

HB132 Unfavorable
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I oppose HB132 and request the committee to report this bill as unfavorable.

The On-site Consumption concept originally was supposed to provide a safe place for residents of low-income neighborhoods to consume Cannabis when they were not likely to be allowed to consume in their own residences. We seem to have forgotten that need. This plan for on-site consumption licenses and events only serves the wealthy, but at least it won't work.

The Cannabis community has already been told that they can not hold BYOC events (e.g. Veteran's Initiative 22 Puff N Paint). This bill should ban counties and the ATCC from prohibiting such events.

Anywhere that tobacco can be consumed, Cannabis consumption should not be prohibited. The "second hand smoke" concern that MCA has offered for the reasoning behind prohibiting inhalation at events and on-site lounges completely ignores the original reasoning for this license concept. You can't easily tell from the MCA data dashboard what percentage of sales is for inhalation vs edibles, but it is easily in the 60-80% range. How is a business supposed to succeed when they can't serve half to 2/3 of their customers? This bill repeals "patio smoking" for onsite lounges. That was a hard-fought compromise that we will not give up. It is common sense.

This bill bans consumers from bringing their own Cannabis to events and bans them from taking any Cannabis they paid for at the event home with them. Who is going to enforce this and how? To borrow a phrase, this idea has problems coming and going. The state could not stop people from doing this when Cannabis was illegal. Putting the burden on event organizers is wishful thinking.

The proposed fee structure makes small events < 1000 people too costly. The proposed event fee for retailers equates to a maximum of \$2.50/ person attending the event whether they buy any Cannabis or not. That is highway robbery. The event fee should be based on event sales.

This bill allows normal edibles to be sold at large events. This virtually guarantees hospital visits because a large number of first-time users will be a certainty. Although this specific issue is easily addressed by regulation it is a red flag that the concept has not been thought through. Normal edibles have a 45-60+ minute onset time.

Experienced users will not pay a premium to consume onsite when they can consume at home and not feel the effects until the game starts versus not feeling the effects until the second half or on the way home. The effects of edibles can last 4-6 hours plus after onset. How many edibles sales at events are going to lead to impaired drivers leaving the event?

Dosing normal edibles is very difficult with onset times of 45 minutes to an hour. At 5mg doses, many people will need multiple servings to feel the effects. That's a recipe for people taking too much.

There are green waste concerns. Safe handling is going to be difficult, expensive and error prone. We should consider allowing consumers to take home partially consumed single dose Cannabis to reduce green waste.

This approach deviates from the alcohol model in that permits are issued at the state level instead of at the county level. I support moving the permitting process to the County level.

For all these reasons, it is clear that this concept needs more work before it can best serve the needs of the Cannabis consumer. There should be no rush to implement these proposed changes. Please report HB132 as unfavorable. We can do better.

Thank you,
Rusty Carr