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Guidance for Creating Test and Retest Sample Packages

This guidance is provided by the Office of Cannabis Policy to ensure that licensees are selecting all required mandatory tests when submitting cannabis or cannabis products (collectively "cannabis items") for initial mandatory testing or retesting due to failed mandatory testing.

Creating Test Sample Packages for Initial Mandatory Testing

Steps:

1. Navigate to Active Packages Tab

Select "Packages" on the top navigational menu and then select the "Active" tab.

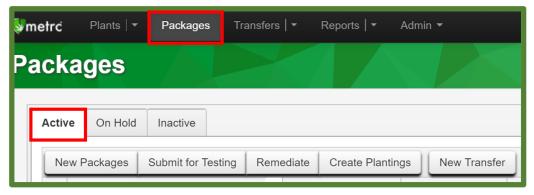


Figure 1: Navigation to Active Packages

2. Identify Package and Submit for Testing

Select the cannabis item package from which the test samples were collected. Then click "Submit for Testing".

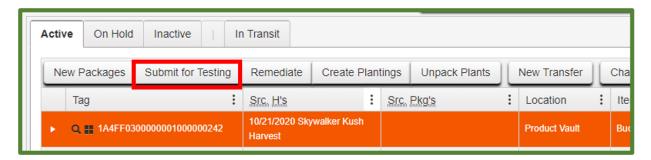


Figure 2: Identify Package and Submit for Testing

3. Sample Package Information

Complete the information requested in the "Submit for Testing" pop-up window.

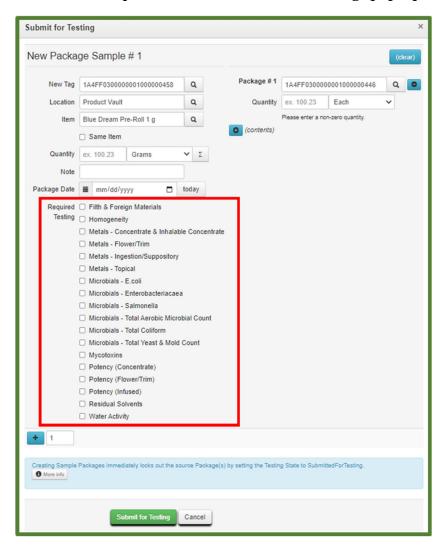


Figure 3: Sample Package Information

Please note: Prior to transferring cannabis or cannabis products to a cannabis store for sale to consumers, a cultivation facility or products manufacturing facility licensee must ensure that the cannabis or cannabis product, in its final form¹, has been subject to all mandatory tests, unless otherwise excepted by rule. A licensee may choose whether to conduct some tests, as indicated below, before the cannabis or cannabis product is in its final form. However, if a licensee chooses to conduct mandatory testing for some analytes before the cannabis concentrate or cannabis product is in its final form, all packages of cannabis combined to make that cannabis concentrate or cannabis product must have passed mandatory testing for any exempted analyte category.

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¹ "Final form" means a cannabis product that is in the form that will be sold to a cannabis consumer, except that the cannabis product need not be prepackaged into individual retail units to be considered in its "final form".

Please note: Seedlings, immature cannabis plants, and seeds are not subject to mandatory testing.

Please note: For licensees using third party vendors, be sure to check within METRC that the required tests are being selected.

3a. Mandatory Testing Requirements Generally

The Office of Cannabis Policy has implemented testing-related rules² which designate eight analyte types as listed below:

1. Filth and foreign material.

Listed in METRC as: "Filth & Foreign Materials".

2. Dangerous molds and mildew.

Listed in METRC as: "Microbials – Total Yeast & Mold Count".

3. Harmful microbes. This analyte type includes multiple microbial tests.

Listed in METRC as:

"Microbials - E. coli"

"Microbials - Enterobacteriaceae"

"Microbials - Salmonella"

"Microbials - Total Aerobic Microbial Count"

"Microbials - Total Coliform"

4. Water activity.

Listed in METRC as: "Water Activity"

5. THC potency, homogeneity, and cannabinoid profiles. This analyte type includes multiple tests. In METRC, the potency test is also categorized based on the matrix-type of the cannabis item tested.

Listed in METRC as:

"Homogeneity"

"Potency (Concentrate)"

"Potency (Flower/Trim)"

"Potency (Infused)"

6. **Other harmful chemicals (Metals)**. In METRC, the Metals test is categorized based on the product category type of the cannabis item tested.

Listed in METRC as:

"Metals - Concentrate & Inhalable Concentrate"

"Metals - Flower/Trim"

"Metals - Ingestion/Suppository"

"Metals - Topical"

7. Residual solvents, poisons, and toxins.

Listed in METRC as: "Residual Solvents"

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² <u>Adult Use Marijuana Program Rule, 18-691 C.M.R., ch.1</u> and <u>Rules for the Certification of Marijuana Testing Facilities, 18-691 C.M.R., ch. 5.</u>

8. Pesticides, fungicides, insecticides, and growth regulators. This analyte type is not *currently* required and is not listed in METRC (*see below for more information*).

Please note:

Currently, OCP requires mandatory testing for the following analyte types: Filth and foreign material; residual solvents, poisons, and toxins; dangerous molds and mildews; harmful microbes; THC potency, homogeneity, and cannabinoid profiles; metals; and water activity.

Beginning December 12, 2022, OCP will require mandatory testing for pesticides, fungicides, insecticides, and growth regulators.³ When pesticides testing becomes mandatory, licensees will have the option to test for pesticides either at flower/trim stage or in final form.

3b. Permissible Tests for Cannabis Items Prior to Final Form Stage

When a package of <u>cannabis concentrate</u> is intended for further manufacturing, the following analyte types are allowed for testing prior to final form:

- 1. Metals
- 2. Residual Solvents

Required	☐ Filth & Foreign Materials
Testing	☐ Homogeneity
	Metals - Concentrate & Inhalable Concentrate
	☐ Metals - Flower/Trim
	☐ Metals - Ingestion/Suppository
	☐ Metals - Topical
	☐ Microbials - E.coli
	☐ Microbials - Enterobacteriacaea
	☐ Microbials - Salmonella
	☐ Microbials - Total Aerobic Microbial Count
	☐ Microbials - Total Coliform
	☐ Microbials - Total Yeast & Mold Count
	☐ Mycotoxins
	☐ Potency (Concentrate)
	☐ Potency (Flower/Trim)
	☐ Potency (Infused)
	Residual Solvents
	☐ Water Activity

Figure 4: Required Analyte Types: Cannabis concentrate intended for further Manufacturing

³ See <u>Advance Notice on Mandatory Pesticide Testing</u>, September 8, 2022

3c. Mandatory Testing Requirements for Final Form Cannabis Items

As of September 8, 2022, if a final form package of cannabis, cannabis concentrate, or cannabis products is intended to be transferred to a cannabis store for sale to a consumer, the following analyte types are required for mandatory testing:

- 1. Filth and Foreign Material
- 2. Dangerous molds and mildew
- 3. Harmful microbes
- 4. Water activity
- 5. THC potency and cannabinoid profiles
- 6. Other harmful chemicals (Metals)
- 7. Residual Solvents, poisons, and toxins

Please note: Seedlings, immature cannabis plants, and seeds are not subject to mandatory testing.

Please note: *Beginning December 12, 2022*, OCP will require mandatory testing for pesticides, fungicides, insecticides, and growth regulators.⁴ When pesticides testing becomes mandatory, licensees will have the option to test for pesticides either at flower/trim stage or in final form.

The following figures show what tests are required by cannabis item category for a package to

be transferred to a cannabis store.

For Filth and Foreign Material:

Production Stage/Product	Filth & Foreign Material
Cannabis	
Buds/Flower	×
Kief (Flower)	×
Plants - Immature	
Plants - Vegetative	
Raw Pre-Rolls	×
Shake/Trim	×
Shake/Trim (by strain)	×
Cannabis Concentrate	
Concentrate (Each)	×
Concentrate (Weight)	×
Cannabis Product	
Capsule**	×
Drink	x
Edible (Liquid/Tincture)	×
Edible (Solid/semi-solid)**	×
Infused Pre-Roll	×
Suppository	×
Topical	×
Vape Products	×

Figure 5a: Required Analyte Type: Filth and Foreign Materials

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⁴ See <u>Advance Notice on Mandatory Pesticide Testing</u>, September 8, 2022

For Dangerous Molds and Mildews:

Production Stage/Product	Microbials - Total Yeast & Mold Count
Marijuana	
Buds/Flower	x
Kief (Flower)	x
Plants - Immature	
Plants - Vegetative	
Raw Pre-Rolls	x
Shake/Trim	x
Shake/Trim (by strain)	x
Marijuana Concentrate	
Concentrate (Each)	x
Concentrate (Weight)	x
Marijuana Product	
Capsule**	x
Drink	x
Edible (Liquid/Tincture)	x
Edible (Solid/semi-solid)**	x
Infused Pre-Roll	x
Suppository	x
Topical	x
Vape Products	x

Figure 5b: Required Analyte Type: Dangerous Molds and Mildew

For Harmful Microbes:

Production Stage/Product	Microbials - E.coli	Microbials - Enterobacteriaceae	Microbials - Salmonella	Microbials - Total Aerobic Microbial Count	Microbials - Total Coliform
Marijuana					
Buds/Flower	×	×	×	×	×
Kief (Flower)	×	×	×	×	×
Plants - Immature					
Plants - Vegetative					
Raw Pre-Rolls	×	×	×	×	x
Shake/Trim	x	×	×	×	x
Shake/Trim (by strain)	x	×	×	x	x
Marijuana Concentrate					
Concentrate (Each)	x	×	×	x	x
Concentrate (Weight)	x	×	×	x	x
Marijuana Product					
Capsule**	×	×	×	×	×
Drink	×	×	×	×	x
Edible (Liquid/Tincture)	×	×	×	×	×
Edible (Solid/semi-solid)**	×	×	×	×	×
Infused Pre-Roll	×	×	×	×	×
Suppository	×	×	×	×	x
Topical	×	×	×	×	x
Vape Products	x	×	x	×	×

Figure 5c: Required Analyte Type: Harmful Microbes

For Water Activity:

Production Stage/Product	Water Activity
Cannabis	
Buds/Flower	×
Kief (Flower)	×
Plants - Immature	
Plants - Vegetative	
Raw Pre-Rolls	x
Shake/Trim	×
Shake/Trim (by strain)	x
Cannabis Concentrate	
Concentrate (Each)	
Concentrate (Weight)	
Cannabis Product	
Capsule**	x
Drink	
Edible (Liquid/Tincture)	
Edible (Solid/semi-solid)**	×
Infused Pre-Roll	
Suppository	
Topical	
Vape Products	

Figure 5d: Required Analyte Type: Water Activity

^{**} Please contact the Office of Cannabis Policy on which specific products are required to be tested for Water Activity under this product type.

For THC Potency and Cannabinoid Profiles:

Production Stage/Product	Homogeneity	Potency (Concentrate)	Potency (Flower/Trim)	Potency (Infused)
Marijuana				
Buds/Flower			×	
Kief (Flower)			×	
Plants - Immature				
Plants - Vegetative				
Raw Pre-Rolls			×	
Shake/Trim			×	
Shake/Trim (by strain)			×	
Marijuana Concentrate				
Concentrate (Each)	×	x		
Concentrate (Weight)	×	×		
Marijuana Product				
Capsule**	×			x
Drink	x			x
Edible (Liquid/Tincture)	×			x
Edible (Solid/semi-solid)**	×			x
Infused Pre-Roll	×			x
Suppository	×			x
Topical	×			×
Vape Products	x	x		

Figure 5e: Required Analyte Types: THC Potency and Cannabinoid Profiles

For Metals:

Please Note: While this analyte may be tested in the concentrate stage prior to final form, the Licensee that transfers the cannabis or cannabis product to a cannabis store for sale must ensure that every required test is conducted for <u>every associated package that creates</u> the concentrate or cannabis product in its final form.

Production Stage/Product	Metals - Concentrate & Inhalable Concentrate	Metals - Flower/Trim	Metals - Ingestion/Suppository	Metals - Topical
Marijuana				
Buds/Flower		×		
Kief (Flower)		×		
Plants - Immature				
Plants - Vegetative				
Raw Pre-Rolls		×		
Shake/Trim		×		
Shake/Trim (by strain)		×		
Marijuana Concentrate				
Concentrate (Each)	x			
Concentrate (Weight)	x			
Marijuana Product				
Capsule**			×	
Drink			×	
Edible (Liquid/Tincture)			×	
Edible (Solid/semi-solid)**			x	
Infused Pre-Roll	x			
Suppository			x	
Topical				×
Vape Products	x			

Figure 5f: Required Analyte Type: Metals

For Residual Solvents:

Please Note: While this analyte may be tested in the concentrate stage prior to final form, the Licensee that transfers the cannabis or cannabis product to a cannabis store for sale must ensure that every required test is conducted for <u>every associated package that creates</u> the cannabis concentrate or cannabis product in its final form.

*** Testing for residual solvents is not required for cannabis flower, trim, kief, hashish, or cannabis products that have not been manufactured using chemical solvents. Testing for residual ethanol is not required for orally consumed tinctures that contain alcohol.

Production Stage/Product	Residual Solvents***
Marijuana	
Buds/Flower	
Kief (Flower)	
Plants - Immature	
Plants - Vegetative	
Raw Pre-Rolls	
Shake/Trim	
Shake/Trim (by strain)	
Wet Flower	
Wet Trim	
Marijuana Concentrate	
Concentrate (Each)	x
Concentrate (Weight)	x
Marijuana Product	
Capsule**	
Drink	
Edible (Liquid/Tincture)	
Edible (Solid/semi-solid)**	
Infused Pre-Roll	
Suppository	
Topical	
Vape Products	

Figure 5g: Required Analyte Type: Residual Solvent

4. Create Test Sample Packages

Once all required information has been entered and verified, click the "Submit for Testing" button.

Submit for Testing Cancel

Figure 6: Submit samples for testing.

<u>Creating Test Sample Packages for Retesting Following Failed</u> <u>Mandatory Testing</u>

A licensee that is submitting samples for retesting following a failed mandatory test should do so in accordance with this guidance and the Adult Use Cannabis Program Rule. As applicable, a licensee that chooses to remediate a failed batch must submit two samples for retesting in accordance with this section **if the remediated batch does not change form** (e.g. a failed batch of flower is remediated and submitted as flower for retesting).

If the remediated batch <u>does</u> change form, the licensee shall submit samples for testing in accordance with the guidance above for the submission of samples for initial mandatory testing.

Steps:

1. Navigate to Active Packages Tab

Select "Packages" on the top navigational menu and then select the "Active" tab.

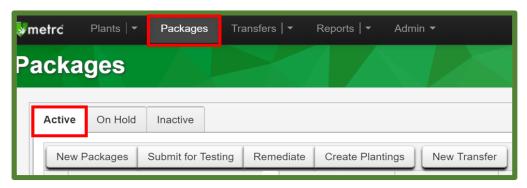


Figure 7: Navigation to Active Packages

Identify Package and Submit for Testing

Select the test failed cannabis item package from which the test samples were collected. Then click "Submit for Testing".

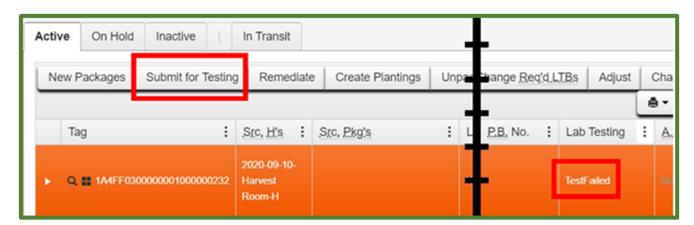


Figure 8: Sample Package Information

2. Sample Package Information

Complete the information requested in the "Submit for Testing" pop-up window.

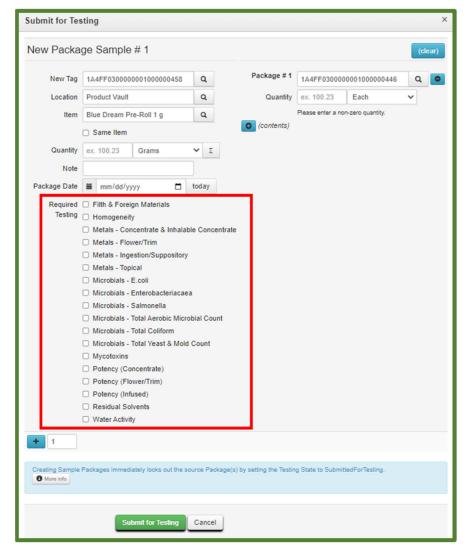


Figure 9: Identify Package and Submit for Testing

Please note: Licensees are required to select all "Required Testing" boxes according to initial failed analyte type(s) of the cannabis item sampled. Testing facilities have been directed to confirm appropriate analyte types have been selected prior to accepting a testing sample package. A cannabis testing facility may reject the sample if the licensee fails to select all required tests for retesting and a licensee may not transfer a batch to another licensee until all required retests have been passed. Please see Part 3b below for a list of analytes required upon retesting based upon the initial test failed.

Please note: For licensees using third party vendors, be sure to check within METRC that the required tests are being selected.

3a. Retest Requirements Generally

A licensee may submit for retesting a batch of cannabis items that failed initial mandatory testing in accordance with OCP rules and guidance. In some circumstances, based upon the analyte-type that had a failed result, a licensee may remediate the failed batch before submitting the cannabis item for retesting.

Please note: When OCP requires mandatory testing for pesticides, fungicides, insecticides, and growth regulators at the end of 2022,⁵ licensees will not be permitted to remediate cannabis items failing mandatory testing for pesticides, fungicides, insecticides, and growth regulators, but licensees may submit those items for retesting if they believe the failed result was in error.

3b. Retest Requirements for Cannabis Items Based Upon Failed Test Type(s)

When the package is failed for **Filth and Foreign Material**, retest required:

1. Filth and Foreign Material

Required Testing	Pitth & Foreign Materials Homogeneity Metals - Concentrate & Inhalable Concentrate Metals - Flower/Trim Metals - Ingestion/Suppository Metals - Topical Microbials - E.coli Microbials - Enterobacteriacaea Microbials - Salmonella Microbials - Total Aerobic Microbial Count Microbials - Total Yeast & Mold Count Mycotoxins Potency (Concentrate) Potency (Infused)
	□ Potency (Infused)□ Residual Solvents□ Water Activity

Figure 10: Retest Required for Filth and Foreign Material

⁵ See <u>Advance Notice on Mandatory Pesticide Testing</u>, September 8, 2022

When the package is failed for **Metals**, retest required for **cannabis concentrate**, **infused pre-rolls**, **and vape products**:

1. Metals – Concentrate & Inhalable Concentrate Shown in METRC:

Required	☐ Filth & Foreign Materials
Testing	☐ Homogeneity
	☑ Metals - Concentrate & Inhalable Concentrate
	☐ Metals - Flower/Trim
	☐ Metals - Ingestion/Suppository
	☐ Metals - Topical
	☐ Microbials - E.coli
	☐ Microbials - Enterobacteriacaea
	☐ Microbials - Salmonella
	☐ Microbials - Total Aerobic Microbial Count
	☐ Microbials - Total Coliform
	☐ Microbials - Total Yeast & Mold Count
	☐ Mycotoxins
	☐ Potency (Concentrate)
	☐ Potency (Flower/Trim)
	☐ Potency (Infused)
	☐ Residual Solvents
	☐ Water Activity

Figure 11: Retest Required for Retest Metals in Concentrate, Infused Pre-Rolls, and Vape Products

When the package is failed for Metals, retest required for cannabis flower, trim, or kief:

1. Metals - Flower/Trim

Required	☐ Filth & Foreign Materials
Testing	☐ Homogeneity
	☐ Metals - Concentrate & Inhalable Concentrate
	☑ Metals - Flower/Trim
	☐ Metals - Ingestion/Suppository
	☐ Metals - Topical
	☐ Microbials - E.coli
	☐ Microbials - Enterobacteriacaea
	☐ Microbials - Salmonella
	☐ Microbials - Total Aerobic Microbial Count
	☐ Microbials - Total Coliform
	☐ Microbials - Total Yeast & Mold Count
	☐ Mycotoxins
	☐ Potency (Concentrate)
	☐ Potency (Flower/Trim)
	☐ Potency (Infused)
	☐ Residual Solvents
	☐ Water Activity
_	

Figure 12: Retest Required for Retest Metals in Flower, Trim, or Kief

When the package is failed for **Metals**, retest required for **cannabis capsules**, **drinks**, **edibles** (liquid/tincture), **edibles** (solid), and suppositories:

1. Metals – Ingestion/Suppository

Shown in METRC:

☐ Filth & Foreign Materials
☐ Homogeneity
☐ Metals - Concentrate & Inhalable Concentrate
☐ Metals - Flower/Trim
Metals - Ingestion/Suppository
☐ Metals - Topical
☐ Microbials - E.coli
☐ Microbials - Enterobacteriacaea
☐ Microbials - Salmonella
☐ Microbials - Total Aerobic Microbial Count
☐ Microbials - Total Coliform
☐ Microbials - Total Yeast & Mold Count
☐ Mycotoxins
☐ Potency (Concentrate)
☐ Potency (Flower/Trim)
☐ Potency (Infused)
☐ Residual Solvents
☐ Water Activity

Figure 13: Retest Required for Retest Metals in Capsules, Drinks, Edibles (Liquid/Tincture), Edibles (Solid), and Suppositories

When the package is failed for **Metals**, retest required for **topicals:**

1. Metals - Topical

Shown in METRC:

Figure 14: Retest Required for Retest Metals in Topicals

When the package is failed for **Harmful Microbes**, retests required:

- 1. Microbials E. coli
- 2. Microbials Enterobacteriaceae
- 3. Microbials Salmonella
- 4. Microbials Total Aerobic Microbial Count
- 5. Microbials Total Coliform

Shown in METRC:

	☐ Filth & Foreign Materials
Testing	☐ Homogeneity
	☐ Metals - Concentrate & Inhalable Concentrate
	☐ Metals - Flower/Trim
	☐ Metals - Ingestion/Suppository
	☐ Metals - Topical
	Microbials - E.coli
	Microbials - Enterobacteriacaea
	Microbials - Salmonella
	Microbials - Total Aerobic Microbial Count
	Microbials - Total Coliform
	☐ Microbials - Total Yeast & Mold Count
	☐ Mycotoxins
	☐ Potency (Concentrate)
	☐ Potency (Flower/Trim)
	☐ Potency (Infused)
	☐ Residual Solvents
	☐ Water Activity

Figure 15: Retest Required for Harmful Microbes

When the package is failed for **Dangerous Molds and Mildew**, retests required:

- 1. Microbials Total Yeast & Mold Count
- 2. Mycotoxins

i	
	th & Foreign Materials
Testing Ho	omogeneity
□ Me	etals - Concentrate & Inhalable Concentrate
□ Me	etals - Flower/Trim
□ Me	etals - Ingestion/Suppository
☐ Me	etals - Topical
□ Mi	crobials - E.coli
□ Mi	crobials - Enterobacteriacaea
☐ Mi	crobials - Salmonella
□ Mi	crobials - Total Aerobic Microbial Count
□ Mi	crobials - Total Coliform
☑ Mi	crobials - Total Yeast & Mold Count
✓ My	ycotoxins
□ Po	tency (Concentrate)
□ Po	tency (Flower/Trim)
□ Po	tency (Infused)
□ Re	esidual Solvents
□ Wa	ater Activity

Figure 16: Retest Required for Dangerous Molds and Mildew

When the package is failed for **THC potency or Homogeneity**, retest required for **cannabis concentrate and vape products:**

- 1. Potency (Concentrate)
- 2. Homogeneity

Shown in METRC:

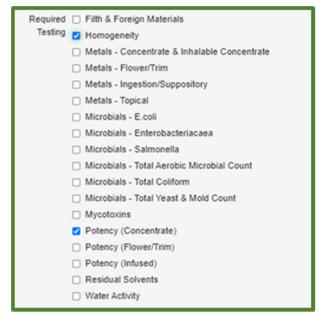


Figure 17: Retest Required for Cannabis Concentrate and Vape Product Potency

When the package is failed for **THC potency or Homogeneity**, retest required for **cannabis infused product:**

- 1. Potency (Infused)
- 2. Homogeneity

Shown in METRC:



Figure 18: Retest Required for Cannabis Infused Product Potency

When the package is failed for **Water Activity**, retests required:

1. Water Activity

Shown in METRC:

Required	☐ Filth & Foreign Materials
Testing	☐ Homogeneity
	☐ Metals - Concentrate & Inhalable Concentrate
	☐ Metals - Flower/Trim
	☐ Metals - Ingestion/Suppository
	☐ Metals - Topical
	☐ Microbials - E.coli
	☐ Microbials - Enterobacteriacaea
	☐ Microbials - Salmonella
	☐ Microbials - Total Aerobic Microbial Count
	☐ Microbials - Total Coliform
	☐ Microbials - Total Yeast & Mold Count
	☐ Mycotoxins
	☐ Potency (Concentrate)
	☐ Potency (Flower/Trim)
	☐ Potency (Infused)
	☐ Residual Solvents
	☑ Water Activity

Figure 19: Retest Required for Water Activity

When the package is failed for **Residual Solvents**, retests required:

1. Residual Solvents

	☐ Filth & Foreign Materials
Testing	☐ Homogeneity
	☐ Metals - Flower/Trim
	☐ Metals - Ingestion/Suppository
	☐ Metals - Topical
	☐ Microbials - E.coli
	☐ Microbials - Total Aerobic Microbial Count
	☐ Microbials - Total Yeast & Mold Count
	☐ Mycotoxins
	☐ Potency (Concentrate)
	☐ Potency (Flower/Trim)
	☐ Potency (Infused)
	Residual Solvents
	☐ Water Activity

Figure 20: Retest Required for Residual Solvents

4. Create Test Sample Packages

Once all required information has been entered and verified, click the "Submit for Testing".



Figure 21: Submit samples for testing.