

Good morning, Director Hudak and Staff:

My name is Cynthia Soma- Hernandez, Secretary for the Maine Cannabis Union and Retired Educator.

I should like to address the issue of Identifiers on Cannabis products.

The letters CRC are known as a Child Resistant Container. It is a legislator's job to make legislation make sense. I'd like us to think for a moment about laundry detergent pods. A high number of calls to The Poison Control Center were made a decade ago reporting ingesting of detergent pods by small children.

After consultation and discussion with United States Congressional legislative bodies and industry experts it was determined that Child Resistant containers, or CRCs were the best solution. No additional markings on the pods were deemed effective. They did not have to change their pod packaging.

Detergent manufacturers did, however, have to sell the pods in Child Resistant Containers, CRCs. The ingestion of these products were a genuine threat to Health and Safety of children. Cannabis is not life threatening. Although Cannabis is not life threatening this particular legislation appears to be nothing short of industrial harassment.

The question really is do Identifiers prevent consumption by children?

What would be a reasonable solution that we could offer to the Department, to the Office of Cannabis Policy?

People legally purchasing Cannabis buy Cannabis from Registered Caregivers either at a storefront or via the Caregiver. These are licensed facilities and individuals.

A reasonable solution would be to put an educational pamphlet inside the purchase bag stating the importance of keeping the product away

from children in its Child Resistant Container, CRC. As an Educator, I can vouch for the vital importance of Public Education and of Public Service Announcements.

Every Halloween, Public Service Announcements are made informing parents of the possible dangers to their children when eating unwrapped candy. This was deemed the appropriate action needed for parents. What was not deemed necessary was wrapping individual pieces of gummies, nor the marking of individual gummies.

We, the people are the Legislative body's gatekeepers. It is our duty to be aware of proposed legislation as well as it is our duty to reject overreach and unnecessary legislation.

It's important for us to keep our heads about us and not let the legislature get carried away making unnecessary legislation that cripples industrial development in the Cannabis Industry.

Two key messages should be circulated in the community. First, don't leave cannabis products laying around. Secondly, educate the public consistently. Posters in the shops would serve well.

What is the purpose of identifiers on pills? The number one purpose is so that you dispense the proper item. The secondary purpose is poison control. And this is within the pharmaceutical industry. The identifiers are not to prevent people from taking the wrong thing.

A decade ago, when supplements switched over to gummies it was determined that supplements could be dangerous if eaten like candy by children. Now, generally speaking, a child 5 to 6 years old is too young to understand the identifying markings. It was resolved that Child Resistant Containers, CRCs could prevent the harmful effects of a child overeating vitamin gummies.

As a result, Child Resistant Containers, CRCs were the solution. Federal regulations noting that nothing else would make a difference. There's a track record. There is no documentation that imprinting gummies, or capsules will deter a child's determination to consume gummies NOT contained in a Child Resistant Container.

It's not done with vitamins, and it's not done with pharmaceuticals for any other purpose than for The Poison Control Center to ascertain danger. Ten years ago, manufacturers of gummy multivitamins resolved that issue.

The Vitamin Supplement Companies recognized that the ingestion of large amounts of some of the ingredients could be injurious to children. The manufacturers of the gummy multivitamins had concerns similar to those of our legislature.

In consultation with the Food and Drug Administration, it was deemed adequate to use Child Resistant Containers, CRCs unlike the proposed legislation which would require individual gummies and capsules to be imprinted.

At that time, it was determined that a child too young to understand (under six years old) could try to access the contents in a matter of five to six minutes to figure out how to open it. That's the amount of time that it generally takes a child that age to open a Child Resistant Container, CRC. The FDA determined that a young child should not be left unattended for longer than 10 minutes.

Medication bags are only a delay tactic. It's not an industry safety standard. The industry standard is a Child Resistant Container, CRC. Not a locked container, AND CERTAINLY not imprinting gummies and capsules.

There's such a thing as a risk/benefit ratio. What is the risk? What are the negative aspects? Therefore, if it doesn't mitigate the risk, then why do it? What is the benefit? It's overkill unless there's actual documentation. You can't legislate for something imaginary and you can't legislate imaginary scenarios.