Submitted by: Deneen Morrotta Director of Cultivation Operations

Date: 5/5/25

Chairpersons and Members of the Committee,

My name is **Deneen Morrotta**, and I serve as the **Director of Cultivation Operations at an Adult Use Cannabis Cultivation Center**. I am writing to express my strong opposition to **LD 1567**, which would impose new labeling and equipment registration requirements for cannabis treated with irradiation or ozonation.

At our cultivation center, we pride ourselves on running an exceptionally clean and controlled cultivation environment. Despite our stringent cleanliness standards, microbial test failures still occur—through no fault or negligence of our practices. The cannabis industry in Maine is facing immense pressure due to **increasing regulatory demands**, **taxes**, **and production costs**. Many businesses are already closing their doors. In response, our company made a responsible investment in treatment technology to ensure we can **consistently pass microbial testing**, because a single failed test can be devastating—financially and reputationally.

Most of our strains pass Maine's rigorous testing standards, but **some of our customers' favorite strains occasionally require microbial treatment** to meet compliance—particularly for aerobic bacteria and yeast/mold panels. In nearly all cases, test failures are **directly linked to our use of organic cultivation practices**, including **OMRI-listed biological inputs** like *Bacillus* and *Trichoderma*. These beneficial microbes are intentionally introduced to the plant to **combat harmful pathogens naturally**.

The issue isn't that our product is unsafe—it's that current testing frameworks do not distinguish between harmful and beneficial microbes. What we need is testing reform: specifically, the ability to speciate microbes and differentiate "good" from "bad" bacteria, rather than penalize cultivators using sustainable, organic growing methods.

The proposed labeling requirement would create **an unfair stigma** for operators like us who are doing the right thing. No other state in the U.S. currently requires labeling for cannabis treated with irradiation or ozonation. The **equipment we use is safe, effective, and has no adverse impact** on product quality, consumer health, or operator safety. In fact, many professionals—**including those outside the cannabis industry**—believe all cannabis flower should be treated post-harvest to reduce microbial risk and improve shelf stability.

By mandating a label that calls out this treatment, the state risks **alarming consumers** unnecessarily and suggesting that treated products are somehow inferior. This undermines consumer trust in **safe**, **clean cannabis**, discourages innovation, and could ultimately **harm Maine's standing in the national market**—especially as interstate commerce becomes a reality.

Conclusion

This bill would place unnecessary burdens on responsible operators, increase consumer confusion, and penalize organic cultivation. I urge the Committee to vote **Ought Not to Pass** on LD 1567.

Thank you for your time and consideration.

Respectfully submitted,
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