

Thank you Chairman Jones and Committee members for allowing me to bring two brief but important concerns to your attention.

First: HB 4209 creates both a 5 member board within LARA, and an larger advisory committee to that board, to create rules and regulate the provisions of the medical marihuana legislation before you.

This package of bills, if enacted, becomes law 90 days after passage and the governor's signature.

If we properly understand the timeline for what is being proposed, is it even feasible for the governing board and the advisory board to first be appointed and then create the various rules and regulations required to properly allow the implementation of what is being proposed? Perhaps it would be wise to first allow for the creation of these boards and then give them ample time to formulate the proper structure for the regulation and enforcement of these bills.

Second: The bills discuss the equivalencies of solid marihuana vs. gaseous and liquid forms of useable marihuana. But they do not address the THC potency levels of any product. BHO (Butane Hash Oil) can be extracted that can achieve THC levels of up to 85%. While the public and law enforcement may be able to recognize the volume and weight of a product, visual observation cannot disclose whether a product is low, moderate or extremely high in THC content and potency.

Just like prescription medicines, the benefits and the risks can only be determined by a method capable of measuring the potency level of the THC a product contains. Perhaps this legislation should allow for our medical professionals to address suitable potency levels, dosages, and appropriate labeling and warnings on all marihuana products in order to protect the consumer and their families.

Dennis Van Dam
Ottawa County Commissioner
Member: West Michigan Enforcement Team Policy Board
(Allegan, Ottawa and Muskegon Counties)

NOTES:
HB 4209

Sec. 301. (1) The medical marihuana licensing board is created within the department of licensing and regulatory affairs. Together with a advisory board.

Sec. 302. The board has general responsibility for implementing this act. The board has the powers and duties specified in this act and all other powers necessary and proper to fully and effectively implement and administer this act for the purpose of licensing, regulating, and enforcing the licensing and regulation system established under this act for marihuana growth, processing, testing, and transporting.

The acts take effect 90 days after the date it is enacted into law.
From HB 4210

4 (C) FOR PURPOSES OF DETERMINING USABLE MARIHUANA EQUIVALENCY, 26 THE FOLLOWING SHALL BE CONSIDERED EQUIVALENT TO 1 OUNCE OF USABLE 27 MARIHUANA: 8 H00013'15 * (H-2) CJC 1 (1) 16 OUNCES OF MARIHUANA-INFUSED PRODUCT IF IN A SOLID FORM. 2 (2) 7 GRAMS OF MARIHUANA-INFUSED PRODUCT IF IN A GASEOUS FORM. 3 (3) 36 FLUID OUNCES OF MARIHUANA-INFUSED PRODUCT IF IN A 4 LIQUID FORM.