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LD 1567

Chairpersons and Esteemed Members of the Committee:

I respectfully submit this testimony in opposition to Legislative Document 1567, H.P. 1025, which proposes additional labeling requirements and regulatory hurdles for the use of radiation and ozonation treatment in adult-use cannabis.

I have worked in the cannabis industry for several years, as a caregiver, grow operator and in my position as head of drying and curing for my current employer. I do not name them because of the disinformation dominating the discourse around this bill.

To begin, from the American Cancer Society, regarding irradiation:

“Ionizing radiation can be used to kill bacteria and other germs on certain foods, which may make them safer to eat and help them last longer. Some people may be concerned that irradiated food may itself contain radiation. It’s important to understand that the radiation does not stay in the food. According to the US Food and Drug Administration (FDA), irradiating food does not make it radioactive and does not change its nutritional value, nor does it noticeably change the taste, texture, or appearance of the food."

https://www.cancer.org/cancer/risk-prevention/radiation-exposure/x-rays-gamma-rays/how-are-people-exposed.html

Irradiation is a widely used and in some municipalities required process both in the food and cannabis industries. The process is similar to using UV light or X-rays in a dentist's office: Energy passes through, kills microbes, and doesn’t remain in the product. Many everyday food products—including spices, grains, fruits, and meats—are routinely treated with ionizing radiation to reduce harmful bacteria and extend shelf life.

An argument for it’s use from the German market:

"Why is irradiation required in the first place? First of all, it is important to bear in mind that the cultivation of plants is a non-sterile process. In fact, basic regulatory principles require high and consistent quality of a product, which in the case of medical cannabis refers among other aspects to a low level of microbiological contamination. Herbal medicines such as dried cannabis flowers and extracts have to comply with official limits for microbiological contamination in oral or inhalation formulations. To assure that the therapeutic activity is not affected, limits or absence for different microorganisms have to be met.”

https://www.propharmagroup.com/thought-leadership/how-to-safely-launch-medical-cannabis-products-in-germany

We use irradiation to guarantee the safety of the product that we offer in the marketplace.

When I spoke to a friend in the dental world about this bill, they were astonished that this legislation was even being considered. Their immediate humorous response was to ask both if we were requiring people to stand in the irradiator to consume our product? And whether we will be introducing legislation mandating people who have had recent dental X-ray exams to wear a warning t-shirt afterwards? My friend summed it up this way: The process we use is basically the equivalent of us taking your weed to the dentist before offering it to you.

In closing, irradiation is an industry accepted and approved method for making cannabis products safer to use for everyone, especially those who may have weakened immune systems. Stigmatizing the use of irradiation is a disservice to both the

consumers, operators and regulators involved with needless, wasteful, fiscal consequences for all.

Hard science does not support this bill.

I urge the Committee to vote “Ought Not to Pass”.

Thank you for your work on this bill and for your time today.