Arleigh Kraus

Seed2health Learning Health Alliance

LD 104

Seed2Health Learning Health Alliance Testimony

LD 104 An Act to Protect the Health of Medical Cannabis Patients and Streamline the Mandatory Testing of Cannabis

My name is Arleigh Kraus. I am the owner of a small organic vegetable and poultry farm and Windhill Organics, a medical cannabis company in Warren, Maine. Many of you know me through my work with the VLA and on other civic and policy matters.

I am speaking today on behalf of my fellow volunteer members of Seed2Health Learning Health Alliance regarding LD 104.

Seed2Health is an open grassroots community of people who are re-imagining how to gather, learn from, and safely share knowledge through the lens of our common health experiences. As we help others and they, in turn, help us to understand what is working and what is not, we see a "pay-it-forward" approach taking shape for getting and staying healthy. We call this learning health.

Our collective perspectives are those of registered "patients" in Maine's Medical Cannabis Program, academics and researchers, experts in learning health sciences, clinicians and pharmacists, therapeutic formulators, as well as licensed cannabis caregivers in the medical program.

We are supported in our collaboration by Andrew Thacher and a company he co-founded in 2017, Seed2Health, LLC, which is located at Tech Place in Brunswick, Maine. Andrew serves as the manager of the alliance and the services and innovations we are shaping to reduce the cost and grow the value of learning health. Next year, we are launching Consensus 26 – a series of online forums to engage broader community awareness and participation in shaping learning health consensus guidances. These forums are organized within three learning health communities: Plant Health Balance, Member Health Balance and Learning Health Exchange. Key to the value and growth within these communities are the trusted and transparent product labels that connect them and the information they contain including "whole plant" testing results.

Pertinent topics we are exploring within the Plant Health Community are "Balanced Testing" and "Connected Labeling". Our focus is on risk-balanced testing, sampling, chain of custody, range-based reporting, untested products, audits, recalls, safe action limits, warnings, tiered pricing, inter-laboratory comparative testing, and open access to test results for tested retail products.

While these guidances are needed to enable learning health as determined by Seed2Health alliance members, we see them helping to reduce unnecessary tests and failures (a significant and wasteful cost to market registrants and ultimately consumers) while improving inter-laboratory testing consistency and overall program integrity.

It is with this understanding that we ask the committee to pursue learning before legislating with regard to LD 104 and any other bills regarding Maine's Medical Cannabis Program. The matters in these bills are complex and inter-connected. And the science informing them is dynamic and - frustratingly – too often unsettled.

Specifically, we encourage the committee to consider the two following suggestions: • Host a second testing education session for members of the VLA committee like the session held on February 13, 2023.

• Encourage and/or empanel a study group wherein program registrants and testing labs conduct a systematic review that brings together research and insight from subject matter experts on cannabis testing science. Along with Maine, every state desperately needs to know what such a study will reveal.

To refresh memories, we are attaching documents describing two examples of learning together in which members of the VLA committee, Seed2Health and others engaged:

• The first document presents the written comments (see online version here) we

presented at the VLA testing education session held in 2023. Recordings of all presentations made can be viewed at the following links: see Part 1 and Part2 • The second document (see online version here) presents excerpts and a link to the recording of the open forum on cannabis testing that Seed2Health hosted in 2021 among Chris Hudalla, Founder, Chief Scientific Officer of ProVerde Labs, members of the VLA committee, MMP registrants and our Seed2Health colleagues. As before, we stand ready to help however we can. Only together will we realize the innovative approaches needed to assure that all registrants – especially smaller and home-based caregivers who work closely with their patients – can thrive. When we succeed, we see much larger health and healthcare markets taking shape around all beneficial plants including cannabis. To get there, we must assure quality therapeutics informed by accurate testing, labeling and ongoing learning. Respectfully,

Arleigh Kraus