Hello,

I am giving my testimony to firmly oppose the passing of bill LD 1847. Much of this testimony is taken from my previous testimony in opposition of LD104, with exception of the first section on Perfluoroalkyl and Polyfluoroalkyl substances. As written, I believe this bill would cause irreparable harm to Maine's thriving medical cannabis industry, and I believe that it would put a heavy burden on myself as a small cannabis business owner. Here are several reasons why I believe this to be a poor direction to take Maine's medical system.

1. **Perfluoroalkyl and polyfluoroalkyl substances:** It is a well-known fact that PFAS contamination has largely spread through sludge which was spread over hay fields, then cultivated into crops which are fed to livestock. PFAS then spreads through manure which is used to cultivate crops, as well as the dairy products produced from these animals. If the dairy industry and other traditional farming industries and communities are exempt from PFAS testing requirements (as they currently are) despite being the primary source of this contamination, then it does not seem reasonable to require the cannabis industry to have this requirement. Especially so given that there is no currently accepted method of remediating for PFAS if it is found in the soil. Hydroponic growers may filter out PFAS from their water, but soil growers will have no available options to filter the PFAS from their compost or other amendments, which they require in order to cultivate their crops. In summary, I believe this requirement is inequitable given the treatment of other such industries, and would put many growers out of business due to the fact that there is no available treatment for PFAS contamination.

2. **Mandatory Testing**: Placing the expensive burden of mandatory testing upon the business (cultivator, dispensary, or caregiver) ultimately means that the consumer or patient will end up footing the bill. This will limit patient access and harm small businesses. Not to mention that in an already extremely competitive and cost driven marketplace, I do not believe that many would be willing to pay the substantial markup that they would have to in order to purchase medical cannabis. I am firmly in support of random "off the shelf testing" for contaminants at point of sale, and recalling products if need be.

3. **Cannabinoid profiles and Potency**: It is a known fact that cannabinoid percentages such as THC do not always correlate with potency. You can have a variety test at a modest 12% THC and yet have a devastatingly potent effect on a consumer, and in the same way you can have a 30% THC tested flower which will have a short lived or low potency effect. Terpenes may play a role in increasing certain effects, and lessening others. However, there is not much consistency as there is still much we do not understand about cannabis and the interrelations of all of these factors. Therefore potency testing does not guarantee the consumer or patient to know the strength of the product, and so should not be a requirement. Furthermore, potency testing is known to be flawed and is commonly used as a marketing tool in some of the larger markets in

the US such as in California. The numbers on the according labels are often manipulated by testing facilities in order to boost sales for their associated brands, due to the commonly held misconception that THC% guarantees a higher quality or more potent flower. Yet the market in California is struggling as it is overly corporatized and inundated with poor quality products, as well as over burdensome regulations which keep the higher quality products and mom and pop small businesses out of the marketplace. Therefore, mandatory potency testing for Maines cannabis is not recommended.

4. **Homogeneity requirement**: Homogeneity can never be guaranteed with cannabis flower, that is precisely what makes it enjoyable to consume. No two batches of the same variety will be exactly the same, whether in regards to potency, look, or flavor. Whether due to the farmer, the environment, or otherwise, no seasons crop will be identical. Therefore, I do not believe in any mandatory requirement for homogeneity" as it relates to cannabis products has any value as it cannot be guaranteed.

5. **Mandatory Electronic Inventory Tracking:** As a sole proprietor, I do not believe I could comply with this requirement as it is written , nor any requirement which requires consistent electronic tracking and logging tasks, such as through METRC. Therefore I feel such a requirement would threaten my ability to do my job and therefore harm my business. Requiring a program registrant to check in with the department every day to verify inventory is excessively burdensome. My business has no employees to do this sort of administrative busy work. A requirement such as this could perhaps be workable for small businesses assuming the check in frequency was altered to something closer to monthly, or quarterly. However, Maines medical system already has tracking in the form of Trip tickets which do log all changes in inventory as well as all transfers of product. Therefore this entire requirement seems to be redundant and unconstructive.

In conclusion, I firmly oppose the passing of bill LD1847 on the grounds stated above. Maine's medical cannabis industry thrives precisely because it is different and distinct from Californias, or Colorados, or Washingtons, or even Maines adult use industry. It provides the exact climate and framework in which small family businesses as well as talented individuals can take part, vend their unique products, and invest in their local communities. Folks come from all over to try Maines medical cannabis simply because it is that special. This is precisely what we want to protect, and I do believe that something will be lost or damaged by the passing of this bill.

Thank you for your time and consideration,

John Walker

Moonfrog Farm