

Senator Hickman, Representative Supica, and the distinguished members of the joint standing committee on Veterans and Legal Affairs,

My name is Lizzy Hayes, I am an organic farmer, medical cannabis caregiver and resident of Mercer. I am submitting testimony in SUPPORT of LD1567 which would disclose to consumers that their cannabis has been irradiated.

In the American food system, the FDA requires irradiated products to be labeled:

“The label and labeling of retail packages of foods irradiated in conformance with paragraph (b) of this section shall bear the following logo:



along with either the statement:

“Treated with radiation” or the statement “Treated by irradiation” in addition to information required by other regulations. The logo shall be placed prominently and conspicuously in conjunction with the required statement. The radiation disclosure statement is not required to be more prominent than the declaration of ingredients required under § 101.4 of this chapter. As used in this provision, the term “radiation disclosure statement” means the written statement that discloses that a food has been intentionally subject to irradiation.”

<https://www.ecfr.gov/current/title-21/chapter-I/subchapter-B/part-179/subpart-B/section-179.26>

I see no reason that cannabis consumers would not also be required to be informed about the use of irradiation on their cannabis. It is about transparency and as I understand there is a loophole that if cannabis is irradiated prior to mandatory testing, the Office of Cannabis Policy does not require it to be labeled.

I reached out to a toxicologist at Maine Board of Pesticide Control asking if these treatments are considered a pesticide and was told that BPC does not consider it a pesticide, it considers it a pesticide device which is regulated under EPA and directed me here [Pesticide Devices: A Guide for Consumers | US EPA](#)

Pesticide devices must be registered with the EPA and I support the language in LD1567 which requires this equipment to be inspected before use to protect the safety of operators and employees.

Use of these machines also has implications for interpreting a passing microbial testing panel as it allows material to pass that would otherwise fail microbial testing, which puts into question the point of testing for microbes at all. It allows folks with these machines to get their product to market with any level of microbes, but folks without must exercise meticulous and expensive sanitary protocols to pass testing without irradiation. It is my opinion that we should remove microbial testing requirements because they do not protect consumers from demonstratable harm, create industry incentives that prioritize lab shopping and irradiation, and limit access to outdoor grown flower.

Thank you for your time and consideration and I ask that you vote ought to pass on LD1567