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ADMINISTRATIVE & FINANCIAL SERVICES

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## **Guidance for Creating Test and Retest Sample Packages**

This guidance is provided by the Office of Marijuana Policy to ensure that licensees are selecting all required mandatory tests when submitting marijuana or marijuana products (collectively "marijuana 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.

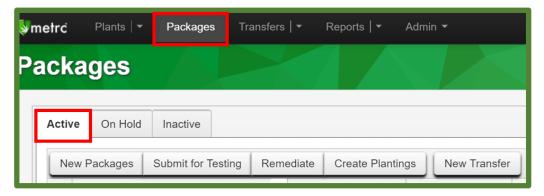


Figure 1: Navigation to Active Packages

## 2. Identify Package and Submit for Testing

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

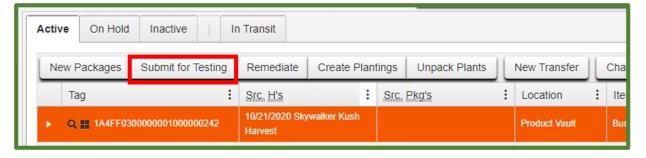


Figure 2: Identify Package and Submit for Testing

#### 3. Sample Package Information

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

**Please note:** Licensees are required to select all "Required Testing" boxes according to the matrix type of the marijuana item sampled and whether the item is subject to transfer for further manufacturing before retail sale. Licensees must select all required analyte types and the testing facility has been directed to confirm appropriate analyte types have been selected prior to accepting a testing sample package.

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

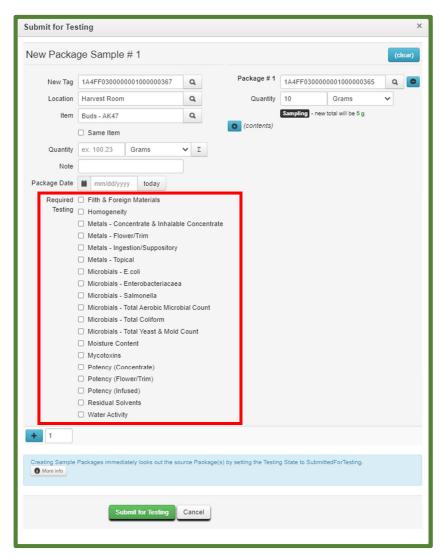


Figure 3: Sample Package Information

## 3a. Mandatory Testing Requirements Generally

The Office of Marijuana Policy has implemented testing-related rules<sup>1</sup> 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 and moisture content. This analyte type includes two different tests. Listed in METRC as:

"Moisture Content" and "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 marijuana 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 marijuana item tested.

Listed in METRC as:

"Metals - Concentrate & Inhalable Concentrate"

"Metals - Flower/Trim"

"Metals - Ingestion/Suppository"

"Metals - Topical"

7. Residual solvents, poisons, and toxins. In METRC, the Metals test is categorized based on the product category type of the marijuana item tested.

Listed in METRC as:

"Residual Solvents"

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

8. Pesticides, fungicides, insecticides, and growth regulators. This analyte type is not currently required and is not listed in METRC.

#### **Please note:**

As of October 1, 2021, OMP requires mandatory testing for the following analyte types: Filth and foreign material; dangerous molds and mildews; harmful microbes; THC potency, homogeneity, and cannabinoid profiles; metals; residual solvents, and water activity and moisture content. OMP will require mandatory testing for pesticides, fungicides, insecticides, and growth regulators before the end of 2021.<sup>2</sup>

# **3b.** Mandatory Testing Requirements for Marijuana Items Based Upon Production Stage

When a <u>Wet Flower or Wet Trim Marijuana</u> package is intended to be transferred by a cultivation facility **to a manufacturing facility** for further manufacturing, the following analyte types are currently required for mandatory testing:

1. Metals

#### 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
	☐ Moisture Content
	☐ Mycotoxins
	☐ Potency (Concentrate)
	☐ Potency (Flower/Trim)
	☐ Potency (Infused)
	Residual Solvents
	☐ Water Activity

**Figure 4a: Required Analyte Types:**Wet Flower or Wet Trim intended to be transferred to Manufacturing Facility

<sup>&</sup>lt;sup>2</sup> See "Required Analyte Types for Mandatory Testing" OMP Guidance Document dated July 29, 2021 available at: <a href="https://www.maine.gov/dafs/omp/resources/guidance-documents">https://www.maine.gov/dafs/omp/resources/guidance-documents</a> "Marijuana Testing Facility Guidance Documents" (accessed September 13, 2021).

When the <u>Marijuana</u> package (including marijuana trim, finished plant material, pre-rolled marijuana cigarettes, kief)—except for <u>Wet Flower or Wet Trim</u>—is intended to be transferred by a cultivation facility **to a manufacturing facility** for further manufacturing, the following analyte types are currently required for mandatory testing:

- 1. Water Activity and Moisture Content
- 2. Metals

#### 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
	✓ Moisture Content
	☐ Mycotoxins
	☐ Potency (Concentrate)
	☐ Potency (Flower/Trim)
	☐ Potency (Infused)
	☐ Residual Solvents
	✓ Water Activity

**Figure 4b: Required Analyte Types:**Marijuana intended to be transferred to Manufacturing
Facility

When a package of <u>marijuana concentrate</u> is intended to be transferred by a manufacturing facility **to another manufacturing facility** for further manufacturing, the following analyte types are currently required for mandatory testing:

- 1. Metals
- 2. Residual Solvents

#### Shown in METRC:

Required	Filth & Foreign Materials
Testing	
resung	☐ 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
	☐ Moisture Content
	☐ Mycotoxins
	☐ Potency (Concentrate)
	☐ Potency (Flower/Trim)
	☐ Potency (Infused)
	✓ Residual Solvents
	☐ Water Activity

**Figure 4c: Required Analyte Types:**Marijuana concentrate transferred from manufacturing facility to manufacturing facility

As of October 1, 2021, when a package of marijuana, marijuana concentrate or marijuana product is intended to be transferred **to a marijuana store**, 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 and moisture content
- 5. THC potency and cannabinoid profiles
- 6. Other harmful chemicals (Metals)
- 7. Residual Solvents

The following figures show what analyte tests are required by marijuana stage and product category for a package to be transferred to a marijuana store.

### For Filth and Foreign Material:

Production Stage/Product	Filth & Foreign Material
Marijuana	
Buds/Flower	x
Kief (Flower)	x
Plants - Immature	
Plants - Vegetative	
Raw Pre-Rolls	x
Shake/Trim	x
Shake/Trim (by strain)	x
Wet Flower	
Wet Trim	
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 5a: Required Analyte Type:** Filth and Foreign Materials

# For Dangerous Molds and Mildews:

	Microbials -
Production Stage/Product	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
Wet Flower	
Wet Trim	
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 Mildews

#### For Harmful Microbes:

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

Figure 5c: Required Analyte Type: Harmful Microbes

# For Water Activity and Moisture Content:

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

Figure 5d: Required Analyte Type: Water Activity and Moisture Content

<sup>\*\*</sup> Please contact the Office of Marijuana 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			x	
Kief (Flower)			x	
Plants - Immature				
Plants - Vegetative				
Raw Pre-Rolls			x	
Shake/Trim			x	
Shake/Trim (by strain)			x	
Wet Flower				
Wet Trim				
Marijuana Concentrate				
Concentrate (Each)	x	x		
Concentrate (Weight)	x	x		
Marijuana Product				
Capsule**	x			х
Drink	x			х
Edible (Liquid/Tincture)	x			х
Edible (Solid/semi-solid)**	x			х
Infused Pre-Roll	х			х
Suppository	x			х
Topical	x			х
Vape Products	X	x		

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

#### For Metals:

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

Figure 5f: Required Analyte Type: Metals

#### For Residual Solvents:



Figure 5g: Required Analyte Type: Residual Solvents

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

#### 4. Create Test Sample Packages

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



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 Marijuana 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 <u>does not</u> 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.

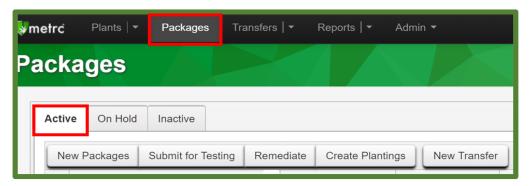


Figure 7: Navigation to Active Packages

# 2. Identify Package and Submit for Testing

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

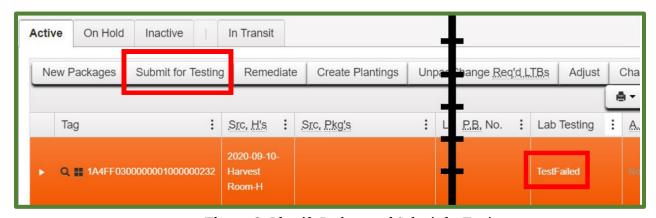


Figure 8: Identify Package and Submit for Testing

#### 3. Sample Package Information

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

**Please note:** Licensees are required to select all "Required Testing" boxes according to initial failed analyte type(s) of the marijuana item sampled. Testing facilities have been directed to confirm appropriate analyte types have been selected prior to accepting a testing sample package. A marijuana 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.

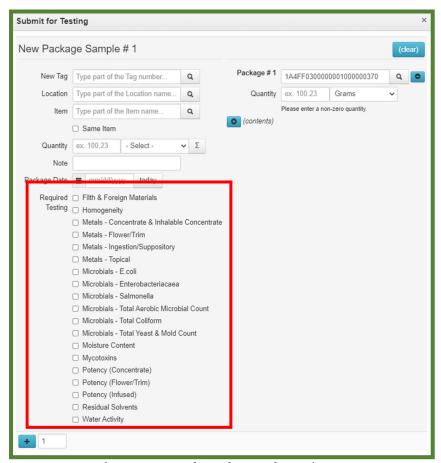


Figure 9: Sample Package Information

**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 and batch of marijuana items that failed initial mandatory testing in accordance with OMP 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 marijuana item for retesting.

**Please note:** When OMP requires mandatory testing for pesticides and metals in 2021,<sup>3</sup> licensees will not be permitted to remediate marijuana items failing mandatory testing based on those analytes, but licensees may submit those items for retesting if they believe the failed result was in error.

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

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

1. Filth and Foreign Material

Shown in METRC:



Figure 10: Retest Required for Filth and Foreign Material

<sup>&</sup>lt;sup>3</sup>See "Required Analyte Types for Mandatory Testing" OMP Guidance Document dated July 29, 2021 available at: <a href="https://www.maine.gov/dafs/omp/resources/guidance-documents">https://www.maine.gov/dafs/omp/resources/guidance-documents</a> "Marijuana Testing Facility Guidance Documents" (accessed September 13, 2021).

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

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



**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 marijuana flower, trim, or kief:

1. Metals - Flower/Trim

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
	☐ Moisture Content
	☐ Mycotoxins
	☐ Potency (Concentrate)
	☐ Potency (Flower/Trim)
	☐ Potency (Infused)
	☐ Residual Solvents
	☐ Water Activity
ļ—	

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

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

1. Metals – Ingestion/Suppository

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
	☐ Moisture Content
	☐ 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:

Required	☐ Filth & Foreign Materials
Testing	☐ Homogeneity
	☐ Metals - Flower/Trim
	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 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:

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
	☐ Moisture Content
	☐ 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

Shown in METRC:

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

Figure 16: Retest Required for Dangerous Molds and Mildew

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

- 1. Potency (Concentrate)
- 2. Homogeneity

#### Shown in METRC:

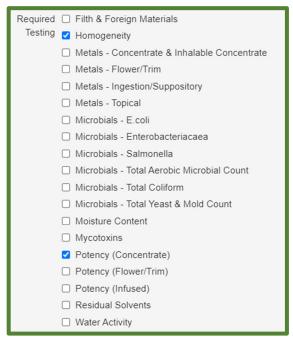


Figure 17: Retest Required for Marijuana Concentrate and Vape Product Potency

When the package is failed for **THC potency**, retest required for **marijuana flower**, **trim**, **or kief:** 

1. Potency (Flower/Trim)

#### 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
	☐ Moisture Content
	☐ Mycotoxins
	☐ Potency (Concentrate)
	✓ Potency (Flower/Trim)
	☐ Potency (Infused)
	☐ Residual Solvents
	☐ Water Activity

Figure 18: Retest Required for Marijuana Flower, Trim, or Kief Potency

# When the package is failed for **THC potency and Homogeneity**, retest required for **marijuana infused product:**

- 1. Potency (Infused)
- 2. Homogeneity

#### Shown in METRC:

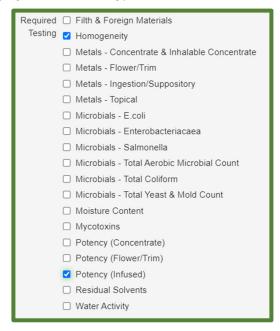


Figure 19: Retest Required for Marijuana Infused Product

# When the package is failed for **Water Activity and Moisture Content**, retests required:

- 1. Moisture Content
- 2. Water Activity

#### 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
	✓ Moisture Content
	☐ Mycotoxins
	☐ Potency (Concentrate)
	☐ Potency (Flower/Trim)
	☐ Potency (Infused)
	☐ Residual Solvents
	✓ Water Activity

Figure 20: Retest Required for Water Activity and Moisture

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

#### 1. Residual Solvents

#### Shown in METRC:

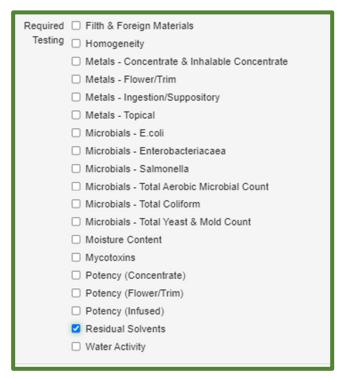


Figure 21: Retest Required for Water Activity and Moisture Content

#### 4. Create Test Sample Packages

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



Figure 22: Submit samples for testing.