



**Akamai Cannabis Clinic**  
3615 Harding Ave, Suite 304  
Honolulu, HI 96816

February 5, 2021

The Honorable Donovan M. Dela Cruz  
Hawaii State Capitol, Room 208  
415 S. Beretania Street  
Honolulu, HI 96813

### **CONCERNS ABOUT SB1139**

Dear Senator Dela Cruz,

I have some serious concerns about the management of the Office of Medical Cannabis Control and Regulation (OMCCR) that I wanted to bring to your attention.

[SB1139](#) recently passed out of HTH with amendments and is now eligible for a public hearing by the Senate Committee on Ways and Means (WAM), which is why I am contacting you. I believe that these concerns are relevant to the subject matter within WAM's purview because of the funding and staffing increases contained in this bill.

A major problem facing OMCCR is the lack of expertise on Medical Cannabis.

OMCCR is being administered by the Health Resources Administration ([HRA](#)), which does not have the capabilities to provide adequate regulatory oversight of the dispensary program. A more appropriate place for OMCCR would be within the Environmental Health Administration ([EHA](#)), which contains the Food Safety Branch, which is already performing the safety functions necessary to regulate dispensaries.

OMCCR also lacks a Medical Cannabis Advisory Board or any staff with experience or formal certification in Cannabinoid Medicine. The simplest way to remedy this situation would be to install a Cannabinoid Medicine Specialist in OMCCR.

I believe addressing these deficiencies will ensure that additional funding and staffing approved by WAM will be properly utilized. Thank you for taking the time to consider these concerns.

Aloha,

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