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On Behalf Of:
Committee: House Committee On Economic Development, Small Business, and Trade
Measure, Appointment or Topic: SB1548

I am writing to share serious concerns about SB 1548 and the impact it would have on Oregon's legal edibles market.

This proposal would force major changes to manufacturing processes, packaging lines, equipment, compliance systems, and product design for edible producers across the state. Those changes are not minor adjustments. They represent costly operational overhauls that will affect every licensed producer, with small and mid sized businesses carrying the heaviest burden. For some operators, the financial shock could mean closure. That puts Oregon jobs and locally owned businesses at real risk.

The added costs will not stay at the production level. They will be passed on to consumers in the form of higher prices and fewer product options. Medical patients and responsible adult consumers will pay more for the same total dosage, with no clear evidence that the change meaningfully improves safety.

SB 1548 also does not address the illicit or illegal online market. It applies only to licensed, compliant Oregon businesses that already follow strict requirements for child resistant packaging, labeling, testing, and age verification. Increasing regulatory pressure on operators who are already compliant does not solve problems created by unregulated sellers. In fact, raising prices in the legal market risks pushing some consumers toward those unregulated sources.

There are environmental concerns as well. Limiting edible packaging to 10mg unit doses would dramatically increase the amount of individual wrapping required. That means more plastic, more materials, more shipping weight, and more waste in landfills. At a time when Oregon emphasizes sustainability and waste reduction, this requirement moves in the opposite direction.

Perhaps most importantly, the child safety implications deserve careful consideration. Federal child safety standards emphasize maintaining continuous child resistant protection and reducing access points. Multiplying individually wrapped unit dose pieces can create more loose items once packaging is opened. That fragmentation may increase opportunities for accidental access rather than reduce them. The shared goal is keeping adult use products out of the hands of children. The solution should strengthen continuous child resistant systems, not weaken them through unintended design consequences.

I fully support thoughtful, effective policies that improve safety while maintaining a stable, well regulated market. However, SB 1548 appears likely to increase costs, reduce product availability, strain small businesses, create more packaging waste, and potentially undermine child safety objectives, all while leaving the illicit market untouched.

I appreciate the time and consideration given to this issue and hope these concerns are taken into account as discussions continue.