



Senator Hickman, Representative Supica, and Distinguished Members of the Joint Standing Committee on Veterans and Legal Affairs,

My name is Michael Saxl, I am a resident of Belgrade, Maine, serve as Managing Principal of Maine Street Solutions, and am outside counsel to the Maine Cannabis Industry Association. The Maine Cannabis Industry Association opposes LD 1567, *An Act to Require Labeling of Radiation Treatment and Ozonation of Adult Use Cannabis*. Our opposition is based in a few practical realities:

- There is no scientific evidence demonstrating that these decontamination processes pose health risks to consumers. To the contrary, use of this process is widely used for many common consumables to make their consumption safer. According to the FDA, "Irradiation does not make foods radioactive, compromise nutritional quality, or noticeably change the taste, texture, or appearance of food. . . Food irradiation (the application of ionizing radiation to food) is a technology that improves the safety and extends the shelf life of foods by reducing or eliminating microorganisms."<sup>1</sup>
- According to the National Institutes of Health<sup>2</sup>, use of the word "radiation" creates a "stigmatization" which undermines public confidence without a public understanding about the health benefits. There is a widespread panic driven by media "about real radiation injuries, (such as) fear of nuclear weapons or dirty bombs [1], Chernobyl [2], and. . . (or even) comic book characters such as Spider Man and Teenage Mutant Ninja Turtles. The resultant "radiophobia" needs to be recognized and properly managed."<sup>3</sup> To be clear, the radiation used in treating cannabis is not radioactive and in fact protects consumers from dangerous contaminants.
- Maine's mandatory testing thresholds for mold and microbials are very low in the adult use cannabis program.
- We believe that this labeling would result in consumers in the adult use market developing an unwarranted stigma. The adult use market already must compete with the illegal market and the newly emerging "hemp THCA" flower market, where there are no testing or labeling requirements. Products outside the regulated adult use program are much more likely to be unsafe, but there are no consumer protection regulations to inform consumers of that.

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<sup>1</sup> <https://www.fda.gov/food/buy-store-serve-safe-food/food-irradiation-what-you-need-know>

<sup>2</sup> <https://pmc.ncbi.nlm.nih.gov/articles/PMC3816522/>

<sup>3</sup> <https://pmc.ncbi.nlm.nih.gov/articles/PMC3816522/>

If we were presented with verifiable scientific evidence that these treatments pose a risk to consumers, we would feel differently. But the adult use market is already fighting multiple illegal and quasi-legal markets with one arm tied behind our backs. We don't need to unnecessarily stigmatize the most regulated, tested, tracked and safe marketplace for cannabis in our state.