

The Entheogenic Practitioners Council of Oregon's Letter to the Oregon Health Authority Concerning Its Draft Rules on Psilocybin Products, Testing, and Facilitator Training

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The Entheogenic Practitioners Council of Oregon (EPCO) urges you to adopt the *Privileges and Duties of Entheogenic Practitioners* framework, which has received endorsement from the Equity and Licensing Subcommittees of the Oregon Psilocybin Advisory Board, and to create an entheogenic manufacturing endorsement.

EPCO's mission is to protect the respectful use of entheogenic plants and fungi by Indigenous, religious, spiritual, and contemplative communities. We support community access models of psilocybin services that protect sincere practice under Measure 109. We envision a future in which the traditional and communal use of entheogens is an honored and respected part of a healthy and diverse psychedelic ecosystem.

Many of our members have been involved in their entheogenic religious communities for decades. These communities have long histories of safely and responsibly working with psilocybin and other entheogens. We are excited for the opportunity to practice above ground, and we hope you will invite us into the Measure 109 program by adopting rules that respect our traditional practices and allow for affordable access. We believe our experience in working with psilocybin will be beneficial to Oregon as it embarks on this program, and we welcome an opportunity for partnership in this work. However, many of our members will not come above ground if the 109 program does not create affordable pathways of access and the freedom to safely practice in accordance with our traditions and beliefs.

Our members view the right to grow and handle their sacrament as a basic tenet of religious freedom and civil liberty. Many of our members who work with mushrooms see the mushroom as sacred. A majority believe that the mushrooms absorb the energy of the people who are around the mushrooms while they are growing. Some believe the mushrooms are

conscious beings. For many of our members who grow sacramental mushrooms, the act of growing mushrooms is a sacred act and is its own form of sacred practice.

Our members believe that there is something to be religiously or spiritually gained by taking mushrooms that have been grown and attended to by a person who has spiritual or religious intention. Many believe that interacting with their sacrament while it is growing is beneficial to both the person and the mushroom. Because of this, many of our members who plan to operate under Measure 109 believe that growing mushrooms in or near their sanctuary, temple, or practice area is an important aspect of their practice.

Our members' beliefs about mushrooms are varied and diverse. Many of our members who work with mushrooms have preferences for particular species. Some use different mushroom species for different purposes. Although we oppose any restrictions on the species of mushroom sacraments, we especially hope you will allow sincere communities to work with *Psilocybe zapotecorum*, *Psilocybe caerulescens*, *Psilocybe aztecorum*, *Psilocybe mexicana*, *Panaeolus cyanescens*, and *Psilocybe ovoideocystidiata* mushrooms.¹ The first four of these species have a long history of Indigenous use and a well-established safety profile; they have not been associated with so-called "wood-lover's paralysis." The safety risks of allowing these particular species, as opposed to *P. cubensis* only, are negligible.

We believe our work with entheogens to be a sacred calling. As members of EPCO, we are committed to the well-being of all people. Accordingly, we believe that psilocybin should be accessible to all people regardless of socio-economic status. Oregon's program must not over-regulate the psilocybin products of religious and spiritual communities in a way that

¹*Panaeolus cyanescens* is a species found in the Pacific Northwest that some of our member communities practice with because the use of local species reflects their community values. Some of our member communities have also exclusively used *Psilocybe ovoideocystidiata* and disfavor *Psilocybe cubensis*, and would have their religious practice burdened if forced to use only *Psilocybe cubensis*.

would render them unaffordable to the 520,000 Oregonians living in poverty. This includes imposing growing and testing rules that drive up the costs unnecessarily.

While some entheogenic mushroom communities voluntarily test the potency of their mushrooms, the vast majority do not. We are unaware of any entheogenic mushroom community that requires genomic testing (for species determination), potency testing, fungal/microbial contaminant screening, or heavy metals analyses of its sacraments. We are also unaware of anyone who has been harmed by their association with an entheogenic mushroom community because its sacrament had not been tested. In fact, we are unaware of any illnesses or deaths caused by contaminants or additives either within or outside of an entheogenic community, regardless of the species used. We also note that psilocybin mushrooms are virtually never tested in the unregulated market, and the harms that have occurred nearly always stem either from a lack of education or extreme risk-taking, neither of which are allowed under Measure 109.

EPCO and its members oppose any testing requirements that are not specifically addressed to particular harms that have been a problem in the unregulated market or that can be reasonably predicted to arise under Measure 109. Mandatory potency testing for every batch of mushrooms would also give economic advantages to large-scale grows and would make community-cultivated sacramental mushrooms financially prohibitive for many communities. Also, these tests, as written, may risk not accurately reflecting the potency of whole mushroom sacraments.

The most recent draft of the entheogenic practitioners framework (attached) proposes a reasonable solution to balancing safety with affordability and accessibility. The updated framework would require five of the six psilocybin testing types (all except solvent testing on extracts) to be performed only upon written request by OHA. We believe this is a small and modest departure from the testing rules as currently proposed by OHA, which already would require three of these five tests only upon written

request by OHA. For products produced with an entheogenic manufacturing endorsement, we simply propose to make this 5 out of 5.

We think the community access model for psilocybin services brings community safeguards that could safely handle the decreased precision that would come from these relaxed testing rules. We also think this will promote communities to grow their own mushrooms and provide them at lower costs and with less ecological impact.

Entheogenic practitioners who are serving their communities today continue to feel the historic pains of persecution, including our current prohibitionist system. The combination of criminalization and over-regulation of entheogenic practices forces communities to operate underground, where people are less likely to seek legal or medical assistance when needed.

Collectively, Oregon entheogenic practitioners hold centuries of knowledge and experience in the practice of psilocybin facilitation for healing and personal growth. They serve people in need of awakening and spiritual healing. Oregon's entheogenic communities are a resource to the State, particularly at this historic moment. Rather than continuing to be dismissed or ignored, they should be consulted in Oregon's rulemaking in a meaningful way.

Oregon is about to become the world's test case for equity in psychedelics. Affordable access to psychedelic healing is perhaps a wholly new equity issue that touches on racial, health, and spiritual equity. Equity means affordable access. Lack of affordability reinforces inequity that exists around race, gender, and class lines. We believe access to psychedelics to be a means of promoting spiritual equity, that we not create "spiritual privilege" as a function of socio-economic privilege. Equity also means culturally-sensitive. It must not impose Western medical paradigms on non-Western approaches to psilocybin.

We implore you to adopt the entheogenic practitioner proposal and create an entheogenic manufacturing endorsement. We know, through experience, that psilocybin services can be offered safely and affordably in a community access model like that which we have proposed. Therefore, we also know Oregon is capable of creating a psilocybin program that provides safe, affordable access in a way that respects religious freedom. We hope you will choose to do so.

Sincerely,

Jon Dennis, founding member of the Entheogenic Practitioners Council of Oregon