



Written Testimony in Opposition to SB 1548 Before the Oregon House Economic Development Committee

Chair and Members of the Committee,

My name is Tucker Holland. I am a co-founder, Chief Financial Officer, and Processing Director of Entourage Cannabis, a vertically integrated Oregon cannabis company based in Eugene. I hold a B.S. in Chemistry from the University of Central Oklahoma and serve in national standards development work through ASTM International Committee D37 on Cannabis, where I am actively involved in packaging, labeling, and preroll analysis standards development. I also serve in leadership within the Cannabis Industry Alliance of Oregon (CIAO).

I am writing in strong opposition to SB 1548.

While I deeply respect the stated goal of protecting children, SB 1548 will cause severe economic harm to compliant Oregon businesses, including mine, without evidence that it will meaningfully reduce accidental ingestion.

Direct Economic Impact on My Company

We recently invested significant capital to build a brand-new edibles division, including compliant kitchen infrastructure, equipment, packaging systems, staffing, and regulatory approvals. SB 1548 would require a complete redesign of our production model.

If this bill passes:

- Our edibles division will no longer be economically viable.
- We will be forced to shut down that division entirely.
- We will lay off the employees hired specifically for that operation.
- The loss of this investment creates a very real risk of overall business failure.

This is not theoretical. The required shift to individually wrapped 10mg units fundamentally alters production throughput, capital requirements, packaging line design, labor intensity, and cost of goods. For small and mid-sized Oregon operators, there is simply no path to absorb these changes.

Oregon's cannabis industry is already operating on razor-thin margins due to oversupply, federal tax burdens under 280E, price compression, and regulatory compliance costs. SB 1548 is not a marginal adjustment; it is an existential mandate.

Oregon Already Requires Child-Resistant Packaging

Oregon already mandates strict child-resistant (CR) packaging for all cannabis products. These requirements align with nationally recognized safety standards developed through ASTM and federal packaging frameworks.

Layering individual wrapping inside a compliant CR package does not necessarily increase safety. In real-world consumer behavior:

- Consumers will routinely remove individually wrapped units from the outer CR container for convenience.
- Once removed, the CR protection is effectively bypassed.
- Individually wrapped pieces can then be left in backpacks, cars, purses, and homes.

The result may be *more* access points, not fewer.

Multi-layer packaging systems can create a false sense of security while complicating safe storage practices.

From a standards-development perspective, safety solutions must account for actual human behavior, not theoretical packaging layering.

Economic Consequences for Oregon

The products targeted by SB 1548 represent a substantial portion of the regulated edible market. Eliminating or economically crippling this category will result in:

- Job losses across manufacturing, packaging, distribution, and retail.
- Reduced state cannabis tax revenue.
- Decreased Measure 110 funding streams.
- Lost local income tax contributions.
- Lost vendor contracts for Oregon-based packaging and ingredient suppliers.

For companies like mine that support farms, employ skilled workers, and invest in Oregon manufacturing, this bill threatens not just a product line, but long-term operational stability.

Risk of Market Displacement

When compliant products become more expensive or disappear, consumers do not simply stop purchasing. They shift to:

- Out-of-state markets
- Illicit operators
- Unregulated products lacking labeling, testing, and child-resistant protections

This undermines both public safety and the economic goals of Oregon's regulated system.

Standards-Based Solutions Exist

Through my work with ASTM International, I can confidently say that credible, consensus-driven packaging standards already exist and continue to evolve. If there are identified safety gaps, the solution is to:

- Improve safe storage education
- Partner with poison control centers
- Increase public awareness campaigns
- Refine labeling clarity and packaging standards based on proven data
- Study actual ingestion pathways before imposing structural mandates

Policy should be evidence-based, standards-aligned, and economically sustainable.

SB 1548 is none of those.

Closing

I am not asking for deregulation. I am asking for smart regulation grounded in data, human behavior, and economic reality.

SB 1548 will:

- Shut down compliant edible manufacturing operations like ours.
- Eliminate Oregon jobs.
- Reduce state revenue.
- Push consumers toward less safe markets.
- Fail to address the root causes of accidental ingestion.

For my company, this bill threatens the closure of a newly built division and jeopardizes the stability of our entire business.

I respectfully urge you to vote NO on SB 1548.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tucker Holland', with a stylized, cursive script.

Tucker Holland
Co-Founder, CFO & Processing Director
Entourage Cannabis
Eugene, Oregon