

Trevor Spindler  
Limerick  
LD 104

Hello everyone, I am a small caregiver in the medical cannabis program strongly opposed to LD 104.

I'd like to start by saying I am shocked by the fact that it is 2025 and we are still listening to fear mongers and lobbyists. Special shout out to John Hudak who spoke who is currently under investigation for conflict of interest with METRC, while advocating for this bill that directly benefits METRC.

Anyway, There has been data cited today in testimonies about 42% of the medical cannabis products randomly tested by OCP failing for one or more contaminants. I want to emphasize that the 42% of what was tested was from a small pool of 120 randomly collected products by OCP. Of that 42% which is 50 samples, 26 of them failed for heavy metals/pesticides, the remainder of the "failures" were chalked up to mold & yeast. The mold, yeast and microbials standards that are being proposed are nonsensical. We are producing an agriculture commodity, which is covered in microbes that the labs cannot say whether they are dangerous for consumption after combustion.

This tested pool of 120 products collected and tested by OCP is not a proper representation of all the medical cannabis products available in the medical market. That small pool of products should not dictate or change the free market structure that we are fortunate enough to have. Further more in regards to bill LD 104, The testing facilities that are testifying directly benefit from these regulations.

Let me be clear, I am not opposed to testing medical cannabis. However, the inconsistencies between tests from the same exact product, lack of transparency and obvious coercion from these labs make it incredibly difficult for a small business to put trust and our money into these institutions. Our faith in them as a community has never been lower. If one lab gets one result and another lab gets a different one, then how can we legislate a law that is inconsistent on its base. There is no standard between the labs, if there was we would see consistent testing across the board.

I want to emphasize, we absolutely should discredit and abolish the fear mongers by asking them to show receipts to back up their outlandish statements. More often than not, individuals that cite children being in danger from unregulated cannabis cannot seem to provide substantial data that isn't anecdotal or procured by lobbyists.

This industry can thrive off free market principles. If the testing program was a opt in program, the free market of consumers will decide which brands they trust and continue to shop with. This is not something that should be regulated from the top down, but self policed within the medical industry.

Furthermore, I believe it is unwise and unfair to pass the current costs of testing onto the carevivers during an inflationary cycle. The costs associated with testing could not get passed onto the consumers without significant repercussions such as consumers turning to the black market for convenience. Small businesses would have to take the costs of mandatory testing and track and trace on the chin. and in a real life example, testing alone would cost my operation over \$20,000 annually. That money could objectively be better invested into my small business to stimulate the local economy. I as a business owner would much rather sure up my practices to ensure clean quality cannabis, and invest that \$20,000 into my business ventures, the community or my employees wellbeing. I opened my first medical caregiver retail store 2 years ago. Out of the thousands of patients we have served, we have only been asked two times if a product was tested and it was in regards to the terpenes and cannabinoids, not pesticides, heavy metals or mold/yeast.

LD 104 & LD 1847 would have a devastating negative impact on how we do business, the choice of variety to our customers and ultimately hurt the state and my local economy.

Reject this nonsense and continue to do better. This is a step in the wrong direction.  
Thank you for your time.