

February 20, 2026

Sen. Jeremy Moss
Chair, Senate Regulatory Affairs Committee
Michigan Senate
Lansing, MI 48933



Dear Senator Moss,

I am writing to express strong support for Michigan SB 704 and its call for the establishment of a State Reference Laboratory to monitor cannabis testing compliance.

Over the past several years, the Michigan Cannabis Regulatory Agency (CRA) has been required to address persistent concerns related to potency inflation and testing inconsistencies among certain private laboratories. These issues—particularly surrounding THC potency reporting—have created measurable distortions in the cannabis marketplace. When potency results vary widely between laboratories, or when inflated results enter the market, the consequences extend well beyond individual transactions. They undermine consumer trust, disadvantage compliant operators, and create uneven competitive pressures throughout the cultivation, processing, and retail supply chain.

Retail purchasing decisions are often driven by labeled potency. When inflated potency results become normalized, responsible licensees who adhere to accurate scientific standards are placed at a competitive disadvantage. This dynamic can unintentionally incentivize “lab shopping,” erode confidence in compliance systems, and strain regulatory enforcement resources. The CRA has taken important steps to address these challenges, but the absence of a centralized, state-run reference laboratory limits the state’s ability to establish uniform scientific baselines and independently verify testing methodologies.

SB 704 offers a constructive, science-based solution. A State Reference Laboratory would:

- 1. Establish Uniform Testing Standards and Method Validation**
By serving as a scientific benchmark for potency and contaminant testing, the reference lab would reduce variability among private laboratories and provide clear, validated methodologies.
- 2. Provide Independent Verification and Audit Capacity**
A state laboratory would allow regulators to conduct confirmatory testing, investigate discrepancies, and resolve disputes with greater transparency and technical authority.
- 3. Protect Market Integrity and Fair Competition**
Consistent and accurate potency reporting ensures that market competition is based on product quality and compliance—not inflated laboratory results.
- 4. Strengthen Consumer Confidence and Public Health Protections**
Reliable testing safeguards patients and adult-use consumers while reinforcing Michigan’s reputation as a responsible regulatory leader.

Michigan has a strong legacy in laboratory sciences and public health infrastructure. Establishing a State Reference Laboratory aligns with that legacy and directly addresses the longstanding testing challenges the CRA has worked diligently to manage.

For these reasons, I respectfully urge your support of SB 704. Creating a state reference laboratory is a practical and forward-looking policy step that will enhance regulatory consistency, protect consumers, and ensure a fair and credible cannabis marketplace.

Thank you for your consideration and leadership on this important issue. I would welcome the opportunity to discuss this further or provide additional information as needed.

Sincerely,

A handwritten signature in black ink that reads "Stephen Rapundalo". The signature is written in a cursive, flowing style.

Stephen Rapundalo, PhD
President and CEO