

Submitter: Amanda Brown

On Behalf Of:

Committee: House Committee On Economic Development, Small Business, and Trade

Measure, Appointment or Topic: SB1548

RE: Strong Opposition to Senate Bill 1548
Submitted by: Amanda Brown

I am submitting this testimony in firm opposition to Senate Bill 1548. I urge this committee to examine the evidence before advancing a bill that contradicts federal child safety standards, Oregon's environmental values, and what every comparable legal market has chosen to do. This is not a close call. The data is clear.

Proponents cite Washington's 2017 law as proof these measures work, pointing to a 75% reduction in hospitalizations and 50% fewer poison center reports. That citation is accurate. What is consistently omitted is the mechanism. Washington achieved those outcomes through a per-serving potency cap of 10 milligrams of THC. Washington did not mandate individual wrapping. Oregon's OLCC already enforces a 10 milligram per-serving cap. Oregon has already implemented the intervention that produced Washington's results. SB 1548's wrapping mandate is not supported by Washington's data, not supported by data from any legal state, and has not been validated by a single peer-reviewed study. This committee is being asked to impose an untested requirement on a compliant industry using evidence that argues against doing so.

The wrapping mandate does not enhance child safety. It undermines it. The federal standard governing child-resistant packaging, ASTM D3475, is built on one principle: continuous protection through a single, unified, difficult-to-breach barrier. SB 1548 replaces that barrier with dozens of individually wrapped loose units. Critically, SB 1548 does not require each individual wrap to meet any child-resistant standard. That means once the outer package is opened, every loose unit inside is secured by nothing more than a piece of foil or plastic that any toddler can unwrap. Once the outer container is opened, those pieces migrate into handbags, glove compartments, and coat pockets, exactly where children reach unsupervised. This bill creates more access points, not fewer.

The environmental consequences are equally serious. New Mexico requires all cannabis containers to be compostable or recycled. New York mandates 25% post-consumer recycled content and internal dispensary recycling programs. Colorado created take-back programs to reduce landfill burden. SB 1548 moves Oregon in the opposite direction, requiring individual plastic or foil wrapping on every single unit sold while peer states legislate toward sustainability.

The businesses most likely to close under this mandate are Oregon-owned processors, the ones who built this market. Their market share will not disappear. It will migrate to the illicit market and unregulated online retailers shipping intoxicating products into Oregon with no testing, no labeling, and no age verification. The Legislature will have protected no child and eliminated the licensed businesses that exist specifically to keep cannabis out of unregulated channels.

The evidence supports education and secure home storage campaigns, the same framework applied to alcohol and firearms. Industry is ready to build that campaign. That is evidence-based policy. SB 1548 is not.

I respectfully ask this committee to oppose SB 1548.

Respectfully submitted,
Amanda Brown