

# Recreational Marijuana Program

## Compliance Education Bulletin

### Bulletin CE2025-01

January 14, 2025



The Oregon Liquor & Cannabis Commission (OLCC) is providing the following information to recreational marijuana licensees and hemp certificate holders.

The bulletin is part of OLCC's compliance education. It is important that you read it and understand it. If you don't understand it, please contact the OLCC for help at [marijuana.licensing@olcc.oregon.gov](mailto:marijuana.licensing@olcc.oregon.gov).

A [Compliance Education Bulletin](#) regarding Measure 119 was published on November 18 and updated on November 26, 2024. **This education bulletin is part two in the series and includes additional FAQs regarding Measure 119.**

- [Measure 119](#)
- [Labor Peace Agreement Attestation Form](#)

### Summary

Oregon voters recently passed **Ballot Measure 119**, requiring OLCC licensed **processors, retailers, medical only processors, medical only retailers, research certificate holders and labs** to provide the OLCC with a signed labor peace agreement (LPA) or [attestation](#) prior to licensure or renewal.

The new law went into effect December 5, 2024.

Any application for a license or renewal application or certificate in the categories listed above, received on or after December 5, 2024, will be required to include:

- A signed labor peace agreement entered into between the applicant and a bona fide labor organization actively engaged in representing or attempting to represent the applicant's employees; or
- An attestation signed by the applicant and the bona fide labor organization stating that the applicant and the bona fide labor organization have entered into and will abide by the terms of a labor peace agreement.

### FAQs

#### **I have no employees; do I need an LPA?**

- A. *Yes, even though you don't have employees, you will still need an LPA. Yes, M119 does not have an exception for applicants, licensees or certificate holders that do not currently have employees.*

#### **My employees say they have no intention of unionizing and don't want to. Do I still need an LPA?**

- A. *Yes. M119 does not have an exception for applicants, licensees or certificate holders whose employees state no intent to unionize.*

#### **How do I find a labor organization? I've been sending out inquiries and I'm not getting any responses.**

- A. *We cannot make recommendations for how you would contact a labor organization, nor does OLCC have a list of bona fide labor organizations. You will need to conduct your own search.*

**I found a labor organization, and I have a Labor Peace Agreement to sign, but there are sections within the LPA that violate OLCC rules, regulations and statutes. What do I do?**

A. *Applicants, licensees and certificate holders are required to follow all OLCC statutes and rules. A licensee or certificate holder will not be excused from potential disciplinary action by OLCC because it complied with an LPA. A licensee or certificate holder that complies with an LPA instead of OLCC statutes and rules does so at its own risk. OLCC is aware that some LPAs require a licensee or certificate holder to agree to permit union representatives to have access to all parts of a licensed premises. Licensees and certificate holders should keep in mind, these, and other OLCC Oregon Administrative Rules:*

- *OAR 845-025-1230: Licensed Premises Restrictions and Requirements*
- *OAR 845-025-1440: Required Camera Coverage and Camera Placement*
- *OAR 845-025-1450: Video Recording Requirements for Licensed Facilities*

**What If I don't submit an LPA or signed attestation with my license renewal?**

A. *Not submitting an LPA or attestation with your renewal application is grounds for OLCC to refuse to renew your license or certification. If you submit all other requirements for your renewal application but you don't have an LPA or signed attestation, OLCC will investigate and may issue you a legal notice proposing to refuse to renew your license or certification. If you submitted a timely renewal application, you are still allowed to operate until a final decision is issued.*

The OLCC will continue to update this bulletin as we learn more about the new law. If you have any questions, please send them to [marijuana.licensing@olcc.oregon.gov](mailto:marijuana.licensing@olcc.oregon.gov).