

**TECHNICAL BULLETIN** 

February 5, 2020

## Heavy Metals (Copper/Nickel)

The testing requirements set by the MRA for copper and nickel, located on page 24 of the Safety Compliance Facility (SCF) Sampling and Testing Technical Guidance for Medical and Adult-Use facilities, posted on October 30, 2019 will not be effective until July 1, 2020. All other testing standards – aside from copper and nickel – will remain the same.

If a testing sample is taken by an SCF on or before June 30<sup>th</sup>, 2020 the sample will not require a result for copper and nickel testing. If the sample is taken on or after July 1, 2020, the marijuana product will need to meet these additional testing requirements. Licensees should refer to the SCF Sampling and Testing Technical Guidance for medical facilities <u>here</u> and for adult-use <u>here</u>.

Heavy metal	Action Limit for all Inhaled Marijuana (Bud, Shake/Trim, Concentrates, Vape carts) (ppm)
Nickel	0.5
Copper (only required for vaping products)	3.0

This technical bulletin does not constitute legal advice and is subject to change. It is intended to provide a technical clarification only to the Department of Licensing and Regulatory Affairs' Administrative Rules. Licensees are encouraged to seek legal counsel to ensure their operations comply with the Medical Marihuana Facilities Licensing Act, the Michigan Regulation and Taxation of Marihuana Act and associated Administrative Rules.

A complete copy of the Administrative Rules can be found here.

A complete copy of the Adult-Use Marihuana Establishments Emergency Rules can be found <u>here</u>.

More information on the MRA can be found at the agency website: <u>www.michigan.gov/MRA</u>.