Jimmy  Albrecht
Augusta
LD 1567

OPPOSITION TO LD 1567

My name is Jimmy Albrecht.  I have done extensive work in both the medical and recreational cannabis industry in both Colorado and Maine since 2017. I oppose LD 1567 because it would mislead the consumer's choices in regards to personal health.

I worked for the first company in Colorado to voluntarily test all material for both microbials and pesticides, Bonfire Cannabis & Concentrates. We offered extensive third party processing. Due to this, I had direct insight to the inner workings of many gardens. There is little to be hidden from a knowledgeable concentrate producer. At that time, many facilities were guilty of sample manipulation to pass testing if they could pass testing at all.

As regulations became more strict, all major successful companies I am familiar with went on to adopt ozone treatment machines in their facilities. Even the cleanest of facilities weren't able to pass testing without some form of remediation due to the state's strict standards. My former business partner worked with some of the most known solventless producers in the world. They still used ozone applications on all material they processed. Only the best facilities in the state had the financial capability to process material with ionizing radiation instead. It's what other companies strived to eventually achieve. It was recognized as a superior product and an industry standard worth working towards.

I have heard the argument that potential mycotoxins that were produced by pathogens or pests could remain with the flowers. My question to you is how do we create a product withe zero risk? The purpose of ionizing radiation is to guarantee we've done everything to our knowledge to not only satisfy the state's requirements but to also present product in it's cleanest potential form. Any remediation tool has potential for use to present a sub-par product to the consumer due to a lack of company diligence. The use of the equipment doesn't inherently reflect a lack of personal ethics and standards on the companies that choose to use it. It's similar to saying every grower that doesn't voluntarily pesticide test all their medical product is inherently misusing pesticides in their facilities.

If the concern is transparency, all companies both medical and recreational would be subjected to the same industry standards. I understand the nuance of small producers not realistically meeting some of the state's current requirements for Adult Use companies including testing for small batches of material. It's not financially viable to require them to do so. Will all medical cannabis be required to carry a label saying "This product has no required pesticide or microbial testing"? Does that fact indicate that all medical cannabis producers are guilty of product and consumer negligence? The consumer would unquestionably perceive it that way if it were presented in that manner on a label even though it isn't true. I consume medical cannabis. Some of the best flower in the country comes from the Maine Medical Program.

As a personal consumer, I am for both transparency and the elimination of bad actors in our community even at the cost of businesses. The language related to LD1567 doesn't directly assist either of those goals, it misguides customers. If it were of any health benefit, I don't understand why we would be the only state in the country to include this type of warning on the packaging when the equipment is used in cannabis businesses nationwide.

Please consider these perspectives when deciding what brings the public transparency and what casts doubt on lawful, thoughtful producers in both the medical and recreational markets.