



ASSOCIATION OF CANNABINOID SPECIALISTS

SCIENCE. EDUCATION. REGULATION. COMPASSION.

May 5, 2025

To the Honorable Members of the Maine Legislature:

On behalf of the Association of Cannabinoid Specialists (ACS), I am writing to strongly urge the Legislature to require mandatory testing for mold, heavy metals, and pesticide contamination in all cannabis products within Maine's medical program. Our organization is led by physicians who care for patients with serious and chronic illnesses. These patients depend on cannabis as part of their treatment, and they deserve assurance that the products they use are free of contaminants that could worsen their health or threaten their lives.

Evidence from the medical literature underscores the risks of fungal contamination in cannabis. In one widely cited case, a leukemia patient undergoing bone marrow transplantation died from invasive pulmonary aspergillosis after smoking mold-contaminated cannabis (Hamadeh et al., Chest, 1988). Other reports describe similar outcomes in patients with diabetes (Chiu et al., CMAJ, 2015) and transplant recipients (Kagen et al., Transplantation, 1996). Fungal exposure through inhaled cannabis—especially from molds like *Aspergillus*—can be fatal for immunocompromised individuals.

The cut off limits for mold levels are fairly arbitrary but no number greater than zero is safe. It is also likely unrealistic to aim for zero. < 10,000 CFU seems to be a standard that appears safe and is born out on a national level.

Raising that cut-off will harm patients. The compromise idea of testing for specific mold if the mold level is greater than 10,000 CFU sounds reasonable but likely isn't. The issue is that specific tests, usually PCR based, and advocated for by PCR companies, cannot detect species that they are not made to detect. Hence, they will miss any species that are not included, including some species that we may not yet know about. Thus, allowing a CFU level between 10k and 100k if no pathogenic species were found by PCR is not reliable.

Yet mold is just one piece of the contamination risk. Cannabis plants readily absorb heavy metals such as lead, arsenic, and cadmium from soil and water, and non-regulated cultivation can result in dangerous pesticide residues that persist in oils, tinctures, and inhaled products. These contaminants are harmful even in small quantities and can accumulate in the body, further endangering already-vulnerable patients.

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At present, Maine does not require universal testing for mold, heavy metals, or pesticide contamination in its medical cannabis program—a gap that puts patients at avoidable risk. Many other states have implemented these safeguards to protect public health and align cannabis regulation with medical standards. We respectfully urge the Maine Legislature to do the same. Instituting required contaminant testing will strengthen the integrity of the program, protect patients from hidden dangers, and ensure that the medicine they rely on is as safe as it is effective.

Sincerely,



Jordan Tishler, MD

Studies on Mold-Contaminated Cannabis and Health Risks

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3. Remington TL, Fuller J, Chiu I. Chronic necrotizing pulmonary aspergillosis in a patient with diabetes and marijuana use. *CMAJ*. 2015 Nov 17;187(17):1305-1308. doi: 10.1503/cmaj.141412. Epub 2015 Jun 22. PMID: 26100839; PMCID: PMC4646751.
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