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Lisbon Falls
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Maine State Legislature
Veterans and Legal Affairs Committee
State House – Room 437
Augusta, ME 04330
LD-104

Good Morning Senator, Hickman, Representative Supica, and distinguished members of the joint committee on Veteran and Legal Affairs. My name is Kimber Duncan and I live in Lisbon Falls. I am the general manager of a small medical cultivator in Southern Maine that also has a caregiver store. I am also a medical patient. I strongly OPPOSE this bill which would make it harder for the business I work for to operate, and it would make it harder for patients to purchase medical cannabis.

Testing in adult-use has batch size limits of 10,000 grams per batch of dry cannabis. That is about 22lb of dry material. If a cultivator's batch is 10,001g, they need to split this material into two batches and test each of them separately, doubling the testing cost. It costs approximately \$500 to test one batch for all the required items listed plus the loss of material being tested and the burden of travel time and gas. Adult-use operates, in general, with large batches, larger staff and larger prices per unit. Medical cannabis is usually "mom and pop" operations with a handful of staff members at best and harvest batches are usually smaller.

Additionally, there are only a handful of licensed cannabis testing labs in the state. The influx of samples would be a huge addition to their workload and their locations are clustered in southern Maine making it difficult for folks cultivating in northern Maine to access testing at all.

Tracking is something every business owner, regardless of their inventory, should do anyways. Every job I have ever worked at from food service to retail to business management have all required doing a version of inventory tracking and tracing product custody. The program already requires trip tickets which are VERY specific, plus most businesses already have Quickbooks and keep harvest logs in their records. This work is already being done, why do we want to pay for a program to make busywork for everyone? A predatory program like METRC is not needed or wanted for the Maine medical cannabis industry. I have worked extensively with METRC when we were operating in adult-use and it is terrible from a user perspective. It is not an intuitive program (it operates like DOS if anyone remembers that...), it is an absolute time-suck of a program with redundancies, and it provides terrible reports. Additionally, it gives people anxiety, and many people are scared to touch it. This is because every single button you push is an action you set in stone and cannot undo. The user manuals and training videos provided only show you how to do something and not how to undo anything or fix any mistakes. You need to call a call center to fix mistakes which sometimes takes hours or days and the people who help you are not from Maine and need to look up rules before they can help you. You need to go through approvals at METRC and sometimes OCP to undo a clerical mistake. Small operators rely on sales day to day and week to week to make their bills and not everyone is computer-savvy enough to never make a mistake ever. Administrative delays like this can be catastrophic and I am confident METRC cannot provide anything positive for the Maine medical program.

I am happy to elaborate on any points and answer any questions. Please reach out with any questions.

Best regards,

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