



ADVISORY BULLETIN

April 13th, 2022

THCA Crystals/Diamonds

The process and systems used for the extraction of marijuana oils must be performed using approved and listed equipment in compliance with the rule below.

Rule 8(5) in the Marijuana Operations Rule Set - R 420.208(5)

To ensure compliance with the National Fire Protection Association (NFPA) standard 1, 2018 edition, entitled “fire code,” which is adopted by reference in R 420.202. A licensee shall comply with the NFPA 1 as adopted

In the absence of a listing, NFPA 1 requires a registered design professional to document the processes and equipment to be used and submit that information to the Bureau of Fire Services (BFS) and local fire department for approval. It also requires field verification of the equipment and documented training of personnel who will use the equipment prior to any processing or production.

The Cannabis Regulatory Agency (CRA) is not aware of any listed equipment for that purpose that would not require an accompanying technical report in compliance with NFPA 1.

If an applicant believes they have an approved process, they must submit the documentation to BFS via email: LARA-BFS-Marihuana@michigan.gov prior to creating THCA Crystals/Diamonds.

The THCA Crystals/Diamonds creation process observed in Michigan involves the building up of flammable gases under pressure. There is a significant potential for injury to persons, or damage to property, if an approved process is not followed. These gases must be released in a controlled and consistent manner, within a closed loop system, to capture released gases. Utilization of a hood system is not an acceptable means of controlling the flammable vapors.

Licensed microbusinesses or processors performing unapproved extraction methods – including the currently unapproved processes to create THCA Crystals/Diamonds – will be referred to the CRA for investigation and inspection. This may result in sanctions, including, but not limited to, license denial, limitation, fines, revocation, suspension, nonrenewal, administrative holds, and orders to cease operations.

Questions can be sent to the CRA via email at CRA-Enforcement@michigan.gov.