

Elizabeth Hayes  
Mercer  
LD 978

To the members of the Veterans and Legal Affairs Committee.

My name is Elizabeth Hayes, resident of Mercer and a medical cannabis caregiver. I am writing in support of LD978 An Act to Maintain Legislative Oversight of the Maine Medical Use of Cannabis Program by Requiring Major Substantive Rulemaking.

The proposed rules introduced by the Office of Cannabis Policy in early 2022 were evidence to me that they are not able to appropriately or effectively create a framework of rules and regulations to ensure patient access, success of caregiver businesses and public safety. A recent social media post by OCP on 3/14 laid bare their opinion of the medical industry as an under-regulated one. I have also seen this implied in a letter to Adult Use registrants referring to "unregulated and underregulated markets". Their clear bias against the medical program is why registrants and patients would like to see the legislature as a backstop against regulations that limit patients access to affordable medicine and stop small businesses and microbusinesses like my own from being able to succeed.

There have been many good faith efforts by the medical cannabis industry to meet with OCP and offer suggestions of how to address the concerns of the department regarding track and trace and testing. My own suggestion that we look to MOFGA Organic Certification protocols, which include record keeping requirements that enable a trace-back-audit to ensure there is no inversion of non-organic products, was met with dismissal. Vern Malloch told me that this suggestion had been brought up before, but it would not suffice as it was not updated in real time digitally. Someone present at the listening session who works in the shellfish industry spoke up to mention that in tracking shellfish through the supply chain, it is done effectively through paper record keeping and not instantaneous online connected platforms like Metric.

This is of note because shellfish carry a far more severe public safety risk than cannabis, with cases of paralysis and risk of death. We are seeking commonsense solutions to tracking and testing that are used in other areas of agriculture and food safety.

Having grown organic hemp under a program administered by the Department of Agriculture Conservation and Forestry, there is a drastic difference in the two programs, which both regulate cannabis sativa. In the hemp program we are working with regulators with a background in forestry, agriculture and entomology, whereas in the medical program we are regulated by current and retired law enforcement. We need continued legislative oversight to ensure the protection and preservation of our medical program, which in my estimation is the best in the country in regard to affordable, high-quality medicine for patients and equitable access to licensure for producers.

I thank you for considering my perspective and ask that you please vote ought to pass on LD978.