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LD 104

I am writing in testimony in OPPOSITION to LD 104.

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 2 strains are both grown in the same room, harvested together and dried in the same space, if one is clean or dirty, the other will be as well. Plants are kept within inches of one another during these stages of production. Having excessive tests only increases financial burden and does not increase safety.

Language in this bill also mentions to be tested at “every change of hands. This alone is reason to oppose. If I test my harvest today and by the end of the week make a sale to a shop, the shop then needs to retest? 2 tests in the same week? This will not only lead to financial burdens but also inundate the limited testing facilities and cause a longer wait again for no increase to public safety. Large scale operations with ongoing product flow will always be at the front of the lab lines and small businesses with gaps between harvests will always be at a disadvantage waiting longer times for tests. Especially with a need for testing at every change of hands!

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 .