

Final Product Testing Requirements

Linthicum, MD (May 10, 2024)— The Maryland Cannabis Administration (MCA) is issuing this bulletin to clarify the final product testing requirements for usable cannabis products and processed products.

Pursuant to the Code of Maryland Regulations (COMAR) 14.17.13.04, a product must be tested in its finished form in order to be transferred to a licensed dispensary or sold, distributed, or dispensed.

14.17.03 Cannabis Products .04 Product Testing

A. Finished cannabis products for retail sale shall be tested by an independent testing laboratory authorized by the Administration in accordance with COMAR 14.17.08 prior to any sale, distribution, or dispensing.

B. Testing, sampling, and other laboratory protocols shall be performed by the independent testing laboratory in accordance with the Administration's Technical Authority.

All finished cannabis products available for retail sale must have an accompanying certificate of analysis (COA) identifying either the sample type or the item name for the type of product purchased. For example, a vape cart should have a COA with an item name or sample type of vape cart. For information regarding required compliance testing, please refer to the Administration's <u>Technical Authority</u>.

Licensees have the option to test intermediate products during any stage of production. The type of product will determine which item category to select in Metrc during intermediate testing. The "R&D" item category may be used to test intermediate products during production for all non-edible products. This would include any bulk non-edible product that the licensee would like to test prior to finished cannabis product testing. The "Bulk Infused Edible" item category should be used to test intermediate products for edible products. Refer to Metrc's technical bulletin MD IB 0083 for additional information on this item category. Important: Intermediate product testing in either the "R&D" or "Bulk Infused Edible" category does not meet the requirements for compliance testing. Each finished product must receive a full compliance panel before being transferred to a dispensary. For any questions or additional information regarding Metrc categories, please contact Metrc support (support@metrc.com).

Effective August 5, 2024, any production lot of finished cannabis product that is transferred to a dispensary or offered for retail sale should have a corresponding COA that reflects the type of product purchased. Products packaged prior to August 5, 2024 will not be considered non-compliant if the COA does not match the type of final product purchased.

Failure to meet the regulations beginning on August 5, 2024 may result in a fine, sanction, or both. Please direct any questions regarding this bulletin to enforcement.mca@maryland.gov.

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