



From the Desk of
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Please Oppose SB 1548 - Keep Existing Policies for THC Limits in Cannabis Edibles

My name is Casey Houlihan. I am a public policy professional writing to you today as a private citizen. In the past, I worked as the Field Director on the campaign to legalize recreational cannabis (Measure 91, 2014), and for nearly ten years I helped shape cannabis policy as the Executive Director of the largest trade association of cannabis businesses in Oregon (OR Retailers of Cannabis Association, 2014-2023).

While I certainly appreciate - and applaud - the intentions behind this bill, I do not believe that it will meaningfully help further any of our state's public safety goals. I also believe that law-abiding cannabis consumers, businesses, and the environment will all be harmed by the changes proposed in this bill.

According to the most recent data (2023) from the Oregon Poison Center (which services Oregon, Alaska, and Guam), the most common causes of accidental poisonings among children aged 0-5 are as follows:

1. Household Cleaning Supplies (1,659)
2. Cosmetics and Personal Care Products (1,636)
3. Analgesics (1,606)
4. Foreign bodies / toys / misc (1,408)
5. Dietary supplements (1,338)

Alcohol doesn't quite make the top five, but also accounts for a very large number of accidental poisonings in young children. Cannabis edibles, by comparison, account for only a few hundred - literally orders of magnitude fewer than most other common causes. Tide Pods alone account for a ridiculously high number of accidental poisonings in young children each year - though, to be fair, Tide Pods do look delicious.

No one wants children to get hurt. But the solution to preventing children from accidental poisonings is not heavy-handed legislation and regulation - otherwise, we would be discussing a bill that would require:

- All alcohol to be sold only in individual serving bottles equipped with child safety caps
- All cleaning products to be sold only in individually wrapped single-use units
- All cosmetic products to be wrapped individually in single serving packages
- Individually wrapping ibuprofen, acetaminophen, naproxen, aspirin, and all dietary supplements
- Banning Tide Pods completely

The only way to ensure the safety of young children from any number of hazards in the world is properly educating them about the risk of harm posed by those dangerous items they may encounter in life - and educating parents about how to store these items responsibly so children can't get them. That's why we have laws making it a crime for parents to make dangerous/intoxicating substances accessible to children.



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This bill will create tremendous additional amounts of plastic waste, drive up production costs for businesses, and harm responsible cannabis consumers by limiting their choice in the open market. Further, it will do nothing to prevent what is likely the most common cause of accidental cannabis overdoses: unregulated, untested, unlabeled homemade edibles of unknown potency. These would remain legal.

The current THC limits (10mg per dose, 100mg per package) were decided on as the result of rigorous study and careful consideration by multiple state regulatory agencies (OHA, OLCC, et al). Generally, these limits work very well to create a reasonable balance between consumer choice and public safety - and it is a policy that is closely aligned with what are quickly becoming national regulatory standards.

Based on my extensive cannabis policy knowledge, industry experience, and understanding of the market forces therein, it is precisely this type of regulation that will lead consumers to make more of these homemade edibles at a higher rate if they cannot easily purchase their preferred dose at a store. This is an established and well-documented trend in states with strict limits on cannabis edibles. Through this lens, it is entirely possible that **this legislation could actually lead to an increase in accidental poisonings**.

I read the testimony that was shared in the Public Hearing about the tragic story of the small child who found two 50mg muffins and ingested them, causing an accidental cannabis overdose and resulting in a hospitalization and the child being on life support for 36 hours. Based on the limited number of baked good products available on OLCC store shelves, and the lack of childproof packaging, I am inclined to think that this likely involved homemade edibles made outside of our current regulatory framework. As such, this bill would do nothing to prevent situations just like this from happening again in the future.

Lastly, **this bill could create significant accessibility challenges for people with disabilities** affecting their use of fine motor skills - many of whom rely on cannabis for relief from chronic health issues.

A conversation between industry stakeholders, public health professionals, and regulatory agencies could potentially yield more helpful proposals about how to go about equitably solving this problem - a public education campaign about safe edibles storage, for instance. But this specific proposal is half-baked.

In conclusion, the people bringing this bill forward clearly care very deeply about the health and safety of children in this state, and this is exactly the kind of thinking that ought to be driving public policy. As such, I applaud their effort. It is a noble one. But this bill doesn't solve the problem it seeks to address.

I urge you to oppose SB 1548. This bill isn't ready for primetime.

Respectfully,

Casey Houlihan