Hebert, Michelle

From: Tim Gibb <tim@dsfcanna.com>
Sent: Tuesday, May 6, 2025 12:59 PM
To: Tim Gibb
Subject: Dreamscape Farms; Testimony in Opposition of LD1567
Attachments: Dreamscape Farms; Testimony in Opposition to LD1567.pdf

Esteemed Members of the VLA Committee,

Please find my testimony in opposition to LD1567 below and attached as submitted through the Testimony Submission portal:

I write to you today in opposition of LD1567. I was not initially going to take a position on this bill, but after hearing testimony and seeing the amount of misinformation being put out into the public space on this issue, I feel compelled to take this position. There are myriad reasons for said opposition:

1. **Stigma & Misinformation:** The FDA has recognized, dating to the late '90s, that this technology is stigmatized by the labeling requirements that were developed for produce. When customers were educated on the safety and shelf-stabilizing benefits of non-gamma X-Ray irradiation, they were more likely to adopt products that were treated in this manner. A large amount of AU cannabis is treated as a means of shelf stability and would be stigmatized without any consumer education on the issue. Mycotoxins have been raised as an issue, but OCP's own data shows that exactly **0%** of all remediated flower has tested positive for Mycotoxins. Another talking point is about combusting and inhaling inactivated mold spores. However, anyone who cooks regularly over the stove or grill, is exposed to this given the amount of meat and produce that is treated with this technology.

2. **Outdoor & Greenhouse:** Under the current AU testing regime, all Greenhouse and Outdoor flower has to be run through X-Ray in order to pass with any level of confidence. This, by default, stigmatizes all Greenhouse and Outdoor cannabis farmers unfairly.

3. **Current AU Testing Regime is Flawed:** As the committee has heard from constituents, operators, the labs themselves, and numerous other stakeholders, the current testing regime in the AU market is deeply flawed. The reason this is pertinent to LD1567, is that the current testing regime fails to speciate in its testing requirements, meaning that operators who deploy beneficial bacteria in their cultivation regiment are susceptible to failing tests under current AU testing standards.

4. **Shelf Stability:** Numerous 3rd party retailers that we sell to have told me point blank that they prefer product that has been treated due to the shelf-stabilizing qualities of the technology. The Lab Director of one of the lab groups in Maine validated this quality by testing a batch of flower that had been treated every month from August 2023-July 2024 and all samples came back <100CFU/g of Total Yeast & Mold with ND for Mycotoxins and a near-zero terpene loss.

5. **Overregulation:** It is not lost on me that most of the proponents of this bill are operators or customers of the medical program who do not participate in the AU program and themselves are not subject to the AU testing requirements. We heard spirited testimony from medical constituents, operators, and the like on reasons to keep the medical market from suffering the same overregulation of AU with all of AU's flaws. Yet, here, there is advocacy for increased regulation, which is hypocritical of the positions taken relative to the medical program. AU is already the most regulated in the state, and one of the most highly regulated in the nation. The last thing AU

needs is additional regulation, particularly regulation based upon stigma and misinformation that will cost operators revenue and the state tax revenue accordingly.

Respectfully,

Tim Gibb, Dreamscape Farms

Dreamscape Farms

— SIMPLY GROWN - SIMPLY GOOD —

May 6, 2025

Rep. Boyer, Rep. Hickman, Rep. Supica, and Members of the VLA Committee,

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