

Clayton Sulak
Richmond
LD 104

There are times when testing is appropriate and times when it is a undue burdden on small industry. We also must be aware that there are problems with testing laboratory methods and business methods.

When I opened my testing lab there was no product consistency and it was important to test the oral formulation for pediatrics to insure consistency and for the doctor to know what worked and what didn't. Listening today I hear a lot of concerns about mold and aspergillus and about the burden of testing. I also know that many of our growers have sent the same samples into the labs 3 times and gotten different results on mold and pesticides.

I propose that even though testing labs are ISO certified, none of the labs are willing to use the ASTM internationally standardized testing methods and therefore are still inconsistent because they insist on using their own methods.

These labs also do nothing to cut costs and promote expensive testing methods within their own companies.

There is reasonable testing and there is a undue burden. Mycotoxins from the actually toxic yeasts and molds than leave chemicals behind can be tested for and are specific, more accurate and cheaper than testing for a full microbial panel. By testing for those toxic chemical produced by the worse molds is a more accurate way then plating total bacterial counts. There are ways to have reasonable testing but an extensive expensive test on every small batch will not promote safety only big business. Our community has sent the same samples in triplicate the labs for contaminant testing and gotten a wide range of innacurate results for both microbial and pesticides.

When I worked for licensed labs in Maine and testified years ago promoting testing I was young and I was told to testify for testing and my bosses would secretly tell me to because of how much money it would make the Laboratory when it became mandatory.

Yes there are times when testing is needed. but a broad expensive test on every batch is not good for the Maine community only big business. Producers could undergo some surprise testing for contamination over the course of a year and need to have proof of ttesting when making new recipes. Testing for mycotoxins only not total microbes and that if the regulation of out industry is going to be decided by the testing labs that the testing labs should have to conform to ASTM methods because ISO 17025 is not enough to insure accuracy or that the correct testing for our industry is what is being promoted or completed in the lab. Again I saw many poor lab practices and lots of inconstancy and money driven business.

Additionally Metric track and trace has been shown to not stop diversion and I cannot understand while small maine business are being burdened while illegal operations are not prosecuted.