

Product Integrity Subcommittee Meeting Minutes

Date: April 16, 2018

Time: 11:30 am – 1:30 pm

Location: Portland State Office Building, 800 NE Oregon St., Portland, Oregon

Attendees:

OCC Attendees: Jesse Sweet, Andre Ourso, Jeff Kuhns

OMMP/OHA Staff: Margaret Flerchinger, Ramon Cabauatan-Vasquez and Shannon McFadden

Members of the Public as listed on the Sign in sheet: Sunnie Sanchez

Subgroups	Responsible Party
Product Integrity and Regulated Market	Andre Ourso and Jesse Sweet and Jeff Kuhns (leads)

Welcome and Introductions by the Subcommittee Product Integrity and Regulated Market

Topic	Key Discussion	Responsible
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<p>Implementation of CTS for OMMP registrants/grow sites</p>	<ul style="list-style-type: none"> • Following the law in HB 1544 • How the program goes about verifying Medical Marijuana Grow Sites • Getting some sort of estimate or data on the amount of Medical Marijuana produced in the State of Oregon by our registrants. <p>OMMP and OLCC are working on implementing applicable registrants with getting on board with tracking using CTS.</p> <ul style="list-style-type: none"> • OMMP sent notice on Friday April 13th to dispensaries and processors on what is going to be happening as far as getting them into CTS so they were emailed and mailed notification and that went directly to the person whom is deemed responsible for that facility. • This week OMMP is in the process of mailing to growers that qualify for CTS and the process they are needing to go through to activate their CTS account. OMMP created a grow site administrator so growers at a grow site that qualify for CTS need to designate a grower at that grow site to be the administrator at the grow site. They will be able to do that through their OMMOS account. Those that qualify for CTS will login to their OMMOS account designate a GSA, pay their fee and they get pushed over to METRIC which is the CTS vendor and they get their account activated. All those growers are getting notified this week VIA mail on this process. They'll have 30 days to designate a 	<p>Andre Ourso/Jeff Kuhns/Jesse Sweet</p>
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	<p>GSA, so we are hoping to start that May 1 but there might be a slight delay. We are going to give those growers till the end of May to designate that GSA then METRIC is going to start credentialing. And they should be in the system by July 1 ready to start tracking.</p> <p>CTS tracking is going to pertain to grow sites that have 3 or more patients registered at that grow site so this basically equates to more than 12 plants at the grow site. All those grow sites are going to be required to use CTS. Grow sites that are 12 and under which are Marijuana Plants but not home grows, meaning a patient just growing for themselves at their residence are going to still be required to use OMMOS which is monthly tracking system. So, they submit an aggregate report monthly to OMMP.</p> <p>DATA NEEDS *Current compliance rate with the OMMOS system as far as the people who are required to file and what percentage of those people are filing. We can take this as our base line and move forward with CTS and use a similar number for CTS after July 1.</p>	
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	<p>What are we as a State doing to investigate these reports further to prevent leakage. CTS is to track from both the Medical Market and the Recreational Market. Might need to work backwards to find out which avenue the leakage is prominently coming from.</p>	
<p>Verification of medical marijuana grow sites</p>	<p>OMMP has a strict confidentiality provision on what we can share not only with law enforcement but what we can share with the public. Generally, the idea is if there is a media report or law enforcement request on an individual that might be suspected of doing anything illegal we will communicate directly with that law enforcement agency with the individual's registration status basically just verifying if they are registered with us or not. Then we do follow up internally if we see news or media articles on the individual from Oregon that has been apprehended and suspected of participating in any illegal activity.</p> <p>Law enforcement must call OMMP with an address and we are able to reply with a yes or no if a Medical Marijuana Grow site. Water masters, cities or counties as well. Only verified individuals from the cities and counties can</p>	<p>Andre Ourso/Jeff Kuhns/Jesse Sweet</p>

	<p>call regarding an address. OMMP does not proactively provide information to law enforcement.</p> <p>*Report or Data to quantify what's coming out of Oregon, what's in the black market and the sources of the black market. I know there was an attempt earlier last year with the OSP report and heavy amounts of criticism on the accuracy of the report so, I think it would be good to see a report done better and people can agree on methodology as far as the accuracy of the data to get a better understanding of the magnitude of the problem in the state. Where the points are for the leakage.</p> <p>We need a comprehensive report on cannabis export in the state.</p> <p>Jeff is wanting to bring some data from OSP and HIDA.</p> <p>Existing participation in OMMOS and future participation on CTS tracking after July 1st.</p>	
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<p>Estimate of medical marijuana production</p>	<p>Get data on how much Medical Marijuana was produced in a set given time. Calendar year 2016 or 2017. Within agency OMMP</p> <p>Rough Estimate max number of plants based on people registered – allow policy makers at least one data point. You will have to make assumptions that people are using their max limit and about yield.</p>	<p>Andre Ourso/Jeff Kuhns/Jesse Sweet</p>
<p>Audit/random testing plan</p>	<p>OLCC, ODA and OHA have the legal ability to do random testing of product to make sure the product is up to state law standards. Currently have a private lab system that are accredited, licensed and all product must be tested in some form before it hits the market. We really don't have a check in this system, this random audit should involve a neutral third party. Someone who is not from the laboratory or a license or registrant. Tested by a lab that doesn't have any interest in the outcome of the tested product other than the safety of the consumer.</p> <p>Integrity checks on potency, a check on the data they are providing the public. And put a check on wholesalers and producers.</p> <p>Develop random testing for pesticides which would involve ODA</p>	<p>Andre Ourso/Jeff Kuhns/Jesse Sweet</p>

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<p>State Reference Lab</p>	<p>Having a state lab for failed pesticide cases holding product back and asking for it to be destroyed due to the lab results. It would be nice to have an independent reference lab to go back to validate that result.</p> <p>Consumers are choosing based on potency results, good bad or indifferent. This is driving a lot of pressure on labs to inflate potency results. This may not be as direct public safety issue as pesticide in product but I think it is an issue where we still are struggling with some lab compliance, so that's where I believe a reference lab could benefit.</p>	<p>Andre Ourso/Jeff Kuhns/Jesse Sweet</p>
<p>Public Comment</p>	<p>Sunnie Sanchez</p> <p>How many grow sites are in the cities and how many are in the counties. Are there any sanctions surrounding laboratories inflating results?</p> <p>Matthew Mendoza</p>	<p>Andre Ourso/Public</p>

	<p>Couldn't encourage you enough to ask for funding to keep myself and others safe from pesticides. It's critical in my option. And thank you, it's nice to see someone drive the train on this. I am glad it's important to you.</p> <p>Leah D'Ambrosio</p> <p>Hi Shannon, I just wanted to follow up on the email I sent to you on Monday. I'm not sure if you saw the news today that a 7th grader took edibles to school. If these edibles would have been marked with green crosses there is a chance someone would have seen them and prevented this from happening. We absolutely must do something now to stop accidental consumption.</p> <p>Here is the link to the article: http://kcby.com/news/local/girl-12-accused-of-giving-edible-marijuana-candy-to-other-students-at-springfield-school</p> <p>and</p>	
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<http://registerguard.com/rg/news/local/36667538-75/pot-laced-candy-shared-at-thurston-middle-school-in-springfield.html.csp>

Hopefully Andre or someone at the OHA will want to discuss how we can prevent accidents like this from occurring in the future. With more and more people bringing edibles into the home and more teenagers getting their hands-on edibles, we MUST mark them to make them easily identifiable.

Thanks so much for listening. Hope you have an amazing day!

wishing you all the best, Leah

Dear Shannon,

Thank you so much for taking the time to talk to me today about my desire to educate the OHA about the benefits of marking edibles to make them easily identifiable and to hopefully reduce if not eliminate accidental consumption. I hope that after reading the info below, the OHA will be encouraged to start this discussion.

Back in 2016 I started my own edible business, "Sconed", here in Portland, Oregon. We were making a traditional English toffee that looks EXACTLY like regular toffee. Before we went to market we wanted to make sure our toffee was easily identifiable as an infused product. We connected with a manufacturer that has been making bakery decorations for 60 years in Tacoma, Washington. They created edible green cross designs for us and that is what we used on our toffee to mark it as infused (see photo below).



As you can see from the photo, the green crosses stand out and cause people to take notice. They are made with sugar, cornstarch and food safe dyes and they do not change the texture or flavor of the toffee.

We chose to use the green cross on our food product as it is already being used in the industry to designate dispensaries and it is used worldwide as a symbol for medicine. What an easy educational tool for children - anything with a green cross means it has medicine in it and it will make you sick if you eat it. We understand this is not going to stop all children from eating a food product marked with a green cross, but we are certain that it will stop

most from eating it. And at least the ones that do can tell their parents that they ate the cookie with the green cross and now they are sick, eliminating the need for guessing what happened at a hospital. This is all about awareness!

As for adults, most of them intuitively know that my toffee is infused when they see the green crosses but even those that don't stop and question why the toffee is marked. The green cross starts a conversation which can then prevent accidental consumption.

Colorado took the necessary first step of mandating all edibles be marked, but the symbol they chose, the diamond with THC, does not stop children or most adults from consuming them. In fact, Colorado allows molds for candies and chocolates which makes the symbol even less obvious (picture below).

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Believe it or not, these candies have the Colorado universal symbol on them. As you can see it is not enough.

Some legal states have taken the first step in stopping accidental consumption by banning foods that are attractive to children like gummies in the shape of animals. But where does that stop? Children eat cookies and

	<p>brownies too - so should those be banned next? Of course not. We do not want people to have to smoke to get their medication. Edibles are one of the best ways to ingest cannabis.</p> <p>If all cannabis edibles were marked with a green cross, we wouldn't need to ban any food products. Here are photos of gummies both unmarked and marked with a green cross.</p>	
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As you can see, it is very easy to tell them apart. Once the green crosses are applied, they do not come off which makes them a great choice for marking gummies. And again, the flavor and texture are not changed.

As more and more people turn to cannabis for medicine, it is imperative that we do our best to protect both adults and children from accidental consumption. When I entered this business three years ago, it shocked me that there was no way to identify an uninfused brownie from an infused one and as someone who eats first and asks questions later that scared me. It shocks me that here we are a couple of years into legalization and nothing is being done to protect the public from accidental consumption. Labeling and packaging are not the answer- the food must be taken out of the package to eat it and when it is, there is zero way to know if it's infused.

In full disclosure, I started my company Baked Smart to create a way for edible companies to easily mark their food products but there are other ways to mark edibles available to companies. They can use printers, lasers

	<p>or other types of edible paper. The cost of marking edibles is not prohibitive. It costs a less than a penny to mark a gummy. Less than a penny to give a person time to realize what they are eating is an infused/medicated product.</p> <p>As more and more people turn to cannabis, we need to do something to prevent them from accidentally consuming cannabis. For people who are drug tested, accidentally consuming cannabis could cost them their job. Recently in New Mexico, a little girl unknowingly took medicated gummies to school and was suspended - and I'm sure traumatized by the incident. These are accidents that can easily be prevented by clearly marking edibles.</p> <p>Thank you so much for your time. Should anyone at the OHA wish to discuss this matter further, I would be happy to do so.</p>	
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	<p>Respectfully,</p> <p>Leah D'Ambrosio</p> <p>COO</p> <p>Baked Smart</p> <p>cell: 805-748-8983</p> <p>www.bakedsmart.org</p> <p>https://www.facebook.com/bakedsmartediblesafety/</p>	
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