



April 18th, 2023

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

**From: Alex McManis
Lewiston, Maine 04240**

Subject: Support of LD 1529

I am here today to testify in support of LD 1529.

This bill is a continuation of the batch tagging work last session. Batch tagging for plants became law in the fall of last year (although it still hasn't been implemented yet by OCP). Batch tagging of products was part of the initial bill, but it got removed in order to push plant batch tagging through. This was done with the understanding that OCP was going to implement batch tagging for products on their own which has not happened. OCP did finally release details on their new plan for batch tagging last week, after finalizing the contract renegotiation with METRC, before running their idea by the industry or the legislature.

I'm sure we will have plenty of time to get into the weeds on that, so for my testimony I will focus on the logic behind batch tagging for products and the lack of logic behind batch tagging individual products.

I own a small market at Sunday River that carries snacks and groceries. We order products from many vendors, and I'm going to use one as an example: Capital Candy. Our typical Capital Candy order during ski season has about a hundred skus including cheese, crackers, tobacco products, juice, you name it. When we receive our Capital Candy order for the week, it comes with a few yellow pieces of paper stapled together that itemize the shipment. Every individual sku is not tagged. It would be pretty ridiculous if they were. Sometimes we get cases of things, but sometimes not; for example, we might only get 3 units of finger polish remover. Instead of tagging individual batches of items, businesses in the modern world simply include all of the necessary information on the delivery manifest. Then, in the event of a recall, they pull the information required to complete the recall from their internal system.

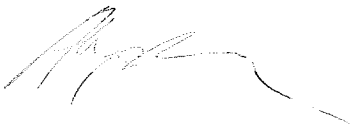
This may be so obvious to everyone that I may seem to be wasting your time. That is of course not my intent, rather my intent is to point out that the cannabis industry, both operators and regulators, can quite often be caught attempting to reinvent the wheel. This is one of those scenarios. We are reinventing the wheel here. Frankly, our entire track and trace system is a reinvention of the wheel. Except instead of shaping it like a circle, for some reason we've shaped it like a dodecahedron. It sure is complex, but it just doesn't roll right.

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This bill is a step in the direction of a circular wheel. I implore the legislature to use this session to carve the dodecahedron that is our tack and trace system (and really our entire regulator system) into the tried and true circular shape of a wheel.

Metrc isn't going to like it. But should Maine State policy be dictated by a Florida based software company?

Sincerely,



Alex McMahar,
The Healing Community MEDCo