Prepared by Paul T. McCarrier February 4 2026

Alternative Testing and Tracking Program for Maine's Medical Cannabis Program

Overview:

This program establishes a targeted, cost-effective approach to product safety and traceability in Maine's medical cannabis program. It leverages the existing mandatory trip ticket/portal system for tracking transfers and inventory records (as required under current law for proof of authorized conduct during transport and record retention). Contaminant testing starts voluntary to allow adaptation, then becomes mandatory after one year to phase in full compliance without immediate disruption to small caregivers. The focus is on essential risks only, supporting patient access while preventing contamination from illicit sources.

Mandatory Tracking Component:

Tracking uses the current trip ticket/portal requirements: Registrants maintain records of all transfers (from cultivation to sale/disposal), including batch numbers, sources, quantities, and chain-of-custody. Paper or digital trip tickets accompany transported products, with copies retained for four years. No additional expensive software (e.g., Metrc-style) is required.

Voluntary-to-Mandatory Testing Standards (Limited Scope):

Testing is restricted to the following analytes and product types only—no total yeast and mold, no PFAS, no other contaminants:

- Flower/trim (biomass): Pesticides and heavy metals.
- Oils/concentrates: Residual solvents, pesticides, or documentation linking to a passing test from the source biomass feedstock.

• Edibles (e.g., gummies, brownies): Potency (THC/CBD levels) and homogeneity (uniform distribution across units), tested per 10,000 units produced (or batch equivalent for smaller runs).
Labs must be Maine-accredited (e.g., ISO/IEC 17025 certified). Certificates of Analysis (COAs) are issued and must be shared between businesses (e.g., caregiver to dispensary) and tied to the registrant's registry ID number for verification.

OCP Audit Testing:
During routine annual inspections, OCP performs limited audit testing solely on products the registrant is currently producing or has in inventory. Audits are capped at one test per product type per inspection. If all audit tests pass, no additional testing is required in that inspection cycle. Audit results are linked to the registrant's registry ID in OCP records.

Remediation Process:
If a product fails testing (voluntary, transfer, or audit), registrants may remediate (e.g., re-processing oils to remove solvents, blending for homogeneity, or other approved methods) and re-test. Remediation must follow quarantine protocols to prevent distribution until passing results are obtained. Failed products may be disposed of if remediation is not feasible.

Med Safe Endorsement:
Participating registrants earn a "Maine Safe Med" endorsement upon meeting program standards (e.g., consistent passing tests and tracking compliance). Endorsements roll out as the program launches and are publicly listed on the OCP website for patient reference and marketing.
Implementation Timeline:
• Pilot Phase: Begins immediately upon the enabling law's effective

date, allowing voluntary participation and education.
• Mandatory Phase: Full requirements (testing + continued tracking) apply one year later, ensuring all medical cannabis products are tested where specified and tracked via trip ticket/ portal.
• Annual OCP reviews adjust based on data (e.g., contamination trends), with emphasis on education over penalties for first-time issues.
This streamlined program addresses patient safety gaps affordably, preserves small-operator viability, and builds on existing infrastructure while avoiding overreach.

Estimated burden: Minimal added costs beyond targeted tests, additonal labor costs for tracking and record keeping

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