Brett, Manager at an Adult Use Cannabis Company in Maine

## LD1567 - opposed

My name is Brett. I manage an adult-use cannabis manufacturing facility here in Maine. I am writing to voice my strong opposition to LD 1567.

No other state in the country requires labeling for products treated with X-ray or ozone. Maine would be the first state to require it, and with no valid scientific reason. This labeling requirement will be detrimental to the perception of Maine's cannabis quality and safety.

Supporters say this is about transparency. But real transparency would be voluntary labeling for any product that wants to advertise "non-remediated" status. This bill just creates stigma and confusion around safe, regulated practices.

This legislation unfairly targets businesses in the adult-use market—businesses like ours that already follow some of the toughest testing, labeling, and product safety rules in the entire industry. Unlike the medical or unregulated markets, we operate under strict oversight and compliance.

I believe that investments made into x-ray decontamination equipment have been required because cultivators can't pass tests regularly; the technology is to ensure shelf stability. If a batch tests at 6,000 CFUs, it would pass the state-mandated 10,000 CFU threshold. However, the mold spores are alive and will continue to grow, making it likely that an off-the-shelf audit test would then fail, creating mistrust in the producer, the store, and Maine's Cannabis Program. X-ray and ozone will ensure that every product we sell meets Maine's low microbial thresholds and remains shelf stable. Requiring labels for these treatments would mislead customers and could damage their trust in the legal cannabis system.

There is no scientific or health-based evidence provided to justify such a label. Instead, the added burden risks pushing consumers away from safe, tested products and into unregulated markets where there are no standards.

Most supporters of this bill consist of medical operators who do not participate in the AU program. These proponents, including the bill sponsor, typically stand for deregulation of cannabis rules for both AU and medical cannabis programs - except on this particular issue. Their support of this labeling requirement, by extension, is support for mandatory testing. Something they are adamantly opposed to.

Additional regulations on the most regulated cannabis program in Maine are not fair.

With the legal market already under pressure from unregulated hemp-derived products and illicit sellers, now is not the time to introduce more unnecessary obstacles for licensed, responsible businesses.

I urge the committee to vote against LD 1567.

Thank you.