

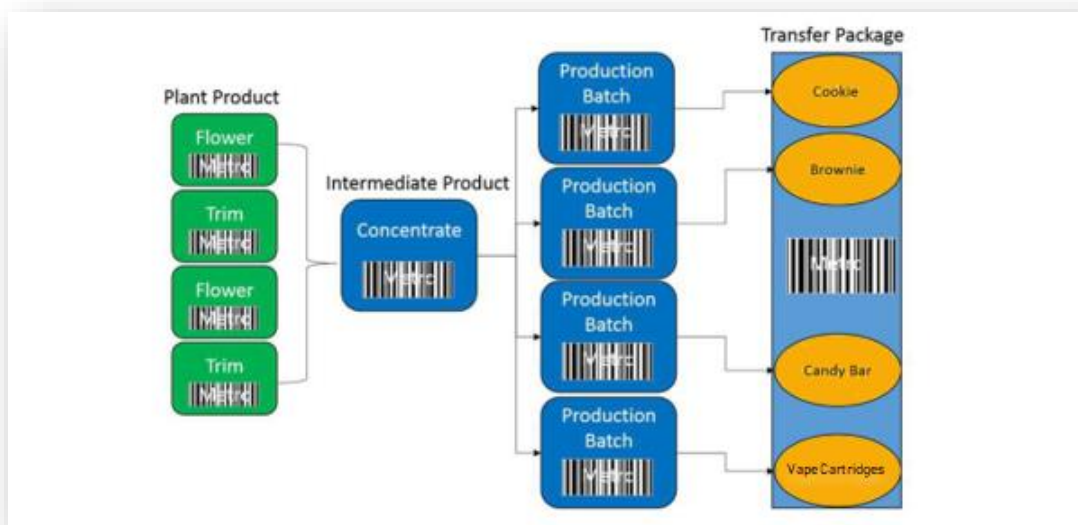


Testing Requirements for Production Products and Package RFID Tags

According to the MMFLA Administrative Rule 45(8), after a processor receives or purchases a package in the statewide monitoring system, and the processor proceeds to process the marijuana product in accordance with the scope of a processor license, the act, and these rules, the processor shall give the marijuana product a new package tag anytime the marijuana product changes form or is incorporated into something else. After a package is created by a processor of the marijuana product in its final state, the processor shall have the sample tested pursuant to R 333.247 and R 333.248. The processor shall not transfer or sell a final package until after test results indicate a passed test.

According to the Adult-Use Marijuana Establishments Emergency Rule 41(9), after a marijuana processor receives or purchases a package in the statewide monitoring system, and the marijuana processor proceeds to process the marijuana product in accordance with the scope of a marijuana processor license, the act, and these rules, the marijuana processor shall give the marijuana product a new package tag anytime the marijuana product changes form or is incorporated into something else.

Please see the below graphic and refer to the METRC user guide for additional detail:



Intermediate product (oil, distillate) testing is not required, product testing is only required for products in their final state.



The above diagram illustrates the flow of product from flower to finished product. From the diagram above, the final state would be the cookie, brownie or candy bar. **All products in cartridges must be tested as this is the final state that will go to the patient.**

Some facilities may find it beneficial to test the intermediate oil. If the product sold will be the oil, no additional tests are needed. If additional materials (terpenes, lipids, extracts or flavors) are added to the product, the product will require full compliance testing since the product was NOT in its final state when intermediate product testing was performed. R&D tests may also be performed but do not count as compliance tests. [See the METRC Bulletin for more information.](#)

Any time a new product is created (creating oil from trim, etc.), “production batch” should be selected. Once the final product has been created, tested, and is being broken down into smaller packages to transfer, items measured with a quantity of “each” should be individually labeled with the RFID package tag ID of the larger production batch, per the following rules:

- **MMFLA Administrative Rule 73: Before a marijuana product is sold or transferred to or by a provisioning center, the container, bag, or product holding the marijuana product must have a label and be sealed with all of the following information: The name of the licensee and the license number of the producer, including business or trade name, and tag or source number as assigned by the statewide monitoring system.**
- **Adult-Use Marijuana Establishments Emergency Rule 49: Before a marijuana product is sold or transferred to or by a marijuana retailer, the container, bag, or product holding the marijuana product must have a label and be sealed with all of the following information: The name of the licensee and the state license number of the producer, including business or trade name, and tag or source number as assigned by the statewide monitoring system.**

A copy of the item label should be affixed to the transfer package near the METRC package tag and to the transfer manifest. This is so the provisioning center or marijuana retailer receiving the product can match the individual items to the transfer manifest and their inventory.

The chart below lists the tests required by product type.

Compliance tests are only to be done on products in their final state.



	Flower (bud, shake/trim) from Harvest Batch	Marijuana Extract non-solvent & non-CO ₂ *	Marijuana Concentrate solvent based**	Marijuana Concentrate (Supercritical CO ₂) no additional solvent used***	Marijuana-Infused Product
Moisture Content	X				
Homogeneity					X
Potency Analysis	X	X	X	X	X
Foreign Matter Inspection	X	X			X
Microbial Screen	X	X			X Failed tests cannot be repeated
Water Activity	X				X
Heavy Metal Screen	X	X	X	X	X (If extract or concentrate not previously tested)
Residual Solvents			X		X (If extract or concentrate not previously tested)
Chemical Residue Analysis	X Failed tests cannot be repeated	X Failed tests cannot be repeated	X Failed tests cannot be repeated	X Failed tests cannot be repeated	X (If extract or concentrate not previously tested) Failed tests cannot be repeated

*Extraction using ice water, rosin press or dry ice.

**Solvents are used in the extraction process including Butane, Ethanol/Isopropyl alcohol, etc.

***Extraction process without winterization where a solvent is used. This abbreviated testing ONLY applies to products created without the use of a solvent. Products that are winterized MUST follow the solvent based testing requirements.