



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

January 17, 2021

Elizabeth A. Char, MD
Director, Department of Health
1250 Punchbowl Street
Honolulu, Hawaii 96813

MOVING OMCCR TO EHA

Dear Director Char,

After watching Peter Oshiro's recent comments during an [interview](#) for Cannabis Society of Hawaii's online channel, it is obvious that one of the major problems facing Hawaii's Medical Cannabis Program is the inability of the Health Resources Administration ([HRA](#)) to properly regulate dispensaries.

There have been several occurrences of mismanagement that I have pointed out in previous correspondence. These include allowing dispensaries to "remediate" moldy cannabis flowers for two years without statutory authority or administrative rules in order to reportedly appease dispensary owners who faced significant losses due to the slow rollout of department rules, failing to adopt rules that would regulate [hazardous](#) residual contaminants such as isopropyl alcohol and ethanol that are being introduced into remediated products, and turning a blind eye to the intentional violation of federal law by dispensaries that are importing cannabis seeds into Hawaii.

There is sufficient proof that HRA, for no fault of its dedicated hardworking staff who already have too many other responsibilities on their plate, does not have the expertise or resources necessary to adequately regulate Hawaii's dispensaries. I believe that the solution for this problem is to move the Office of Medical Cannabis Control and Regulation (OMCCR) from HRA to the Environmental Health Administration (EHA), which would allow regulatory oversight by the Sanitation Branch to be re-established.

Could you please tell me if you would support a statutory amendment to facilitate such a change during the upcoming legislative Session.

Aloha,

Clifton Otto, MD
cliftonotto@hotmail.com
808-233-8267.