Dear Chair Prozanski, Vice Chair Thatcher and Members of the Senate Committee on Judiciary~

I thank you for your time and consideration. I oppose SB 1561 for three main reasons. The USDA'S "Interim Rules" for hemp make clear in this direct quote from the Federal Register Vol. 84, No. 211:

Nothing preempts or limits any law of a State or Tribe that regulates the production of hemp and is more stringent than the provisions in the 2018 Farm Bill. State and Tribal plans developed to regulate the production of hemp must include certain requirements when submitted for USDA approval. These requirements are outlined in the following sections.

Yet SB 1561 would require the State of Oregon's "Hemp Plan" to be "weaker" than Federal standards: (SB 1561)
The department may not adopt a rule that imposes more stringent standards on persons licensed under ORS 571.281 than any standards required by applicable federal law or regulation unless the department first appoints, and receives recommendations from, an advisory committee convened pursuant to ORS 183.333.SECTION 3.

I believe the State should have Statutory authority to make Oregon's "hemp plan" as stringent as necessary to ensure the viability of the OTHER Cannabis crop in Oregon, "marijuana" or THC Cannabis in the State's regulated OLCC system. Co-existence is key and only our State can determine what is necessary to ensure strict parameters to avoid cross-pollintation of the crops, for example. This will more than likely need to be "more stringent" than the Federal rules, applicable to Oregon's specific needs for "Co-existence" of hemp and marijuana.

I also do not agree with giving the ODA complete authority to implement the State's plan WITHOUT Legislative "checks and balances". "Public comment" is just that and nothing more. This exclusive authority is a dangerous and slippery slope because hemp is NOT LIKE every other crop in that it is being used as a "foil" to grow high-grade THC out in the open. (see OLIS House Ag and Land Use-Wednesday Feb 5-1:12:07 where the AOC states there is "massive bleed out daily" from the hemp program in Oregon). Until there is tracking in-place for hemp as in other Cannabis crops, this trend will continue. Since stopping leakage to the "black" (unregulated) Cannabis market is the State's top-priority, exclusive authority leads to an emasculated State governance. We should not have to "sit and watch" while outlaws of epic proportion use the hemp program to illegally sell THC. The Legislature MUST remain involved in overseeing the parameters of any State "hemp plan".

I also oppose SB 1561's directive:
Directs Oregon Liquor Control Commission to establish by rule process to register medicalmarijuana grow sites. Defines "medical marijuana grow sites." Allows medical marijuana grow sitesto apply for registration not later than September 1, 2020.Establishes plant production limits formedical marijuana grow sites registered by commission. Becomes operative June 1, 2020.

Again, with the "massive leakage daily" with the unregulated and uninspected hemp program, there is no reason to harm over 75% of the State's OMMP patients. The demographics of which is a MAJORITY of patients who are 60+ years of age, are Veterans and on disability or SSI. In other words, Oregon's most vulnerable citizens!! SB 1561 completely misses the mark by "punishing" those patients, meanwhile the hemp program remains wide-open for abuse by outlaws selling into the unregulated market. Can't have one without the other. Until there is tracking and MANDATORY

INSPECTIONS for hemp, there is no reason to harm vulnerable Oregonians. This WILL NOT "curb leakage", it will only harm citizens with MEDICAL MARIJUANA NEEDS!!!

A "Short Session" is NOT the time to grapple with these HUGE issues. Do NOT PASS SB 1561 out of committee, please! These are large enough conflicts-of-interest that a "long session" will be necessary to work through these huge issues and weaknesses inherent in SB1561.

Thank you for your time and consideration!

Sincerely~

Lorianne E. Carey
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