



Chair and Members of the Committee:

I write today to express my concern regarding SB 1548.

While the intentions behind SB 1548 are well-meaning, the unintended consequences it would create are significant and, in my view, unacceptable. We must work together to develop realistic, evidence-based solutions that truly improve safety without undermining responsible businesses and state revenue.

SB 1548 does not address the growing accessibility of so-called “gray-market” cannabis edibles, which can be purchased online without ID verification and without child-resistant packaging requirements. These unregulated products present a far greater risk to children than Oregon’s tightly regulated legal market.

Oregon is a national leader in cannabis packaging and safety standards. Our required, continuously resealable, child-resistant packaging allows consumers to store products securely. Mandating that edible products be broken into individual 10mg units packaged separately would create multiple access points within a household, reducing convenience and potentially decreasing safe storage compliance. More packaging does not necessarily mean more safety.

We have a responsibility to educate consumers and children alike about the risks of accidental ingestion. Economists estimate that every dollar invested in poison prevention marketing saves \$13 in healthcare costs. Education and prevention are proven tools. Regulation that increases waste and cost without measurable safety gains is not.

The cannabis industry is also an important revenue generator for the State of Oregon through retail cannabis tax, employment tax, and CAT tax. Despite operating in one of the most competitive and price-compressed markets in the nation, Oregon’s cannabis businesses continue to generate substantial revenue for the state. We must not asphyxiate this revenue stream with policies that make legal products financially impractical.

The majority of cannabis producers, processors, and retailers are small businesses — including my employer, Mule Extracts. At Mule, we provide fully paid healthcare coverage for full-time employees, 401(k) participation, and meaningful opportunities for career growth. These benefits are made possible in large part by the sale of edible products, which would be economically harmed by this legislation.

If SB 1548 demonstrably increased safety outcomes, it would have my full support. Unfortunately, it is the wrong solution to the problem. Education, enforcement against unregulated markets, and continued safe access through regulated channels are the most effective ways to prevent accidental consumption by minors.

Finally, the environmental consequences of this bill cannot be ignored. Requiring individual 10mg packaging would significantly increase single-use plastic waste. Currently, much of our packaging is domestically sourced and recyclable, including materials supplied by Oregon companies such as P3 Distributing in Milwaukie. The packaging model required under this bill would likely eliminate those sustainability efforts.

For the sake of public safety, environmental responsibility, small businesses, and state revenue, I respectfully urge you to vote no on SB 1548.

Thank you for your consideration.

Sincerely,
Will Irwin, Chief Business Officer, Mule Extracts