



Entourage Cannabis

Eugene, Oregon

Chair Reynolds, Vice Chair Anderson, and Members of the Committee,

My name is Tucker Holland. I am a licensed cannabis processor in Eugene, Oregon. Thank you for having me today. I am a business owner with 65 employees making a living wage and getting health insurance. My wife, brother, and I started our family business in Oregon because 1) it's beautiful here, but 2) because cannabis has unbelievable potential to grow. Cannabis will grow the economy through tourism and substance use treatment services through the preservation of Measure 110 taxes.

All that said, I am actually here to answer any questions and lend my expertise in international standards development in cannabis through ASTM International. I have been a part of the ASTM since 2022 and am honored to serve in some leadership positions within the organization's committees.

Formed in 1898, ASTM International is one of the world's largest and most respected international standards developing organizations in the world.

Its standards are relied upon across highly regulated industries, including **pharmaceuticals, food safety, medical devices, aviation, construction, and consumer products**. Regulators routinely reference ASTM standards because they are **science-based, consensus-driven, and designed to be enforceable in real-world conditions**.

Since 2018, the ASTM's cannabis program has seen important standards develop through open, multi-stakeholder committees that include:

- Scientists and analytical chemists
- Public-health professionals
- Regulators and former regulators
- Industry practitioners



These standards are intentionally designed to:

- Address **real, demonstrated risks**
- Protect consumers and employees
- Balance **consumer protection with feasibility**
- Avoid unintended consequences that **drive activity into illicit markets**

ASTM standards emphasize **detectability, traceability, and corrective action**, and the 2025 OLCC technical report shows that in Oregon's regulated market:

- Pesticide failures have declined and stabilized at **~1% or less**
- When an unsafe product is identified, it is **recalled promptly**
- Enforcement mechanisms function as intended, **with a 90% minor decoy pass rate**

These outcomes reflect a system that is already aligned with national best practices.

Specifically to Packaging and Labeling

ASTM packaging and labeling standards focus on:

- Preventing appeal to minors
- Clear communication of risk
- Practical implementation across product types

The OLCC report shows that Oregon's regulated cannabis market already reflects these principles through:

- Child-resistant packaging
- Clear potency and serving information
- Restrictions on youth-appealing imagery
- Consistent enforcement



The regulated market is already operating at or above recognized standards. Additional mandates will increase cost, move consumers and operators into unregulated markets, and fail to improve outcomes. Again, the failures identified by the state overwhelmingly occur **outside** the regulated system.

The OLCC, in its own Technical Report, found that cannabis products sold outside the regulated system (regularly referred to as hemp):

- Frequently lacked age verification
- Were sold online with minimal or no safeguards
- More often than not, failed basic testing requirements
- Higher rates of contamination
- Detection of pesticides not even included on Oregon's analyte list
- Frequent Mislabeling and lack of accountability

Because cannabis criminals operate with **even fewer controls than the less-regulated hemp market**, these findings should be understood as a **conservative indicator** of what may occur when overregulation creates access failures for adult, legal consumers.

Closing

As someone actively involved in cannabis standards development, I can say with confidence: **While not perfect, Oregon's adult-use cannabis market is already meeting or exceeding the types of standards used nationally and internationally to protect public health.**

Also, as a father of two children under the age of ten, preventing access to minors is a goal I share personally and professionally. While it is also an area where Oregon's regulated cannabis market is already performing at or above expectations, **we must rely on common sense and the individual responsibility of caretakers, as we do for other items within the home.**



I respectfully urge the committee to:

- Continue to work with our responsible industry to align policy with established standards
- Focus enforcement pressure on the criminal activity happening online
- Reject SB 1548 in its current form and contact CIAO for education and information

Thank you for your time and consideration.