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Regarding Sec. 3. 22 MRSA §2423-A, sub-§2, ¶K-1 and the wholesale limitation that has been placed upon cannabis caregivers and cultivators.

My concern is that a 75% wholesale restriction imposes undue risk and burdens on small caregivers by blocking them from wholesaling options, when retail sales dip or are unpredictable. Such a restriction would prevent the caregiver from taking advantage of a wholesaling opportunity without incurring the risk that later retail volumes will be insufficient. I believe that such a restriction on small caregivers is unnecessary to the purposes of the currently proposed rules because of (i) the small quantities involved and (ii) the fact that the proposed track and trace requirement is sufficient protection against potential abuse.

Most caregivers in the cannabis industry are simply cultivators, and being a cultivator is a full-time job. Requiring caregivers to distribute directly in addition to bringing their produce to market (wholesaling) places undue strain on individual caregiver businesses. It is a heavy burden placed on a caregiver to mandate that unless he knows for a fact that he will have retail sales, that he cannot sell his wares. As in any type of farming, harvest yields and demands can fluctuate dramatically and thus the proportion of wholesale/retail needs flexibility.

Thank you for your consideration.