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LD 1847

I am writing in testimony in OPPOSITION of LD 1847

there is a difference between meaningful regulation and simply spending money to say we did. It is seen in numerous other states that METRC does not effectively prevent illicit sales as we see METRC brands and products even with METRC tags on them, floating around where they do not belong and where they allegedly are being prevented from ending up. There is nation wide coverage of the failed model METRC embodies and how it provides nothing but burdens and problems for the states currently using it.

Additionally, it is imperative that the conflict of interest between director, John Hudak and METRC is fully investigated prior to any further contracts being signed or tax dollars spent with METRC.

Total yeast mold testing that is not speciated lacks value in the data it provides . Due to the nature and lack of specificity involved in “total yeast mold tests” you could have 9,000CFU and pass, but all 9,000 could be harmful, pathogenic species. Or you could have 12,000 CFU and fail, but it could all be beneficial species like lacto bacillus, which exists naturally in our bodies and is commonly used by organic farmers to outcompete harmful species on leaf surface. Which means more chemical sprays and no natural, biological IPM methods.

Furthermore, to set a 10,000 CFU threshold when outdoor air has been tested as high as 50,000 CFU is just an illogical approach. This type of threshold would almost indefinitely prevent outdoor grown cannabis from making it to market . Other states have seen thresholds as high as 100,000 CFU . This should be the minimum threshold if we are to go by a total count rather than speciated .

Having to test every strain that is grown, will also become incredibly cumbersome from a financial perspective to small businesses . Many small farmers grow 7 to 8 different strains per Harvest and only yields one to 2 pounds of each strain . Having to pay for a \$505 test for each strain can take up to 40% of the Harvest value in testing costs . This would definitely mean that many small businesses would close and patients access to medical cannabis would be more limited.

If testing is mandated, a batch should be any amount of cannabis of any assortment of strain that is harvested from the same room at the same time. Truly though, labeling products as “tested” “non tested” or “remediated” would allow the consumer to decide what is best for them without disrupting the industry that has operated as it currently does for the last 30 years with no public health issues or negative impacts on the community .