



ADVISORY BULLETIN

July 5, 2022

CRA Guidance for Tinctures

Tinctures are not defined in either the Medical Marijuana Facilities Licensing Act (MMFLA) or the Michigan Regulation and Taxation of Marijuana Act (MRTMA). When a term is not specifically defined in statute, the Cannabis Regulatory Agency (CRA) uses the plain meaning of the term as defined in the dictionary. As a result, CRA policy has been that a product labeled as being a tincture must contain alcohol.

The CRA recently reviewed products produced and sold by several licensees that are labeled and sold as tinctures. The products appeared to be non-compliant because they were labeled as a tincture but contained no alcohol and exceeded the allowable THC limit of 100 mg per container in the adult-use market (per the THC limits contained in this [bulletin](#)).

The CRA has been notifying licensees that the sale of these products is a violation. In response, many licensees have expressed concern about the lack of a clarifying statutory definition, common industry practice in other states, and residual solvent compliance testing for tinctures.

To address these concerns until a long-term solution can be implemented, the CRA will allow licensees to make the necessary changes to packaging, labeling, formulations, and recipes, and take no disciplinary action against licensees regarding product that is currently available for sale or transfer for 60 days from the date of this bulletin (August 30, 2022).

Questions can be sent to the Cannabis Regulatory Agency Operations Support Section via email at CRA-Compliance@michigan.gov. For more information about the Cannabis Regulatory Agency, please visit www.michigan.gov/CRA.