

Hebert, Michelle

From: Ryan Roy <ryan@jarcannabis.com>
Sent: Friday, May 2, 2025 6:21 PM
To: Hebert, Michelle
Subject: OPPOSITION To LD 1567
Attachments: PCI Consultants LD 1567 Letter.pdf

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This message originates from outside the Maine Legislature.

Dear Michelle Hebert

Thank you for your ongoing support of the cannabis industry. Below is my written testimony as I strongly oppose LD 1567. I've also attached a letter from Ryan, a Physicist at Physics Consultants who is hired by the State to inspect our equipment every year for safety. Please let me know if you have any questions or concerns.

Written Testimony Opposing LD 1567 (H.P. 1025)

An Act to Require Labeling of Radiation Treatment and Ozonation of Adult Use Cannabis and Inspection and Registration of Associated Equipment

I respectfully submit this testimony in opposition to Legislative Document 1567, H.P. 1025, which proposes additional labeling requirements and regulatory hurdles for the use of irradiation and ozonation treatment in adult-use cannabis.

Radiation and ozonation are science-backed, industry-standard methods of microbial remediation used throughout food and agriculture. They help ensure product safety and consistency and are already subject to strict quality control measures. LD 1567 proposes new layers of oversight without presenting data that these processes pose any unique threat in the context of cannabis. This type of regulatory overreach may undermine rather than enhance public safety.

Radiation and ozonation equipment act as a **critical insurance policy**—protecting both consumers and producers. In a tightly regulated environment where microbial contamination can result in costly product loss and public health risks, these technologies offer reliable, non-invasive, and effective solutions. They represent responsible manufacturing, not risky behavior. Treating cannabis with Ozonation or Radiation will also create a more shelf stable product that will keep microbial growth from occurring once packaged. Studies have shown no microbial growth in cannabis flower once irradiated after a year of being packaged. Without treatment, microbial growth can occur over time, creating a risk of product recalls during audit testing.

The proposed labeling mandate—requiring that cannabis products disclose if they were treated with radiation or ozone—risks misleading consumers. These terms, though scientifically accurate, are often misunderstood and can carry unnecessary fear or stigma. This is particularly concerning given that:

No other state in the U.S. currently mandates labeling for radiation or ozonation treatment of cannabis products.

By introducing such a requirement, Maine risks positioning its cannabis industry as an outlier, and its products as somehow inferior or dangerous—despite these being accepted and safe technologies. This creates an unlevel playing field and could harm consumer perception both locally and nationally. These technologies are used in

every state that have testing requirements. Currently over 94% of regulated cannabis in Colorado is treated and not labeled

LD 1567 adds complexity by involving both the Office of Cannabis Policy and the Department of Health and Human Services in equipment oversight. Without clear jurisdiction and streamlined communication, this could lead to bureaucratic delays, inconsistent enforcement, and frustration among licensees. Currently, master level or higher Physicist from Physics Consultants, hired by the Department of Health and Human Services, inspect irradiation equipment each year for safety. This already costs operators of the equipment \$500 at each inspection.

Globally, many of the most advanced and highly regulated medical cannabis markets **require the use of irradiation** to ensure microbial safety and product consistency. This practice is not a sign of product deficiency, but rather a **recognized international best practice**—especially for products that must meet pharmaceutical-grade standards. There is no labeling requirement in these countries.

As the **American Cancer Society** and **U.S. FDA** explain:

"Irradiating food does not make it radioactive and does not change its nutritional value, nor does it noticeably change the taste, texture, or appearance of the food."

Source: American Cancer Society

LD 1567 aims to increase transparency, but in practice, it adds regulation without necessity, amplifies stigma, and risks unintended harm to Maine's adult-use cannabis market. No other state has adopted such labeling mandates, and doing so would isolate Maine operators and products from the broader, science-aligned cannabis economy.

We urge the Committee to vote "**Ought Not to Pass**" and instead support fair, evidence-based policy that promotes safety *and* public confidence.

Thank you for your consideration and service to the State of Maine.

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Ryan Roy

Co-Founder

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PHYSICS CONSULTANTS Inc
RADIATION PHYSICS SERVICES

05/02/25

RE: LD 1567

To Whom it May Concern:

It is my professional opinion that the "Radiation Treatment" labeling proposed in LD 1567 is not necessary, would not provide any benefit to consumers, and would cause undue burden on companies who use irradiation for product quality and safety. As a registrant of a radiation producing device, facilities are already subject to the requirements of Parts 10-144 CMR Ch. 220 Parts D, E, and H.

Irradiation of products intended for human consumption is common and presents no risk to the consumer. There is no possibility for radiation to remain in the product. The only effect of the irradiation process is to remediate unwanted substances in the product.

Please feel free to contact me with questions about this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ryan Zipper', with a stylized flourish at the end.

Ryan Zipper, MS
Radiological Physicist
Maine Qualified Expert