CANNABIS REGULATORY AGENCY

TECHNICAL BULLETIN

September 19, 2022
Supersedes April 13, 2022

Compliant Creation and Testing of Inhalable Compound Concentrate Products and Pre-Rolls

The purpose of this technical bulletin is to provide clarification to licensees regarding the compliant creation and subsequent testing of inhalable compound concentrate products and pre-rolls.

Definitions

"Harvest batch" means a designated quantity of harvested marihuana, all of which is identical in strain and has been grown and harvested together and exposed to substantially similar conditions throughout cultivation.

"Final form" means the form a marihuana product is in when it is available for sale by a marihuana sales location, not including consumer packaging. For marihuana products intended for inhalation, final form means the marihuana concentrate in an e-cigarette or a vaping device.

As used in this bulletin, "flower" means buds, shake, or trim.

Inhalable compound concentrate products are defined as any products created by combining one or more marijuana products with marijuana (i.e., marijuana flower, kief) into a final form which is intended for inhalation.

Each individual package of marijuana or marijuana product used to create an inhalable compound concentrate product is considered a "component".

Inhalable Compound Concentrate Products

The following are examples of commonly created inhalable compound concentrate products:

- Infused pre-roll – marijuana flower along with the inclusion of distillate and addition of concentrate or kief combined into a pre-roll joint.
- Moon rocks – marijuana flower infused or coated with marijuana concentrate and subsequently rolled in kief.
- Caviar – often the same as moon rocks but may not include the addition of kief.
- Tarantula – marijuana flower, a coating of distillate, addition of kief and/or hash,

and then rolled into a pre-roll joint.

Note: Infused pre-rolls are subject to different regulations and testing requirements than marijuana-infused products (e.g., edibles, non-edible topical products).

The CRA classifies inhalable compound concentrate products as concentrates for purposes of determining transaction limits and requirements for marijuana product transfers, transportation, and labeling.

Only producers and microbusinesses (not including class A microbusinesses) are permitted to create inhalable compound concentrate products.

Inhalable Compound Concentrate Products: Required Testing

R 420.206(14) states: When combining marihuana and marihuana product into another marihuana product, each form of marihuana and marihuana product being combined must have passing safety compliance test results in the statewide monitoring system prior to the creation of the new combined product.

This means each component of an inhalable compound concentrate product **must** have passing safety compliance test results in Metrc **prior** to creating the combined product. The combined product must then be tested in final form in compliance with R 420.304 and R 420.305.

Raw Pre-Rolls

Raw pre-rolls contain only marijuana flower and must be harvest batch specific.

Adding kief to raw pre-rolls is only permitted if the kief is from the same harvest batch as the flower being used in the pre-roll.

Retailers and provisioning centers are not permitted to add kief to raw pre-rolls.

Raw Pre-Rolls: Required Testing

Final form testing is not required for raw pre-rolls if the flower has passed full compliance testing prior to creating the pre-roll.

This technical bulletin does not constitute legal advice. Licensees are encouraged to seek legal counsel to ensure their operations comply with all applicable laws and administrative rules. More information on the CRA can be found at the agency's website

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All inquiries related to the compliant creation of these products should be directed to

CRA-Compliance@michigan.gov

All inquiries related to the testing of these products should be directed to

CRA-SCF@michigan.gov

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