

Good morning esteemed committee members.

My name is Aaron Scalia and I own and operate AAA PHARMS in Manchester Maine. We are an Adult Use Cannabis Grow, Manufacturing and Retail facility.

I speak today in support of LD 104, and any other legislation that requires the testing and tracking of medical cannabis.

In 2020 I converted my MMJ Caregiver license to Recreational. I was a Medical Marijuana Caregiver from 2015 to 2020.

In 2017 my team and I opened AAA Pharmaceutical Alternatives in Manchester ME. We were located beside Dr. Dustin Sulak in the Merry Meeting Plaza.

Even though testing is not required in the medical program, in order to serve Dr. Sulak's patients we tested all our products. He stressed the importance of testing and proper dosing.

AAA has always been a strong supporter of testing. We at AAA believe anyone who uses cannabis whether it's medical or recreational deserves the transparency of knowing what they're putting into their bodies.

In 2020 AAA PHARMS was established. Over the last 5 years we have operated as an Adult Use Cannabis Company. We still serve a number of MMJ patients, and a common theme in seeing them is getting quality, reliable, tested products.

In fact, on the OCP website, you can find a list of adult use products that have been recalled. In a program that requires stringent controls and testing like adult use to still have failure is a testament to the highly sensitive nature of the plant. I am very familiar with how hard it is to cultivate clean, compliant Adult Use cannabis, and yet there still can be problems. Do you honestly think the medical product is better or worse? How would you know?

In their August 2023 audit, OCP tested 120 random medical samples from caregivers and dispensaries. Of the 120 samples, 50 failed the same tests we are regularly required to pass. That's 42%. You continue to reward the wrong behavior.

For years we have been astounded to witness the regularity in which any proposed changes to the Medical cannabis program were systematically struck down, stonewalled and even slanted in favor of the Medical folks.

The current lack of any meaningful control measures in the medical program has allowed for an oversaturated and unsafe medical market, drastically affecting product value. This has resulted in an erosion of both medical and Adult Use markets in similar fashion as has been seen in California and Colorado.

The inability to manage illicit and overproduced product has resulted in a manufactured crisis, and both programs have needlessly suffered. The rapid devaluing of the cannabis market over the past few years has accelerated at an alarming rate. We had plans to expand our business this year, but with the market trending as it is; we have put those plans on hold.

If the playing field was level, market forces would dictate product value, success and failure. The net result of current policies is leading directly to handicapped competition, stifled growth, lost tax revenues and a significant liability to the safety and viability of both programs.

As I offered before, in no possible scenario would the state allow anyone to pay a fee and make their own “medical moonshine” then set up shop next door to an Agency liquor store (for any of 100 good reasons). Yet this is the current business climate in which we as Adult-Use businesses are forced to compete.

If safety, liability and overproduction are not enough reason to change the medical program rules, I would think the state could use the extra revenue from a properly run cannabis program. Adult-Use already contributes a disproportionate amount of the “Fund”; and I strongly oppose any legislation that offers medical compliance with Adult-Use funds.

In an era where most cannabis consumers still do not realize that the Medical cannabis they use to support their health is not tested and is not tracked, the potential liability and damage to both programs could be catastrophic.

We are no longer in a position where doing nothing to the Medical Cannabis program is an option. I urge you to support the addition of track & trace and mandatory testing to the medical cannabis program. Just these two initiatives will go a long way toward solving many of the serious flaws in the program.

Can anyone give me a good reason why we are still having this debate? How has this not been addressed? How can anyone in good conscience be opposed?

The lack of any meaningful change has led directly to the critical problems we now face.

Thank you,

**Aaron Scalia**

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# Harmful Contaminants in Maine's Medical Cannabis Program

*Findings from the Office of Cannabis Policy's August 2023 audit testing of Maine medical cannabis and cannabis products*

## Findings

Samples were collected from:

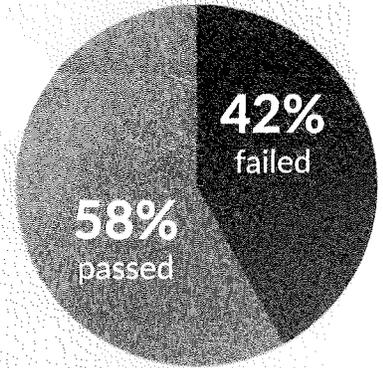
**112**

Registered  
Caregivers

**8**

Registered  
Dispensaries

**50** out of **120** medical cannabis samples contained at least one contaminant that would have failed testing according to Maine's Adult Use Cannabis Program testing standards.



**12** samples failed testing for more than one contaminant, and **5** failed testing for multiple contaminants within a given analyte category. Overall:

- » **30** individual samples failed for yeast & mold (25.0% of all samples)
- » **21** individual samples failed for pesticides (17.5% of all samples) (**26** failures in total)
- » **3** individual samples failed for heavy metals (2.5% of all samples) (**4** failures in total)
- » **1** individual sample failed for filth & foreign materials (0.8% of all samples)

### Testing Facilities

Maine has **five** certified cannabis testing facilities (CTFs) that are:

- ✓ Licensed by Maine's Office of Cannabis Policy (OCP)
- ✓ Certified annually by Maine's Center for Disease Control & Prevention (CDC)
- ✓ Accredited by an independent, third-party accreditor using ISO/IEC 17025:2017 standards
- ✓ Equipped to test medical cannabis in Maine as they do for the adult use program

### Policy Challenges

Implementing mandatory medical cannabis testing is but one part of protecting Maine's **106,000+** medical cannabis patients.

Absent an **inventory tracking** system and changes to the **confidentiality protections** for registrants in Maine's Medical Use of Cannabis Program, the impacts of such mandatory testing are limited at best.

Maine's medical cannabis patients deserve a comprehensive solution that **prioritizes their safety**.