Hebert, Michelle

From: Olson, Rachel
Sent: Wednesday, May 7, 2025 12:56 PM
To: Legislature: Committee on Veterans and Legal Affairs
Cc: James Dube
Subject: FW: (James Dube-Lebanon-Caregiver and Patient)

Additional testimony. See below.

Rachel Olson
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From: James Dube <qccanna@gmail.com>
Sent: Wednesday, May 7, 2025 12:54 PM
To: Olson, Rachel <Rachel.Olson@legislature.maine.gov>
Subject: (James Dube-Lebanon-Caregiver and Patient)

To Rachel Olsen,

Per Senator Hickmans request, I am sending along a few key points that need to be addressed during the work session and for your analysis of the proposed legislation. My concerns stem around the lack of information or guidance within the legislation regarding fresh frozen whole plant material and how to determine a process for that, considering it has been fully overlooked in both L.D. 104 and L.D. 1847. As well as testimony given on PFA testing and the suggestion of a DNA based tracking system by Dr. Sherman Hom. All have significant shortcomings and issues with real world implementation.

I also ended up speaking on Marinol (synthetic THC known as Dronabinol) as the pharmaceutical companies answer to whole plant medicine. I have patient information directly relating to the administration of this drug as well as its current status and scheduling from the DEA. I also have information on its availability here in Maine or lack thereof, and why a patient prescribed this medicine by a medical doctor would need to seek out an alternative within this market. Ironically being given this direction by the very pharmacist who is supposed to have the drug on hand.

I also touched on why L.D 1847's testing for forever chemicals in the product (PAFS), while subsequently requiring adult use gummies to be packaged in blister packaging is hypocrisy. In most cases especially in the thermoform version of those materials PAFS are present, so again this becomes a contaminated packaging issue rather than a contaminated product issue. I have information that may be helpful in the work session on how Europe has dealt with and continues to deal with this issue and how we need to look more into whether the contamination stems from the product or contaminated packaging. It also outlines that these chemicals are present in "stoppers, plungers and seals" which exist in most if not all the vape hardware that is on the market. All issues that must be considered before or within the work session. In addition to this I have an open conversation with the manager Lorri Maling of Nelson Analytical

about the non feasibility of testing for these forever chemicals. I subsequently found out that not one lab in Maine is currently capable of even testing for these analytes, water is the only current substance they can test for PFAS so these requirements would be impossible to even attempt to attain. Putting people outside of compliance until a state run lab can get the necessary devices, and training to try to test for these chemicals. It was pointed out that this would literally be millions of dollars for each lab. As well as an estimated amount of greater than $350 per sample for that analyte alone (this is the current cost for a water test for PFAS, the estimation is it would be a greater cost to test a non liquid for these chemicals resulting in an even higher price for said test).

A testimony was also given by Dr. Sherman Hom of Medicinal Genomics on how speciation testing for yeast and mold would be more effective in determining if a sample contains harmful or benign yeasts and molds. I think that is a great idea and I fully stand behind being much more specific in making sure we are testing for harmful analytes and not those that have no negative effect on public health. I do think it is worth noting that Dr. Homs company Medicinal Genomics is the manufacturer of these tests and he has vested interest in the adoption of these methods. I believe this would subsequently hurt the testing labs in Maine as they would have to get the testing products through Medicinal Genomics which would enrich that company significantly. I am all for these much more specific tests. I just believe it should be Maine labs that benefit from the program rather than a large out of state lab. Hom also proposed a different track and trace method he called "The DNA fingerprint model". This would take a dna snapshot or fingerprint of each plant so that if a diverted or contaminated product was found the dna of that product could be traced back to the source. Although sound in theory the application of these would not give as clear information as presented. A clone is a genetically identical copy of the plant it has been taken from. We are in a market where high quality genetics circulate between many different producers, but if all of them were tested at the dna level they would all be identical copies of each other regardless of the garden they came from. A clone could be put into 5 different gardens, then put into the market, and if we test for DNA alone to trace this individual we would find that they are all identical. So this is an impossible tracking method in a market that has any sharing of genetic material. It would be impossible to figure out which garden the DNA in question came from due to its existence in multiple places. It is also worth pointing out that the product used for this type of sampling is also sold by medicinal genomics under the name SenSATIVAX DNA Purification Kit. This is again another direction that would enrich that company through the adoption of their proprietary methods and kits.

Lastly, within my notes on L.D. 104 and L.D. 1847 it is worth pointing out that an entire category of how the plant is prepared pre extraction, with or without inherently hazardous substances has been missed. There is no provision for fresh frozen whole plant flowers. Arguably the most medicinal, highest quality version of the plant. This becomes an impossible product to test due to the fact it must be frozen immediately after harvest. By immediately I mean within hours to prevent degradation of the flowers before they naturally break down from being cut. I am intimately tied to this process because it is my area of expertise within this market. If I can be of any assistance in the following days, weeks or within the work session, I can make myself available.

Thank you for your time,
James Dube
508-843-2750