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Subject: Public Comment for 11/21/24 Meeting
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Hello Cannabis Advisory Committee,

I was unable to be present during the Q&A discussion for item #4 based on the fluidity of the meeting. As such, I have prepared the following public comment for your inclusion.

Hello, I'm Dave Vaillencourt, honored to be here as Chairman of the Board for the S3 Collective and Vice-Chair for ASTM International's Committee D37 on Cannabis. Thank you all for your hard work in navigating a challenging landscape with limited research to protect the consumers and patients in the great Republic of California.

By way of background, I hold a Master's of Science and a background in lab testing and data analytics, where I've been responsible for validating test methods and analyzing data critical to high-stakes cases, including the DOJ vs. BP Oil for the Deepwater Horizon incident and numerous superfund sites.

The S3 Collective is a 501(c)(3) that brings that same rigor to the cannabis industry. We are the only organization accepted into the FDA's Network of Experts program, where we provide specialized technical insight on cannabis and cannabinoids. Our volunteer membership of nearly 100 experts—including researchers, physicians, former regulators, and testing labs—mobilizes to develop evidence-based standards, which are submitted through ASTM International's 125-year old accredited standards development process where over 600 members spanning 30 countries, including prestigious institutions like NIST, USP, and Health Canada must come to consensus before a standard can be approved.

My comments today are focused on the proposed Laboratory Testing Regulations, with a focus on the pesticide testing. I urge the Committee to develop and leverage a risk-based testing strategy with both pre- and post-market surveillance. Instead of a fixed, prescriptive list, embrace a framework that evolves with science and technology to address emerging risks.

Finally, I'm here to support the analytical testing laboratories that have gone above and beyond to evaluate products for an expanded list of pesticides. These laboratories - including InfiniteCal and Anresco, along with members of the Vape Safer Coalition have invested significantly in toxicology research, analytics, and independent testing, setting aside competitive interests for the greater good.

I urge you to use the wide-swath of available data to drive transparent decision-making. Further,

leverage existing standards and corroborate the data independently. Most importantly, I want to encourage you to actively participate in the standards development process at ASTM International as members to ensure a future-proof regulatory framework that can meet the needs of today and tomorrow in order to protect patients and consumers.

Warm Regards,

David Vaillencourt

*Board Chair & Co-Founder of **S3 Collective** a 501(c)3 non-profit*

Vice-Chair, ASTM International Committee D37 on Cannabis