

Testimony on SB1548A

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To Whom it May Concern,

I, Kristin McNally, am writing to express my clear opposition to SB1548A. I am the Managing Member of Forty to Five LLC DBA Tasty's. We are an OLCC Licensed Cannabis Processor who specialize in Cannabis Infused Edibles.

When they say SB1548A will put people out of business, they are talking about businesses like mine. It would be hard to find anyone who cares more about this, and would be more impacted by this, than I am.

But that's not what I want to talk about right now.

I started working in the Cannabis Industry while attending Portland State University in August 2013. I worked with Medical Marijuana patients, providing care to them. I was there when Medical Marijuana Dispensaries opened in March 2014. I saw the mayhem of Recreational Marijuana in 2016, and the complete transition in 2017. I saw the Medical Marijuana patients move to Recreational access points.

The rise and fall of cannabis businesses, and the origin story of industries leaders, through the last 10 years, has been quite the journey. I saw Wyld deliver their first gummies, Gron's first chocolate bars, and Nectar gobble up empty corner stores across town.

Oregon founded and Oregon based companies have become leaders in the Cannabis Industry across the United States. Oregon businesses have set the example of how Cannabis Business should operate and what the Cannabis Industry is; professional, consistent, high quality, regulated, and safe.

We all have a vision. All the Oregon founded and based Regulated Cannabis Companies.

**Our vision is simple. We want to ensure that those who would benefit from Cannabis are able to access it through a legal, regulated market. We believe in clean, safe, consistent, high quality, and legal Cannabis.**

My life's work has been to destigmatize Cannabis and to bring safe, regulated Cannabis to the people.

## **Unregulated Hemp-Derived Delta-9**

If you didn't know, there has been a massive surge in Unregulated, Hemp-Derived Delta-9 Products across the United States. Oregon has made the sale of these products illegal in stores, but in pretty much every other state, every convenience store has a stack of these in the corner.

The Hemp-Derived Delta 9 Industry is entirely Unregulated. There are no safety measures, no testing, no labeling requirements, no packaging requirements, not potency limits, no licenses, no barriers to entry, no rules. There are high dose edibles being shipped across the country. Shipped right here to anyone who wants in Oregon. Doesn't matter the age.

This is a problem.

HB1548A, without a doubt, will shift Oregon consumers from OLCC Regulated Businesses to Unregulated Hemp Derived Delta-9 Online Sales.

I don't think HB1548A is about Children's Safety at all.

Whether genuinely ignorant, or down-right malicious, HB1548A is suspicious in it's intent.

## **Regulated Industry**

Every piece of Cannabis produced through the Regulated OLCC market is rigorously tested at every stage of the process.

The flower, the concentrates, the extracts, the tinctures, the edibles. All go through highly regulated and regimented protocols to ensure that only the safest products are made available. These protocols ensure each step of the process prevents Cannabis from entering the Unregulated Market.

Edible packaging is CR-1700 certified and approved in advance by the OLCC to meet the strict requirements set forth by the FDA. The same child-proofing rules that are used to regulate pharmaceuticals.

Each label is subject to highly specific and detailed rules that ensure the consumer is given clear instruction and disclaimers on the efficacy and usage of the product.

All of these rules have been developed over the last 13 years to ensure things are as safe as possible.

The unregulated market is where children and minors are most exposed as there are no rules, standards, or safety precautions in place.

## **The Shifting Landscape**

The industry has worked with the regulations and navigated the shifting requirements.

From the unregulated medical markets, where you could just buy a 1000mg gummy in a zip lock, to the 5mg dose max 15mg a bag Recreational Launch sizes, to the 50mg per package limits, to the 100mg per package limits with score marking guides... It's been a ride for us.

Here at Forty to Five, we have altered and updated our packaging designs for compliance standard adjustments more times that I can count or remember. Even this last year, 2025, we had to discontinue the use of artificially derived CBN and update all of our Nutrition Panels from the OLCC Custom Format to the FDA Standard Format.

These changes have cost us hundreds of thousands of dollars. It has filled countless dumpsters with waste. Yet we do it, we troop it out because we believe in what we do.

I can tell you now, that SB1548A is the single most severe regulatory change to roll out since Recreational Cannabis was legalized 10 years ago.

Out of all 112 products my business produces, only 7 of them would meet these standards.

After years of working to build this dream... After years of constant regulatory changes. My business would not be able to survive the abrupt and extreme regulations proposed in SB1548A.

## **About our Business**

Not all of us have a million dollars to spend to rebuild our entire process line and all packaging from the ground up. In fact, most of us don't.

We are a small, independently owned business located in Sandy, OR. We started in 2018 as a group of friends, who believed in the movement, and in legal access to Cannabis. We weren't rich kids or trust fund babies. We literally had nothing but tenacity and talent.

We are now a small team of 20 people. We pride ourselves in our work, in following the rules, and in making a difference in our communities.

We have made it our top priority to pay our employees a living wage. We give them three weeks of PTO, Holidays off, and Full Health Care Benefits. We pay our taxes. We follow regulations. We take care of our families. We take care of our community. We take care of the land we work on. We have our team go out and pull invasive plants. We volunteer. We pulled ourselves up from nothing and built our American Dream.

After spending the last eight years of our lives building this dream. It could all be gone.

## **One Last Story**

My dream of bringing regulated, safe, and consistent cannabis to the people has an origin story. My older brother Andrew has Generalized Dystonia. He's struggled with it for 30+ years. His hands hardly work. Speaking is nearly impossible and eating is difficult. He lives in constant pain.

Every day he eats a single unit 100mg gummy. It helps him to manage his pain enough to keep him off Opioids. It helps him find joy.

If HB1548A passes, Andrew wouldn't be able open all those packages to get his medicine. One more thing he can't do.

HB1548A would directly affect access points for disabled and elderly medical marijuana patients. Due to Oregon's Legislative Choices in Regulation, the industry has developed in a way where medical access has been diverted to recreational outlets. I have helped thousands of medical patients over the years. I have heard so many stories.

You may be surprised to know that most of our customers are elderly and disabled people. Edibles in particular are helpful for medical patients.

## **Final Thoughts**

I could go on and on about the negative implications of HB1548A.

HB1548A does not take in to consideration what it happening across the country with Unregulated Hemp Derived Delta 9 Products.

HB1548A does not take in to consideration the deeply negatively impact it will have on the OLCC Regulated Cannabis Industry.

HB1548A is not good for Oregon.

HB1548A will hurt Oregon businesses.

HB1548A will hurt the progress Oregon has made towards Safe and Legal Cannabis.

HB1548A will hurt Children.

Thank you for your consideration,

Kristin McNally