

HB 2098 -7 Comments
Les Helgeson
May 1, 2018

Chair Lively, Members of the Committee:

I am in full support of HB 2098 -7 with one reservation. Please note I do not see the "engrossed" version listed on the committee website so am referring to the -7 amendment listed.

Specifically, lines 2 -7 on page 11 of the bill should be amended to include kief derived products, including those produced by mechanical means such as hash and rosin. In particular we might replace the word "kief" on line 4 with "concentrates". Line 7 might be amended to include "mechanical devices".

We passed a bill sponsored by Rep. Gomberg last session (ORS 475B.096) which would allow such products (produced by micro-tier producers) via an endorsement. Unfortunately, the process of obtaining an OLCC endorsement has been mired in delay and uncertainty surrounding an otherwise redundant LUCS requirement.

The central problem is that concentrates are lumped into a similar category as extracts via definitional problems created in statute and OLCC rule. A solution to the problem would be best accomplished by the changes I suggest above. This should also remove the burdensome LUCS requirement since we would effectively be allowing "dairy farmers to milk their cows".

The formation of a testing advisory committee is long overdue and I would be willing to participate as a member given personal experience and discussions with ORELAP and others. Sample preparation appears to be a cause for substantial error and OHA rules barring retesting for compliance purposes are subject to discussion.

I also support the additional Senate amendments offered so long as they augment the bill as passed by the House.

Thank you. I would be happy to address any questions you may have.

Sincerely,

Les Helgeson
Green Hills LLC