

Re: LD 1488, An Act Regarding Cannabis Testing and the Manufacture of Cannabis and Hemp Products

Senator Hickman, Representative Supica, Members of the Joint Standing Committee on Veterans and Legal Affairs,

I would like to address concerns presented by the Office of Cannabis Policy in regards to this bill. OCP cites the precarious state of existing food safety within the meat, salad greens, and time/temp controlled food industries. Those industries have rigorous food safety requirements which are covered in every ServSafe course. Statute requires commercial kitchens to have at least one person who is certified in food safety. Cannabis edibles manufacturers are infusing shelf stable products such as gummies, candies, drinks, and baked goods. None of these food categories are high risk for time/temp contamination. Furthermore, if we produce a non infused gummy, candy, drink or baked goods in our commercial kitchen, OCP will not require us to test the non infused edible for microbials, water activity, or filth and foreign materials. Why are these tests not required on non cannabis edibles if OCP feels they are a needed test? By allowing co location of infused and non infused edibles, OCP has shown these mandatory tests for cannabis edibles are really not necessary. If OCP insists they are important consumer safety tests, shouldn't they advise DACF to require all food producers to test for microbials, filth, foreign materials and water activity? The stringent testing requirements were addressed in a previous bill, however, OCP chose to interpret the law change differently. For years, this emerging industry has been forced to incur high testing costs and many small companies have left the Maine cannabis industry because of this undue expense. With increasing business challenges, it is imperative that high testing costs for cannabis infused edibles are reduced to only test for potency and homogeneity.

In regards to co-locating hemp manufacturing with THC manufacturing, OCP has concerns about untracked and untested hemp. DACF monitors all hemp farmers in the state of Maine and they are regulated under the 2018 Farm Bill. We are also confused as many manufacturers are currently making products with both thc and cbd as an ingredient. It's okay to add cbd and thc as an ingredient but not cbd only? Why? Current vendors in the AU market are making cbd/thc infused drinks, gummies, and hard candies. OCP requires detailed operating plans for co-location of medical and AU, AU and non infused edibles, medical, AU, and non infused edibles so how is a co-location with a cbd manufacturing any different?

OCP is not protecting any consumers with these overbearing regulations. They are only making it difficult for small businesses to operate in this challenging industry. We are asking the VLA committee to recommend LD1488 ought to pass so small businesses like ours can continue to produce quality cannabis edibles to our communities and tourists in the great state of Maine. If you have any further questions, we would be happy to address the VLA committee. Thank you for your time.

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