

Ryan Roy  
Raymond  
LD 1567

#### Written Testimony Opposing LD 1567 (H.P. 1025)

#### An Act to Require Labeling of Radiation Treatment and Ozonation of Adult Use Cannabis and Inspection and Registration of Associated Equipment

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 irradiation and ozonation treatment in adult-use cannabis.

Radiation and ozonation are science-backed, industry-standard methods of microbial remediation used throughout food and agriculture. They help ensure product safety and consistency and are already subject to strict quality control measures. LD 1567 proposes new layers of oversight without presenting data that these processes pose any unique threat in the context of cannabis. This type of regulatory overreach may undermine rather than enhance public safety.

Radiation and ozonation equipment act as a critical insurance policy—protecting both consumers and producers. In a tightly regulated environment where microbial contamination can result in costly product loss and public health risks, these technologies offer reliable, non-invasive, and effective solutions. They represent responsible manufacturing, not risky behavior. Treating cannabis with Ozonation or Radiation will also create a more shelf stable product that will keep microbial growth from occurring once packaged. Studies have shown no microbial growth in cannabis flower once irradiated after a year of being packaged. Without treatment microbial growth can occur over time creating a risk of product recalls during audit testing.

The proposed labeling mandate—requiring that cannabis products disclose if they were treated with radiation or ozone—risks misleading consumers. These terms, though scientifically accurate, are often misunderstood and can carry unnecessary fear or stigma. This is particularly concerning given that:

No other state in the U.S. currently mandates labeling for radiation or ozonation treatment of cannabis products.

By introducing such a requirement, Maine risks positioning its cannabis industry as an outlier, and its products as somehow inferior or dangerous—despite these being accepted and safe technologies. This creates an unlevel playing field and could harm consumer perception both locally and nationally. These technologies are used in every state that have testing requirements. Currently over 94% of regulated cannabis in Colorado is treated and not labeled

LD 1567 adds complexity by involving both the Office of Cannabis Policy and the Department of Health and Human Services in equipment oversight. Without clear jurisdiction and streamlined communication, this could lead to bureaucratic delays, inconsistent enforcement, and frustration among licensees. Currently, master level or higher Physicist from Physics Consultants, hired by the Department of Health and Human Services, inspect irradiation equipment each year for safety. This already costs operators of the equipment \$500 at each inspection.

Globally, many of the most advanced and highly regulated medical cannabis markets require the use of irradiation to ensure microbial safety and product consistency. This practice is not a sign of product deficiency, but rather a recognized international best practice—especially for products that must meet pharmaceutical-grade standards. There is no labeling requirement in these countries.

As the American Cancer Society and U.S. FDA explain:

"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."

Source: American Cancer Society

LD 1567 aims to increase transparency, but in practice, it adds regulation without necessity, amplifies stigma, and risks unintended harm to Maine's adult-use cannabis

market. No other state has adopted such labeling mandates, and doing so would isolate Maine operators and products from the broader, science-aligned cannabis economy.

We urge the Committee to vote “Ought Not to Pass” and instead support fair, evidence-based policy that promotes safety and public confidence.

Thank you for your consideration and service to the State of Maine.