee

Dear Chair Nguyen and Members of the Committee,

I write today to respectfully express my firm opposition to Senate Bill 1548.

My name is Brent Kenyon. I have worked as a cannabis consultant and industry developer for more than 25 years. During that time, I have worked closely with industry stakeholders, members of the Oregon Legislature, and multiple Governors on the implementation of both Oregon's medical and adult-use cannabis programs. I have donated hundreds of hours serving on OLCC Rules Advisory Committees, consulting with agency leadership, and working alongside the first OLCC staff tasked with implementing Measure 91. Most recently, I participated in the Illegal Hemp and Cannabis Task Force, collaborating with legislators and law enforcement to address public safety concerns—particularly those involving unregulated hemp-derived products that remain widely available in convenience stores throughout Oregon. In my view, those unregulated products present a far greater public safety concern than the issues SB 1548 seeks to address.

As this committee focuses on economic development and small business, I urge you to carefully consider the economic consequences of this bill.

My company, Oregon Original, is a small, family-owned edible manufacturer. Our single 100 mg gummy product represents approximately 75% of our annual sales. SB 1548 would require changes that could necessitate costly packaging redesigns and, in many cases, automation equipment to individually wrap products. Large, multi-state operators may be able to absorb those costs. Small Oregon-based businesses cannot.

In addition to the financial burden, this bill would significantly increase unnecessary packaging waste. Mandating individual wrapping for each gummy runs counter to Oregon's environmental values and sustainability goals.

Oregon has already addressed dosage clarity through existing regulations requiring physical markings on each gummy to clearly identify a single 10 mg serving. These requirements directly responded to concerns about consumer understanding and have strengthened our regulatory system. In my professional opinion, Oregon now has one of the most robust and thoughtfully regulated cannabis systems in the nation. Other states routinely look to Oregon's framework as a model.

OLCC rulemaking standards require the agency to carefully evaluate both the financial impact on licensees and environmental consequences before adopting changes in packaging and labeling. (475C.612(4)(c),(d)). SB 1548 raises serious

concerns in both areas, and I respectfully ask that this Legislature apply the same level of scrutiny.

The simple reality is that wrapping each individual gummy in a small piece of paper or plastic will not prevent youth overconsumption. Like exit packaging requirements, it creates the appearance of increased safety without producing meaningful public health benefit. Cannabis does not present a toxic overdose risk in the traditional sense, and additional wrapping will not materially change outcomes.

For these reasons, I respectfully urge the committee to oppose SB 1548 and to protect Oregon's small cannabis businesses from unnecessary and burdensome mandates.

Thank you for your time and consideration.