

Honorable Chairperson Senator Craig Hickman, Honorable Chairperson Representative Laura Supica, and the entire honorable Veteran's and Legal Affairs Committee, my name is Avi Ruimy and I support LD 2147. I've been a Maine medical caregiver since 2017 and have a manufacturing facility for both medical and adult use cannabis products.

Due to OCP guidance over the recent months, we have had to cease coating our adult use gummies in sugar. While this allows for the THC logo to be clearly read, in the event the consumer did not notice THC content from the compliant packaging, the lack of sugar greatly affects product quality and we have seen a direct correlation between this change and product sales.

Our THC tablets are made with a pressed powder, clean of any contaminants, pesticides or other harmful materials, yet they're sitting on a shelf unable to be sold until we can produce a custom-made pill press to incorporate the THC logo. Further, OCP provided feedback on our proposed new tablet regarding pill size and logo size, and we remain concerned that the new required size of this product will affect sales.

Aside from the impact on sales, these changes and updates to packaging and products cost us greatly. We design all of our own custom packaging and order large quantities to justify the cost of shipping as well as maintaining a competitive price on the market. The collection of unusable packaging we have accumulated over the years is unfortunate.

Countless measures are taken throughout the manufacturing and retail distribution process to ensure that products are tamper proof, child resistant, and packaged in a manner which states the product's THC content. If the packaging is held to such tight compliance guidelines, which have also cost us over the years in keeping current with ever-changing regulations, it seems redundant that the product inside the packaging must also have a THC logo stamped or molded into it.

For a minor to be accessing any product distributed and sold in compliant packaging, the consumer purchasing the product or any individual along the product's chain of custody would have had to breach OCP rule in doing so, either by storing the product outside of its packaging or otherwise rendered in some accessible form.

We ask that OCP reconsider the requirement that adult use edible products contain a physical "Contains THC" on the direct food item. Adequate measures are in place to guarantee only individuals above 21 years of age can purchase our products on the adult use market, we feel any marking on the food item itself to be costly and unnecessary.