

Required Testing for Cultivators & Processors

The intent of this technical bulletin is to provide clarification on testing requirements for marijuana products throughout different phases in the cultivation and production process.

Testing Requirements for Cultivators

All harvested product (buds, shake/trim, kief) must be harvest batch, strain specific. Complete compliance testing is required prior to transfer. In Metrc, all required tests are included in the **raw plant material testing panel**.



Figure 1. Required harvest batch compliance panel testing

The only means for a cultivator to bypass harvest batch testing is through an agency-approved fresh frozen/extraction request. Please refer to this [bulletin](#) for more information related to the approval process. Compliance tests must be completed on products in their final form, i.e., exactly as they would be sold to a consumer. For more information on testing requirements and action limits please refer to this [bulletin](#).

Testing Requirements for Producers

This technical bulletin does not constitute legal advice and is subject to change. It is intended to provide a technical clarification only to the Marijuana Regulatory Agency's Administrative Rules. Licensees are encouraged to seek legal counsel to ensure their operations comply with the Administrative Rules.



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Once a product changes form through extraction at the Producer it will require full compliance testing as follows.

All products (distillate/oil) must have full compliance testing completed. In Metrc, all required tests are included in the **inhalable concentrate testing panel**. However, these products can be broken down into three categories:

- those being sold as ready-for-use concentrate, meant for dabbing or otherwise inhaling
- those concentrates that will be added to a vape cartridge in its final, ready for sale state
- those that are being sold as an intermediate concentrate product for the creation of infused products

1. When extracted product is being sold as a ready-for-use concentrate (shatter/batter/sauce/etc.), it must have full compliance testing completed. In Metrc, all required tests are included in the **inhalable concentrate testing panel**.

2. When extracted product is used to manufacture a vape cart, the concentrate must be first added to the vape cartridge/delivery device. Once that is complete, the product is required to have full compliance testing in final form. The licensee should select the Metrc **vape concentrate testing panel**.

3. When the extracted product is used in the manufacturing of an infused product, one of the following must occur:

- the oil must first be tested by selecting the **additional testing (Heavy Metals, Residual Solvents and Chemical Residue)** in Metrc
- the producer must test the infused product in final form by selecting the **infused product for infused edible and non-edible panels** in Metrc as appropriate and add **additional testing (Heavy Metals, Residual Solvents and Chemical Residue)**.

Additional tests are not R&D. If cannabis concentrate is being sold as an intermediate between processors, it is the responsibility of both parties to ensure that all required testing has been completed.

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Figure 2. Required compliance panel testing post extraction

Trade Samples

“Trade sample” means a sample of marijuana products provided to licensees by a cultivator or producer for the purpose of determining whether to purchase the marijuana product.

All trade samples provided to another licensee are required to have full compliance testing and be recorded in the statewide monitoring system.

Internal Product Samples

R420.509(1)(2)(3) – A cultivator, producer, marijuana sales location, or marijuana microbusiness may provide internal product samples directly to its employees for the purpose of ensuring product quality and making determinations about whether to sell the marijuana product. Internal product samples may not be transferred or sold to another licensee or consumer. Any internal product sample provided under this rule must be recorded in the statewide monitoring system. These samples are not required to be tested prior to dissemination to employees.

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Product Development Inventory

Product development may only be conducted by a cultivator or producer. Plants or concentrates may be designated for product development and must be tracked in the statewide monitoring system.

A licensee shall have product development inventory tested pursuant to R 420.304 and R 420.305 before transfer to its employees. The licensee shall not transfer or sell product development inventory to a marijuana sales location until after test results in the statewide monitoring system indicate a passed test.

Questions/Further Information

Questions related to packaging and labeling can be sent to the Operations Support Section via email at MRA-Compliance@michigan.gov.

Questions related to sampling and testing can be sent to the Scientific & Legal Section via email at MRA-SCF@michigan.gov.

For more information about the Marijuana Regulatory Agency, please visit www.michigan.gov/MRA.

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