Seed2Health Learning Health Alliance Testimony (Revised May 18, 2025)
LD 104_An Act to Protect the Health of Medical Cannabis Patients…
and LD 1847_An Act to Institute Testing and Tracking of Medical…

My name is Arleigh Kraus. I am the owner of a small organic vegetable and poultry farm and Windhill Organics, a medical cannabis company in Warren, Maine. Many of you know me through my work with the VLA and on other civic and policy matters.

I am speaking today on behalf of my fellow volunteer members of Seed2Health Learning Health Alliance regarding LD 104 and LD 1847.

Seed2Health is an open grassroots community of people who are re-imagining how to gather, learn from, and safely share knowledge through the lens of our common experiences with beneficial plants and health. As we help others and they, in turn, help us to understand what is working and what is not, we see a "pay-it-forward" approach taking shape for getting and staying healthy. We call this **learning health**.

Our collective perspectives are those of registered "patients" and "caregivers" in Maine's Medical Cannabis Program, academics and researchers, experts in learning health sciences, clinicians and pharmacists, and therapeutic formulators.

Our collaboration is supported by Seed2Health, LLC a company co-founded by Andrew Thacher in 2017 which is located at Tech Place in Brunswick, Maine. Andrew serves as the manager of the alliance and the services and innovations we are shaping to reduce the cost and increase the value of learning health and beneficial plants.

Next year, we are launching *Consensus 26* – a series of forums to engage broader community awareness and participation in shaping learning health consensus guidances. We hope these forums will bring together perspectives among three learning health communities: *Plant Health Balance*, *Member Health Balance* and *Learning Health Exchange*. Key to the value and growth within each community will be trusted and transparent product labels that connect them and the information they contain, including "whole plant" testing results.

Pertinent guidance topics we will be exploring within the *Plant Health Community* are *Balanced Testing* and *Connected Labeling*. Our focus is on risk-balanced testing, sampling, chain of custody, range-based reporting, untested products, audits, recalls, safe action limits, warnings, tiered pricing, inter-laboratory comparative testing, and online access to all results as published by testing labs for use with retail products.

These guidances will continuously evolve as we shape learning health understanding. Regarding testing, we see them also helping to reduce unnecessary tests and failures (driving market costs up and product quality down) while improving inter-laboratory testing consistency and overall program integrity.

It is with this understanding that we ask the committee to pursue deeper learning before legislating LD 104, LD 1847 and/or other bills regarding testing, labeling and learning in Maine's Medical Cannabis Program. The matters in these bills are complex and inter-connected. And the science informing them is dynamic and - frustratingly – often unsettled.

Specifically, we encourage the committee to consider the two following suggestions:

- Host a second testing education session for members of the VLA committee like the session held on February 13, 2023.
- Encourage and/or empanel a study group wherein program registrants and testing labs conduct a systematic review that brings together research and insight from subject matter experts on cannabis testing science. Along with Maine, every state desperately needs to know what such a study will reveal.

To refresh memories, the documents and recordings linked below describe two examples of pertinent learning in which members of the VLA committee and Seed2Health along with many others engaged in 2023 and 2021:

- The first document presents the written comments (see online version here) we presented at the VLA testing education session held in 2023. Recordings of all presentations made can be viewed at the following links: see Part 1 and Part2
- The second document (see online version here) presents excerpts and a link to the recording of the open forum on cannabis testing that Seed2Health hosted in 2021 among Chris Hudalla, Founder, Chief Scientific Officer of ProVerde Labs, members of the VLA committee, MMP registrants and our Seed2Health colleagues.

As before, we stand ready to help however we can. Only together will we realize the innovative approaches enabling all registrants to thrive. This is especially true for smaller and home-based caregivers who share valued guidance based on their experiences.

When we succeed, we anticipate large health and healthcare markets taking shape around all beneficial plants including cannabis. To get there, we must facilitate ongoing learning informed by trusted labels. When tested, the results should be open, accessible and helpful.

Respectfully,

Arleigh Kraus