

Hebert, Michelle

From: Ryan Roy <ryan@jarcannabis.com>
Sent: Tuesday, May 6, 2025 3:02 PM
Subject: Support of LD 1620

This message originates from outside the Maine Legislature.

Dear Chairpersons and Members of the Committee,

My name is Ryan Roy, Co-Founder of JAR Cannabis. I am writing to express my strong support for LD 1620, "An Act to Amend the Laws Regulating the Testing of Adult Use Cannabis and Adult Use Cannabis Products."

As an operator in Maine's adult-use cannabis market, I can speak directly to the burdensome costs and challenges associated with the current microbial testing system. Our company spent over \$32,000 on testing in the last month alone. While we fully support consumer safety and product quality, the current testing framework imposes an unsustainable financial burden, especially for businesses like ours that strive to grow organically and sustainably.

This bill takes important steps in the right direction:

- It proposes a reasonable total yeast and mold threshold of 100,000 CFU/g, aligned with international and national standards used in other markets. This threshold reflects a better understanding of microbial biology and cannabis plant characteristics.
- It limits additional microbial testing to only pathogens known to be harmful to human health, such as *E. coli*, *salmonella*, and coliforms. This change acknowledges that not all microbes are harmful, and many are in fact beneficial—particularly in organic cultivation.
- It also introduces the audit testing option for licensees with proven track records of clean product. This incentivizes consistency, reduces regulatory waste, and promotes efficiency.

One of the most important elements that still needs more attention in Maine's system is the lack of speciated microbial testing. Many cultivators, including our team, use OMRI-listed beneficial bacteria and fungi—like *Bacillus* and *Trichoderma*—to promote plant health and fight off pathogens naturally. Ironically, these good microbes often cause failed tests, even though they pose no risk to consumers and are part of accepted organic farming practices.

Without speciated testing, the system continues to penalize growers who do the right thing and invest in soil health, sustainability, and clean cultivation methods. Raising microbial thresholds and focusing only on harmful organisms—as this bill does—is a pragmatic step toward fixing that imbalance.

Conclusion

LD 1620 helps protect public health while also creating room for the cannabis industry in Maine to survive and thrive. It modernizes testing standards in a thoughtful, evidence-based way. We urge the

Committee to support this bill and consider further improvements such as requiring speciated microbial testing to better distinguish between harmful and beneficial organisms.

Thank you for your time and your work on behalf of Maine's cannabis community.

Respectfully submitted,

--

Ryan Roy

Co-Founder

JAR Cannabis Co.

(207) 576-1805

ryan@jarcannabis.com

www.jarcannabis.com