



TECHNICAL BULLETIN

March 7, 2022
Supersedes October 16, 2019

Testing Requirements for Production Products & Package RFID Tags

The intent of this technical bulletin is to provide clarification on testing requirements for marijuana product through different production phases. This bulletin also identifies when packages need to have RFID tags affixed.

Rule 3(a)(1) in the Sampling and Testing Rule Set – R 420.303(a)(1)

A producer shall give a marijuana product a new package tag anytime the marijuana product changes form or is incorporated into a different product.

Rule 3(a)(2) in the Sampling and Testing Rule Set – R 420.303(a)(2)

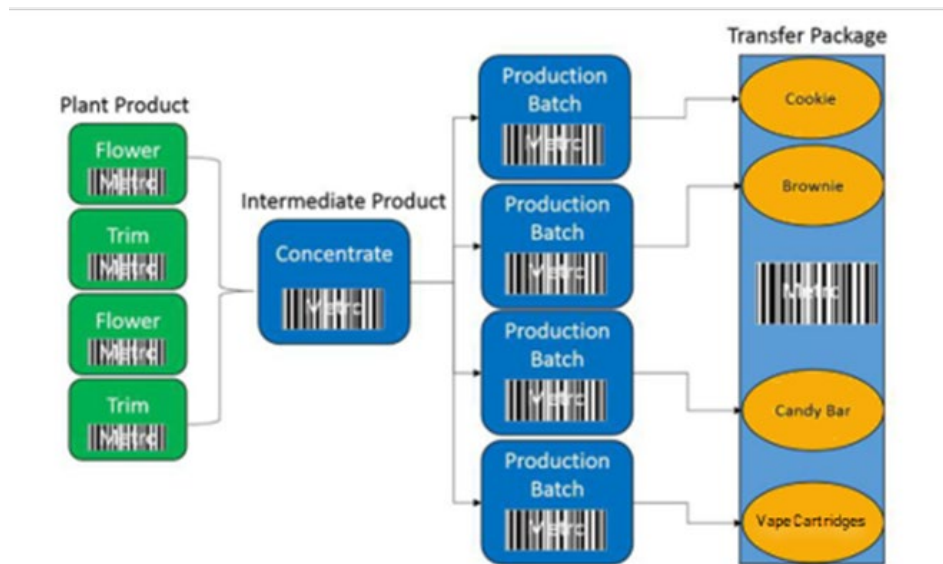
A producer of a marijuana product in its final form shall have the sample tested pursuant to R 420.304 and R 420.305. The producer shall quarantine products from all other products when the product has test results pending. The producer shall not transfer or sell a marijuana product to a marijuana sales location until after test results entered into the statewide monitoring system indicate a passed result for all required safety tests. Nothing in this subsection prohibits a producer from transferring or selling a package in accordance with the remediation protocol provided by the agency and these rules.

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

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

The above diagram illustrates the flow of product from flower to finished product. From the diagram above, the final form would be the cookie, brownie or candy bar.

All products in cartridges must be tested as this is the final form that will go to the customer.

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 form when intermediate product testing was performed. R&D tests may also be performed but do not count as compliance tests and must be completed PRIOR to any compliance testing. Please refer to the [MetrC bulletins](#) 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 broken down into smaller

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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.

Reminder: **Rule 4 in the Marijuana Sale or Transfer Rule Set - R 420.504** must be followed.

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 to make sure that the marijuana sales location receiving the product can match the individual items to the transfer manifest and their inventory.

Compliance tests are only to be done on products in their final form. For testing requirements and action limits please refer to the [Sampling & Testing Technical Guide](#).

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.

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